



85/633

21 JAN 1986

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Premier of New South Wales
Australia

16 JAN 1986

Dear Ms Messer,

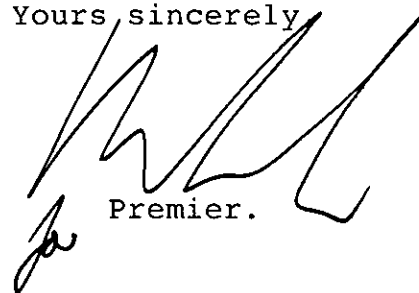
I refer to your letter of 23rd December on behalf of the Nature Conservation Society of New South Wales concerning the Tantawanglo Catchment.

I understand from the Minister for Natural Resources that no firm decision will be made on logging in the Tantawanglo Catchment before completion of studies to assess the impact of logging on water resources. These studies will require some trial logging but the Minister has assured me that the area involved will be no greater than is necessary to obtain valid results and that such trial logging will be under the scrutiny of a committee comprising representatives from the local Council and relevant State Government Departments.

With respect to roading activity, Mrs. Crosio stated that work is being undertaken by the Forestry Commission to serve logging operations outside the Tantawanglo Catchment.

In the matter generally, you may be interested to learn that the Minister for Planning and Environment has arranged for the National Parks and Wildlife Service to examine the feasibility of establishing a national park in the Tantawanglo area. You may be sure that the Government will give careful consideration to any proposal put forward by the Minister following this study.

Yours sincerely


Premier.

Ms. J. Messer,
Chairperson,
Nature Conservation Society
of New South Wales,
1st Floor,
57 Wentworth Avenue,
SURRY HILLS. 2010

23 December, 1985

The Hon. N.K. Wran, Q.C., M.P.
Premier of New South Wales
State Office Block
Phillip St
Sydney N.S.W. 2000

Dear Mr Wran

TANTAWANGALO NATIONAL PARK PROPOSAL

The Nature Conservation Council of N.S.W. wrote to you on 20 November 1984, urging the declaration of a Tantawangalo National Park, comprising parts of Glenbog and Tantawangalo State Forests and certain Crown lands.

Subsequent correspondence on this issue appears to have come to an end on 13 March with the promise of further advice from your Secretary.

In August this year, the Total Environment Centre submitted a formal proposal for a Tantawangalo National Park to yourself and the Minister for Environment and Planning, Mr Carr.

The Nature Conservation Council supports this proposal, and urges your Government to dedicate the Tantawangalo National Park. We understand advice from the National Parks and Wildlife Service should be to hand by this time.

We look forward to an early favourable decision to preserve this magnificent forest area and water catchment as a national park.

Yours sincerely

Judy Messer
CHAIRPERSON

17th February, 1986.

Dr W. Gentle
Commissioner
Forestry Commission of N.S.W.
95 York Street
Sydney NSW 2000

Dear Dr Gentle,

Re: Sawlogs in the Eden Management Area

In your letter published in the "Sydney Morning Herald" on 31st December, 1985, you stated that the Eden Native Forest Management Plan provided for an 80 year sawlog rotation, the best trees in the current integrated harvesting being left to produce sawlogs at year 80.

We seek clarification of the position in regard to the continuing supply of sawlogs to the local mills. On page 35 of the Plan it is stated that the current sawlog commitments can only be met for the 20 years from 1982 to 2002.

As the best potential sawlog trees in the current 40 year pulpwood cycle will ~~not~~ be ready for harvesting until 80 years after 1970 i.e. 2050, would you please advise where the local mills will obtain their supplies of sawlogs between 2002 and 2050.

Yours sincerely

Judy Messer
CHAIRPERSON



10 APR 1986

95-99 YORK STREET
SYDNEY, 2000

3rd April, 1986

Ms. J. Messer,
Chairperson,
Nature Conservation Council of N.S.W.,
1st Floor,
57 Wentworth Avenue,
SURRY HILLS, N.S.W, 2010 26

Dear Ms. Messer,

Your letter of 17th February, 1986 seeks clarification on continuity of the supply of sawlogs in the Eden Management Area.

In the first place, I must stress that prior to the commencement at Eden of integrated operations for sawlogs and pulpwood, the prospects for continuing supplies of sawlogs were poor, particularly in the coastal forests. This was due to a combination of factors including their fire history and economic constraints on logging imposed by the very scattered distribution of logs suitable for sawmilling.

Integrated operations have made it possible to greatly extend sawlog supplies from old growth forests in the area, resulting in a revitalised industry and a much more economic use of the wood resource. It is essential to realise that in their present degraded state the old forests at Eden cannot support any sawlog operation.

The rate of cutting of sawlogs is obviously related directly to their availability from an integrated operation. While the forest management plan did predict a twenty year supply of sawlogs from the old growth crop at then-current quota levels, in fact actual harvest rates combined with planned quota reductions will extend this period to at least 30 years. In this, the local sawmilling industry has co-operated in accepting the levels required for sustaining their industry.

The Eden Management Plan states quite clearly that trees considered capable of significant growth should generally be retained for harvesting in a later cutting cycle (Harvesting Prescription B(i)). An inspection of logging operations would show that this prescription results in the retention of an appreciable number of such trees. These will start to become available at the end of the current cutting cycle; i.e. from about the year 2010.

Trees capable of significant growth include some stands of earlier fire regrowth (e.g. 1939, 1952 and 1964 regeneration). These stands will be capable of thinning for a pulpwood yield within the current cutting cycle. Such thinning operations will encourage the growth of sawlogs to maturity within the second cutting cycle.

The system of forest management being practised at Eden is not clearfelling resulting in even-aged regrowth stands as is often stated in a facile way. Rather, at the end of the estimated forty year cycle the new crop will consist of trees ranging in age from one year old regeneration to forty year old regrowth, to older sawlog-sized trees retained in previous logging and ranging also to veteran habitat trees. A yield of sawlogs will be available during the second cutting cycle from older sawlog trees and later in the cycle from the larger stems in regrowth stands.

In summary, integrated hardwood operations at Eden have facilitated and improved the long term prospects for sawlog production, most particularly in the years of concern to you.

Yours faithfully,



W. GENTLE,
Commissioner for Forests.

Woodchip battle

SIR: Your environment writer Joseph Glascott was absolutely right in forecasting (*Herald*, December 7) that the conservation battle of 1986 will be fought over the eucalypt forests of the South Coast.

When the Japanese got their foot in the door 16 years ago, environmentalists did not really know what woodchipping was all about, the area was comparatively small and the volume of woodchips low. Since then, there has been steady expansion so that the volume of exports to Japan from NSW alone has reached 850,000 tonnes a year, and 82 per cent of the urban population want it stopped. (*Spectrum* search).

It is sheer hypocrisy for the Forestry Commissioner to boast of the "magnificent new forests" being created when he well knows, with the logging on a 40-year rotation, these new forests are destined for the woodchip mill in a mere 20 years if they mature.

Woodchip logging may now be providing a profit to the Forestry Commission, but Dr. Wal Gentle conveniently forgets the abysmal losses earlier in the life of the 20-year concession and the disastrous effects which have destroyed thousands of hectares of forest since the industry was established, without any public consultation, in 1969.

The NSW Government created an alarming precedent when, in 1982, it rejected Forestry Commission advice and phased out rainforest logging in NSW. Conservationists look to the Government to continue this excellent record of protecting the natural environment, even if it means disregarding forestry advice.

Peter G. Maslen,
Chairman,
The Colong Committee Ltd,
Argyle Street,
Sydney.

December 18
WRITTEN BY J.C.S.

Hardwood future

On a recent driving holiday in the Blue Mountains, we were saddened to see

SMH 27

that a good part of the road traffic consisted of timberjankers carrying big hardwood logs to Triabunna for woodchipping.

Later we saw the tallest hardwood tree in the world — not yet, fortunately, turned into woodchips. However, much can happen in 15 further years of felling.

One must admire the courage of the Minister, Mr Kerin, in giving the woodchip industry such a favourable decision. A lesser man may have hesitated after considering that future generations may well hold him responsible for depriving them of the chance to see these ancient, magnificent giants.

How many more crimes will be committed in Australia in the name of full employment before thinking Australians demand a halt?

B. G. Agnew,
Toronto Avenue,
Cromer.

December 20

December 20

Sydney

Woodchip plan

SIR: Mr Maslen accuses me (Letters, December 27) of well knowing that "with the logging on a 40-year rotation, these new forests are destined for the woodchip mill in a mere 20 years if they mature".

Actually, I do not well know this at all. The statutory document controlling operations is the Eden Native Forest Management Plan 1982, which makes clear that the next harvest of woodchip logs will be a thinning-out, to produce pulp at year 40 yet leave the best trees to produce sawlogs at year 80 — that is, an 80-year rotation is planned and is actually well on the way now.

Nor do I "conveniently forget the abysmal losses earlier in the life of the 20-year concession", because there were none, according to the accounting conventions prescribed for the Forestry Commission by the Auditor-General.

Doubtless for brevity, Mr Glascott did not go into amortisation procedures, which I explained to him in the course of a one-hour interview, but contented himself solely with publishing the bottom-line surplus of \$1.2 million for 1984-85 to which Mr Maslen refers.

Obviously (except, I suppose, to those using biscuit-tin conventions of accounting), a long-term investment will incur initial outflows in excess of revenues, but this point was passed about 1979 at Eden, when operations moved into annual surpluses which are expected to continue.

W. Gentle,
Commissioner for Forests,
York Street,
Sydney.

December 27

Ref 26.12.85

Sawlog production in Eden Wooded Area

1. The resource available is given on P30 of the 1982 F.C. Eden Native Forest Management Plan as at 1971/2

	Gross Cum.	
Pulpwood	23,124,000	89%
Sawlogs	2,816,000	11%
	<u>25,940,000</u>	<u>100%</u>

2. Actual Results of 12 years Operation to Jan 1982 in S.F.

	EDEN	BEGH	BOMAHAT	TOTAL
SAW LOGS	368507 9%	114762 20%	322269 19%	<u>805538</u> 38%
PULPWOOD	3,076,298 98%	407,378 80%	1,217,668 81%	<u>4,701,538</u> 87%
TOTAL	<u>3,444,931</u> 100%	<u>508,432</u> 100%	<u>1,494,401</u> 100%	<u>5,440,209</u> 100%

NOTE. DATA FROM APPENDIX 3C WHERE PULPWOOD DATA ADJUSTED SLIGHTLY

3. LIFE OF OLD GROWTH SAWLOGS AT PRESENT QUOTA LEVELS (P.35)

	SAWLOGS	PULPWOOD
	Cum Gross	Cum Gross Billets
Assessed Volume in 1.	2,816,000	20,374,000
Less harvested 72-82	<u>1,118,000</u>	<u>4,876,000</u>
Available 20.682	<u>1,698,000</u>	<u>15,498,000</u>
Commitment P.A. (Gross)	86,000	510,000
Years Available	20	30
Date	2002	2012

Comment from P37 on above shortfall of Sawlogs:

"It is therefore desirable, on management grounds, to reduce the sawlog allocation to a level that can be supplied from integrated logging operations. The longer this adjustment is left the greater the reduction in yield that will ultimately be required."

EDEN FORESTRY MGT PLAN 1982

P 58, 60

64

re: letter to ... 7/2/86 J. Som

nett quota per annum
Sawlogs

p61 - w/ life habitat
5 trees per 15 ha

~~Baga~~
~~Bambala~~ 20,360 m³

Bambala 24,720 m³

Eden 24,100 m³

69,180

/ 530,000 ÷ 13%

6,000

One-to ft
allocation
from
clearing
for softwood
plantation

70

70
530

13
53) 7.0
53
170
159

8/16

Suppose 29/11/85

To: Tim Laneville
From: Jocelyn.

Dear Tim,

Could you write an item for the N.C.C. Newsletter on Forestry Commission management plans along the lines of how we've (= you've) previously had trouble getting management plans from the F.C., now all of a sudden we have 3, and (presumably) they contain interesting things, like the dedication of the Mowla Lakes Forest Preserve or Flora Reserve, (whichever it is) — remember I didn't manage to delete ^{the reference to} this from the Newsletter item before it went to press last time.

Also, ask me about

- 1) impending meeting on proposed new Crown Land set organised with Deputy Director, M. Ockwell, for 2.30 pm Wed 4th Dec. — Are you interested in going? Several people going already.
- 2) Offer by Whitehouse to talk about NPSWS Conservation priorities.

Jocelyn.

P. 54 - talks about 2nd cutting cycle

+ current quota commitments

See 2nd last par - must $\downarrow$ sawlog to $\rightarrow$ sustainable

∞ ~~push this line~~ } chop.

include this (sentiments) in letter to Wal Gentle.

NB - p56 - Eden Mgt Plan 1982 only operates to 1992 (10 yrs.)
(not 80 years).

Described annual yield - described as gross pulpmass ^{530,000 ~~tons~~ m³} billets. -

not strictly comparable - ask Gentle?

{
= log
quartered
(with or
without pine?)

Gentle -

" We seek clarification on relative quantities of
Sawlogs and pulpmass from the Bega Bombala
& Eden Working Circles separately.

" We ^{believe} understand the Eden N For Mgt Plan 1982
indicates that the sawlog yield will be a maximum of the
quota for the particular section. However ^{it is not} we are not
clear as to the ~~relative~~ if it reasonable to relate the
quota total of ca ^{69,180} 70,000 m³ nett to the pulpmass
total of 530,000 m³ gross
+ 69
6,000

other point - why opportunities must be taken to $\downarrow$ quotas if further
sawlogs are avail.

X NCC letter head

PRESS RELEASE

Friday, 31 January, 1986.

WIDESPREAD SUPPORT FOR URBAN BUSHLAND PROTECTION

The announcement today by the Minister for Planning and Environment, Mr Bob Carr, of the State Environmental Planning Policy on Bushland in Urban Areas is of tremendous significance for the conservation of the urban environment and is welcomed by the Nature Conservation Council of New South Wales.

"Sydney is probably the only major city in the world that still retains a substantial amount of native vegetation. The bushland of Sydney is extraordinarily diverse in terms of species and plant communities," said Judy Messer, Chairperson of the Nature Conservation Council.

"At the same time it is constantly threatened by development - both public and private. The continual loss of this unique heritage as a result of intentional and unintentional actions did much to contribute to the emergence of the urban bushland conservation organizations in the early 1970's," Judy Messer continued.

"We have been working for fifteen years to get legal protection for urban bushland, so this is a very historic moment. The preparation of the S.E.P.P. has involved full consultation with the conservation groups most involved in developing policies to protect our bushland, and we think that this has been a good example of the Government's commitment to public participation, even though the conservation groups did not achieve all they had hoped."

living
hiving- "Enormous degradation of urban bushland has resulted from often well-intentioned efforts to "improve" natural reserves, by introducing inappropriate activities that involve the loss of trees and understorey, or from the continuing living-off of parks and reserves for roads, parking, sports fields, club houses, and so on. Hopefully that will now come to an end."

"There is widespread community support for protection of urban bushland. The N.C.C.'s 76 member organizations support policies aimed at its retention and protection. In addition, the N.C.C. continually receives requests from the public for help in saving areas of remnant vegetation, so we believe Mr Carr's actions will be widely applauded."

Seize
sewage "And of course," Judy Messer added, "the N.C.C. is looking forward to the preparation of an S.E.P.P. for bushland under the control of statutory authorities such as the D.M.R. and the Metropolitan Water Sewage and Drainage Board - both of these juggernauts have really been dragging their feet and have definitely treated urban bushland as an expendable resource. Everyone has to realize that urban bushland is absolutely finite and we must act now if it is to be saved for future generations."

Inquiries: Judy Messer 43-1170
Jocelyn Howell 212-6530
211-5366.

NATURE CONSERVATION COUNCIL OF NSW

THE NATURE CONSERVATION COUNCIL OF NSW
LEVEL 1, 55-57 WENTWORTH AVENUE,
SURRY HILLS, NSW 2010.
TELEPHONE (02) 211 5366. TELEX AA24041



21st March, 1986

The Organisers,
Forest Festival,
c/- Towamba Valley Catchment Protection Association,
P.O., Wyndham. N.S.W. 2550

Dear People,

Congratulations from the Nature Conservation Council of New South Wales on organising a Forest Festival to celebrate the natural values of our native forests.

It is very timely to have people's attention drawn to the wildlife values, the magnificent diversity of plant life, the protection of water catchments and soil, and the scenic and aesthetic values of unspoiled forests, which form a focus of attraction for tourists and visitors to the region.

We feel sure your Festival will go a long way towards counteracting the one-sided, self-interested case for woodchipping being put to the public by Harris Daishowa (Aust.) Pty. Ltd., using profits gained by the export of our native forests. Harris Daishowa maintains that woodchipping is "renewing" the forests and making a wonderful lifestyle for everyone in the timber industry. The truth is, rather, that use of timber for woodchipping is reducing the supply of sawlogs below a sustainable level, and providing a very low rate of employment for the amount of timber resource used.

The Nature Conservation Council of N.S.W., which comprises 76 individual societies with a total membership of approximately 140,000, opposes woodchipping except where genuine sawmill waste is used. We believe alternative uses of our timber resource which involve increased local processing and therefore increased employment should be investigated, as part of the development of a diversified economic base for the south eastern region of New South Wales.

Most importantly, the magnificent forest values of the Tantawangalo National Park Proposal, the Coolangubra National Park Proposal, the Nethercote Falls, the Merrica River catchment area, and the Coolumbooka Nature Reserve proposal should be reserved as national parks and nature reserves for all Australians to enjoy, both now and in the future.

Rather than "renewing" the forests, clearfelling operations for woodchipping have caused siltation of streams and water catchments, wildfires have originated from bark dumps in State Forests, dense forest regrowth after clearfelling is adding to the districts' fire hazard, and bird and animal populations are devastated by clearfelling of whole coups of forest vegetation.

We believe these adverse effects of the export woodchipping industry need to be placed before the public to enable them to make a fully informed assessment of the true impact of the industry on the south east region. These adverse effects will be contrasted by the positive natural values emphasised in your Festival.

Our commendations and best wishes !

Yours sincerely,

Judy Messer
Judy Messer.
CHAIRPERSON.

per JH

21st March, 1986

The Organisers,
Forest Festival,
c/- Towamba Valley Catchment Protection Association,
P.O., Wyndham. N.S.W. 2550

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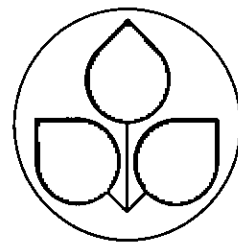
Judy Messer.
CHAIRPERSON.

Please reply to:
Canberra Office
Box 1875, G.P.O.,
Canberra, A.C.T., 2601
Tel.: (062) 47 3013
47 2472

Exec.
Jon S.

30 APR 1986

Jonathan



ACF

**Australian
Conservation
Foundation**
672B Glenferrie Road
Hawthorn Victoria
Australia 3122

Telephone (03) 819 2888
International + 61 3 819 2888

Telex AA34852

29.4.86

Joelyn Howell
NCC
57 Wentworth Ave.
Surry Hills, NSW, 2010

Dear Joelyn,

It appears to be time we held another South East Forest Alliance meeting.

A meeting is planned for Sunday, June 8, starting at 9 a.m. at the Canberra and South East Region Environment Centre, Kingsley Street (next to ANU). We will plan to finish the meeting by 4 p.m.

For those people who will be in Canberra on Saturday night, there will be a social get together at 15 Schlich St, Yarralumla (ph 062 816750) from around 7 p.m. on.

Would you please let me know as soon as possible if you are able to come, or if there are problems for you with that weekend. Please let me know too (at least two weeks before the meeting) if you would like accommodation.

With regards,

Debbie L.

Debbie Quarmby
Ph 472472

*I believe you'll be on
holidays at this time, & would
you pass this on to anyone
else who may be interested in
representing NCC?*

*Have a good holiday.
Cheers, Debbie.*

✓SEFA



16 JUN 1986

RML 6257

NEW SOUTH WALES
MINISTER FOR PLANNING AND ENVIRONMENT

S Y D N E Y,

Ms. Judy Messer,
Chairperson,
Nature Conservation Council of NSW,
1st Floor,
57 Wentworth Avenue,
SURRY HILLS 2010 02

-4 JUN 1986

Dear Ms. Messer,

I refer to the Nature Conservation Council's representations requesting the State Government to agree to an approach by the Far South Coast Environment Group and the Australian Conservation Foundation for financial support to enable them to participate in the current review of the Eden Woodchip operation.

The Australian Conservation Foundation and the Far South Coast Environment Group have approached me directly on this matter and I have asked the Departments within my administration to carefully look at the proposals submitted by these organisations. The Director of National Parks and Wildlife was asked to review the adequacy of existing parks and reserves within the supply zone of the woodchip operation and also to look at proposals by the conservation groups for new national parks, in the south eastern part of the State, particularly the Tantawangalo and Coolangubra proposals.

With regard to the provision of specific input by these conservation organisations into the Eden Woodchip operation, the Director of National Parks & Wildlife has informed me that his officers have already examined an excellent document which was prepared by the Australian Conservation Foundation for the National Parks Association on the Eden Woodchip operation and that this document should provide a very useful means by which the public can become aware of the woodchip issue.

As you may appreciate, the Departments within my administration have only limited funds available to meet their many responsibilities throughout the State, and both the Department of Environment and Planning and the National Parks and Wildlife Service have informed me that funds set aside for the 1985/1986 financial year, to assist conservation groups have been fully committed.

While the Commonwealth has made a contribution to assist both the Australian Conservation Foundation and the Far South Coast Environment Group in preparing a submission in respect of the environmental impact

statement on the Eden Woodchip industry, the State Government has taken certain initiatives in having funds allocated through the National Estate Grants Program for a conference to be convened on woodchipping in New South Wales. The conference proceedings are to be documented, published and made freely available to the public.

In having funds made available for this purpose, I feel that the New South Wales Government has made a very constructive contribution towards enabling the conservation movement to participate in the review of the Eden Woodchip operations.

I have written to both the Australian Conservation Foundation and the Far South Coast Environment Group in similar terms to this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bob Carr', with a long horizontal stroke extending to the right.

BOB CARR

TELEX

4th July, 1986

The Hon. Barry Cohen,
Minister for Arts, Heritage and Environment
Parliament House
CANBERRA ACT 2600

Dear Mr Cohen,

The Nature Conservation Council of New South Wales urges you most strongly to extend the period for public comment on the Environmental Impact Statement for the Eden (N.S.W.) Export Woodchip Operation for 1989-2009.

This E.I.S. proposes major timber extraction activities over approximately 200,000 hectares of native forests in New South Wales, extending over a period of 20 years. Native forest areas listed on the Interim Register of the National Estate are included in the licence application area.

A two-month public review period for a project of such magnitude and duration is grossly inadequate. This E.I.S. provides the first opportunity in ten years for public review of the environmental effects of past woodchipping operations, and the implications of future operations proposed to extend well into the next century. The proposal should be available for public assessment for at least six months. The proponents have taken 50% longer to prepare the E.I.S. than their original estimate.

In the interests of adequate public review of an activity of such major environmental impact, Council requests you to extend the time available for public comment by at least one month, and longer if possible.

Yours sincerely

Judy Messer
CHAIRPERSON
Nature Conservation Council of New South Wales

Telex No. 62313 MINHOM

28 July, 1986

The Secretary,
Department of Arts, Heritage
and Environment,
GPO Box 1252,
CANBERRA ACT 2601

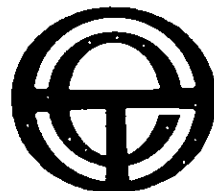
Attention: Mrs A.N. White

Dear Secretary,

The Nature Conservation Council of New South Wales presents the attached submission containing comments for your attention when considering the Draft Environmental Impact Statement for the Eden (N.S.W.) Export Woodchip Operation for the period 1989-2009, by Harris-Daishowa (Australia) Pty Ltd.

Yours sincerely

Jocelyn Howell
PROJECT OFFICER



MEETING BETWEEN HON. J. HALLAM, MINISTER FOR AGRICULTURE
LANDS AND FORESTS, AND
NATURE CONSERVATION COUNCIL OF NSW, TOTAL ENVIRONMENT
CENTRE AND SOUTH-EAST FOREST ALLIANCE, 21 JULY, 1986.

Eden Woodchip Issue

1. The future of the south-east forests is the top priority natural environment issue for the State's conservation movement.
2. Two major national parks have been proposed -- Tantawangalo and Coolangubra -- to remedy the inadequate representation of fauna and flora in secure reserves. The Australian Museum has stated the national park system is inadequate. The quoting of numbers for the area in existing reservations (by the industry) does not reflect their conservation adequacy. The bulk of the two park proposals is now on the Interim Register of the National Estate.
3. There is agreement amongst scientists, foresters and conservationists that the aims of intensive forestry and wildlife protection still conflict today.
4. The practices of leaving habitat trees and wildlife buffer strips are of little value. They are burnt (with significant impact on understorey species); and the larger trees die due to fire, wind, exposure and disturbed drainage. Braithwaite, CSIRO, 1984, described the long-term value of habitat trees, to fauna, as "minimal". Buffer strips can also be logged; are smaller than prescribed 10 years ago and have no long-term security.
5. The recent environmental impact statement admits much research to answer major questions still needs to be done. Woodchipping in these forests is an experiment - that should be stopped. Conservationists support only the use of sawmill waste for woodchips.
6. The company does not guarantee it will remain in the area after the first logging cycle of old-growth forest. It does not know (and neither does the Forestry Commission) whether it is economic to take thinnings and small regrowth and thus be a sustainable operation.
7. The recently announced change to an 80-150 year cycle will not be introduced until the cutting of all old growth is completed (in 2010) - thus destroying the national park values.

8. The area is the most prone in Australia to severe wild fire. After clearfelling, dense regrowth returns, constituting a massive fine fuel load. The Forestry Commission and CSIRO scientists admit this is an urgent and difficult problem, because control burning of young regrowth can kill it (and therefore timber productivity).
9. Due to overcutting in the past, the sawmill industry is set to contract, very severely, just after the year 2000. The national park proposals make no difference to its ultimate fate.
10. Conservation groups are investigating economic and forestry-related alternatives to place the industry and region on a more sustainable level.

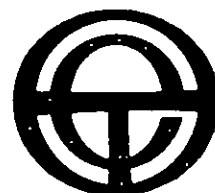
REFORM OF THE FORESTRY ACT.

Much conflict over forestry issues stems from the lack of public involvement in land-use decisions. The increasing public interest in our forestlands, and resistance to review of land-use decisions leads to a delegitimisation of those decisions.

The Forestry Commission has resisted public environmental impact statements. Currently they are under threat of Court action from the Towamba Valley Catchment Protection Association for their refusal to produce an EIS for the proposed logging of Coolangubra. Also there is no public involvement in the production of management plans.

In order to remedy this biased (and politically costly) decision-making, Total Environment Centre commissioned a Study of the Forestry Act. Major proposals to improve public involvement and enforcement of environment protection measures on Crown and private forest land were recommended.

These are attached. An inquiry into the Act was also proposed by the environment movement.



MEETING BETWEEN HON. J. HALLAM, MINISTER FOR AGRICULTURE
LANDS AND FORESTS, AND
NATURE CONSERVATION COUNCIL OF NSW, TOTAL ENVIRONMENT
CENTRE AND SOUTH-EAST FOREST ALLIANCE, 21 JULY, 1986.

Eden Woodchip Issue

1. The future of the south-east forests is the top priority natural environment issue for the State's conservation movement.
2. Two major national parks have been proposed -- Tantawangalo and Coolangubra -- to remedy the inadequate representation of fauna and flora in secure reserves. The Australian Museum has stated the national park system is inadequate. The quoting of numbers for the area in existing reservations (by the industry) does not reflect their conservation adequacy. The bulk of the two park proposals is now on the Interim Register of the National Estate.
3. There is agreement amongst scientists, foresters and conservationists that the aims of intensive forestry and wildlife protection still conflict today.
4. The practices of leaving habitat trees and wildlife buffer strips are of little value. They are burnt (with significant impact on understorey species); and the larger trees die due to fire, wind, exposure and disturbed drainage. Braithwaite, CSIRO, 1984, described the long-term value of habitat trees, to fauna, as "minimal". Buffer strips can also be logged; are smaller than prescribed 10 years ago and have no long-term security.
5. The recent environmental impact statement admits much research to answer major questions still needs to be done. Woodchipping in these forests is an experiment - that should be stopped. Conservationists support only the use of sawmill waste for woodchips.
6. The company does not guarantee it will remain in the area after the first logging cycle of old-growth forest. It does not know (and neither does the Forestry Commission) whether it is economic to take thinnings and small regrowth and thus be a sustainable operation.
7. The recently announced change to an 80-150 year cycle will not be introduced until the cutting of all old growth is completed (in 2010) - thus destroying the national park values.

8. The area is the most prone in Australia to severe wild fire. After clearfelling, dense regrowth returns, constituting a massive fine fuel load. The Forestry Commission and CSIRO scientists admit this is an urgent and difficult problem, because control burning of young regrowth can kill it (and therefore timber productivity).
9. Due to overcutting in the past, the sawmill industry is set to contract, very severely, just after the year 2000. The national park proposals make no difference to its ultimate fate.
10. Conservation groups are investigating economic and forestry-related alternatives to place the industry and region on a more sustainable level.

REFORM OF THE FORESTRY ACT.

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These are attached. An inquiry into the Act was also proposed by the environment movement.

NATURE CONSERVATION COUNCIL OF NSW

THE NATURE CONSERVATION COUNCIL OF NSW
 LEVEL 1, 55-57 WENTWORTH AVENUE,
 SURRY HILLS, NSW 2010.
 TELEPHONE (02) 211 5366. TELEX AA24041



SUBMISSION BY
THE NATURE CONSERVATION COUNCIL OF NEW SOUTH WALES
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE EDEN (N.S.W.) EXPORT WOODCHIP OPERATION
FOR THE PERIOD 1989-2009, April 1986.

Proposed by Harris-Daishowa (Australia) Pty Ltd.

28 July, 1986

1. INTRODUCTION

The Nature Conservation Council of New South Wales presents the following comments on the above-named Draft Environmental Impact Statement.

The Nature Conservation Council of N.S.W. comprises 77 conservation organisations throughout the state, and has had a long-standing concern during its thirty-year existence for the adequate conservation and proper management of the state's forest ecosystems.

Council strongly recommends that Harris-Daishowa (Australia) Pty Ltd. be refused an export licence for the proposed woodchip operation because of its adverse impacts on the long-term conservation of forest ecosystems and species inadequately represented in the region's existing National Parks and Nature Reserves. In addition, the proponents have failed to demonstrate the long-term sustainability of their timber extraction operations.

Council finds the Draft EIS an inadequate document on which to base a decision on the granting of an export licence because of deficiencies in its consideration of a number of matters, as outlined in this submission.

The most fundamental inadequacy of the EIS is its inability to enable assessment of the full environmental impact of the proposal without active participation as joint proponent by the Forestry Commission of N.S.W., which is responsible for forestry management procedures which form an integral part of the operation. Council's recommendation concerning this inadequacy is contained in Section 11 at the end of this submission. This recommendation, together with those in Section 2, form Council's major recommendations for immediate government response to the proposal. Recommendations relating to specific aspects of the proposal and the EIS are contained throughout the body of this submission, and have generally been highlighted by underlining.

2. MAJOR RECOMMENDATIONS

The Nature Conservation Council of New South Wales strongly recommends that approval not be granted for a woodchip export licence to Harris-Daishowa (Australia) Pty Ltd. for the years 1989-2009, for the following reasons:

2.1

The existing and proposed timber extraction operations by Harris-Daishowa will have an adverse effect on the long-term survival of the region's forest ecosystems, including wildlife, which are inadequately conserved in existing National Parks and Nature Reserves.

2.2

The sustainability of the existing and proposed pulpwood extraction operation has not been demonstrated by the Harris-Daishowa (Australia) Pty Ltd Environmental Impact Statement and the Eden Native Forest Management Plan 1982, on which the EIS depends for basic information.

2.3

The E.I.S. provides insufficient information on which to base a decision regarding granting of an export licence for 1989-2009. Deficiencies are particularly evident in the following areas:-

- . existing flora and fauna inventory of the region
- . forest management necessary for wildlife conservation
- . future pulpwood and sawlog resources
- . pulpwood yield estimates from logging regrowth thinnings
- . effect of project on water resources and catchment hydrology
- . effect of soil fertility levels on growth rates of future timber resource
- . alternatives to the proponents' proposal.

As stated in the EIS page 4.3, a working group chaired by Dr. D.A.N. Cromer, Director General of the Forestry and Timber Bureau, found that only fragmentary data existed on the biological and ecological features of many of the areas where woodchips were harvested; hence a large degree of uncertainty surrounds the nature and significance of the environmental impacts. The EIS states that no original research was undertaken in preparing the section on "Existing Environment" (page 7.1).

Approval of the project on the basis of information provided in the EIS would run counter to Recommendation Number 1, regarding Export Licences, of the Senate Standing Committee on Science and the Environment, in their report on Woodchips and the Environment (1977), namely -

"Until such time as the environmental problems relating to soil nutrients, wildlife preservation and the conservation of genetic characteristics.....are satisfactorily resolved, and with the exception of proposed projects intending to use as chip material only waste from genuine sawlog operations, no licence for the export of woodchips be issued to new projects."

2.4

In addition, the Nature Conservation Council of N.S.W. strongly recommends that no approval be granted to Harris-Daishowa (Australia) Pty Ltd, for an increase in the current export woodchip quota up to 1989, because resource availability has not been adequately demonstrated, and all relevant environmental factors have not been considered. Approval of this quota increase

would contravene Recommendation Number 2 of the above-mentioned Committee, namely-

"No increase in the quantity of chips to be exported be approved without the most careful consideration of all relevant environmental factors as set out in this report."

The EIS appears to give no special consideration to the environmental impacts of this proposed quota increase, and refers primarily to personal communications on potentially available resource as the justification for a quota increase. Therefore, similar concerns about environmental impact apply to this quota increase as apply to the application for licence renewal beyond 1989.

3. IMPACT ON WILDLIFE

3.1

Integrated logging, as practised and proposed for pulpwood extraction, will have an adverse effect on forest wildlife, such that the long-term survival of the region's wildlife is not assured.

Integrated logging as practised and proposed for pulpwood extraction for Harris-Daishowa (Australia) Pty Ltd (HDA) will have an adverse effect on forest wildlife. The EIS admits (page 2.12) that "...there are still many limitations in knowledge concerning the forest fauna of the area, and the impact of logging and fire." There is very little information on the region's forest invertebrates, amphibians and reptiles. Some research has been published on birds and mammals, but for most species insufficient research has been carried out on individual requirements to be able to predict with accuracy the likely effect of integrated logging operations on long-term survival. For faunal species on which research has been carried out, an adverse effect is predicted if current woodchip operations continue.

Integrated logging removes most of the very old trees required to provide nests for at least 24 species of tree-dwelling mammals and birds (gliders, pigmy possums, bats, lorikeets, cockatoos, owls, tree-creepers). Also, integrated logging removes large amounts of tree canopy, needed as a food resource for, e.g., nectar-eating birds, koalas.

Wildlife known to be affected adversely by "integrated logging" operations for woodchipping include:

- i) birds and mammals which require tree hollows present in old trees as homes and nests for breeding -
 - . birds - at least 14 species
 - . gliders and possums - at least 6 species
 - . some forest bats - at least 4 species

(Hollows generally begin to appear in eucalypts from about 50 to 100 years of age, depending on species.)

- ii) nectar-feeding birds, including honeyeaters, lorikeets and silvereyes, which require flowering tree canopies of a variety of species to ensure year-round food resources;
- iii) birds which forage on mature tree trunks, notably the treecreepers;
- iv) the koala, which needs to forage in tree canopies on leaves, and is already uncommon in the area.

3.2

Recommendations for forest management designed to ensure the long-term survival of the region's wildlife have not been followed in the existing woodchip operation, and are not proposed.

The HDA operation proposes the cutting of the entire old growth forest allocated for integrated logging in the Agreement Area within forty years, by 2010.

The nature and extent of unlogged areas of old growth forest are of crucial importance to wildlife survival. Recher, Rohan-Jones and Smith, in 1980, after conducting specific research into the effects of the Eden woodchip operations on forest birds and mammals, recommended a number of management prescriptions necessary to help achieve the objective of species conservation. These are summarised on pages 54-56 of their paper, Effects of the Eden Woodchip Industry on Terrestrial Vertebrates with Recommendations for Management, published by the Forestry Commission of N.S.W. as Research Note No. 42, 1980.

These recommendations have not all been followed in management prescriptions currently in operation and proposed for HDA's future operations.

For example, Recher et al recommended the following requirements for buffer strips:-

- . forty metres to either side of a watercourse should be the minimum width for buffer strips;
- . logging should be excluded from any part of the buffer strip;
- . buffer strips should be extended to the top of some drainage lines within each compartment.

Rather than support these management prescriptions in total, the Forestry Commission's Eden Native Forest Management Plan (1982) (ENFMP) in Appendix 9, and Appendix 4A of the EIS, specify that a filter strip shall be a minimum of 20 metres each side of a watercourse for slopes under 18°. Trees may be felled within or into filter strips provided no tree is felled "deliberately or negligently" into a stream.

In addition, filter strips may be burnt as a result of post harvest burning operations. Thus it is misleading to regard filter strips as unlogged wildlife refuge areas. In fact, current prescriptions for filter strips appear to be weaker than those in force ten years ago, when no trees could be felled nor logging machinery come within 40 metres of any stream with a catchment area greater than about 50 hectares. Also, filter strips do not conserve habitats away from watercourses.

Policing of prescriptions relating to filter strips is very important. Because logging crews received piece rates rather than wages and are under pressure to meet pulpwood quotas, the temptation to fell trees in gully sites, which often support the biggest and most profitable trees, is considerable.

Recher et al also recommended that the length of the logging cycle should be staggered through space and time, in order to ensure survival of birds and mammals which require older trees. Although the Forestry Commission has introduced its PMPC system including the "Special Emphasis Flora and Fauna Protection" category, this is not part of a comprehensive system of staggered logging cycle lengths. Longer cycles will not come into operation until after all old growth forest has been cut in the first 40 years to 2010.

Confidence in the effectiveness of the Forestry Commission's PMPC system in protecting valuable wildlife habitat has been undermined by events such as the fate of the Waratah Creek area in Coolangubra State Forest, described under section 6.3 in this submission.

3.3

Insufficient research has been carried out to enable comprehensive assessment of the proposal's impact on the region's wildlife.

Recher et al (1980) reached the following conclusions, in part, on the effect of clearfelling operations on wildlife.

- . "There will be a decline in the abundance of animals which require mature forest."
- . "A number of birds and mammals may be threatened with extinction on a regional level."
- . "Changes in the pattern of flowering and the abundance of nectar will affect the movements and numbers of nectivorous birds."
- . "There may also be other changes in abundance, patterns of movement or nesting cycles which will not become apparent until a significant part of the existing mature forest is logged and replaced by regeneration."

This last conclusion suggests that further wildlife research should have been funded by the proponents so that results could have been presented in the EIS to enable proper assessment of impact of the proposal on wildlife. The type of research needed includes habitat size and food resource requirements of wildlife dependent on mature forest, migratory capacity, and present population size within State Forests and national parks and nature reserves. This research has not been done, in fact, the EIS states (page 7.1) that "no original research was undertaken in preparing this section [Existing Environment] of the study."

Approval of the project as proposed in this EIS would therefore run counter to recommendation number 21 of the Senate Standing Committee's 1977 report, Woodchips and the Environment, namely, that-

"The Federal Government pay particular attention to the conservation status of forest flora and fauna when considering the issue of export licences, with a view to approving export proposals only where necessary steps have been taken, as published in State land management proposals, to adequately conserve flora and fauna species of the proposed area of supply."

Conservation of birds and animals in State Forests and flora reserves is one of the statutory objectives set out for the Forestry Commission under the NSW Forestry Act, [S.8A (i)(e)(ii)].

4. ADEQUACY OF THE REGION'S EXISTING CONSERVATION RESERVES

Because of the adverse impacts of integrated logging on forest wildlife, as described above in Section 3, adequate undisturbed areas of forest habitat and food resource are required in the form of national parks and nature reserves to ensure conservation of forest ecosystems and species. The existing national park and nature reserve system represents the result of political trade-offs rather than a survey of adequate conservation needs. According to Recher et al (1980), "with the exception of Nadgee Nature Reserve, none of the parks was established following a survey of their flora and fauna, nor was the

scientific community consulted." The vegetation consultant states in the EIS (page 7.19) that "no comprehensive survey of the entire area has yet been carried out....In the opinion of the author, such a survey is urgently needed if the adequacy of the existing reserve system is to be properly assessed."

Recher et al (1980), after specific research on forest birds and mammals, concluded:-

"We do not consider the National Parks and Nature Reserves in the Eden District adequate by themselves for the long term conservation of the region's wildlife"

Thus, additions to the national park and nature reserve system are essential if the region's plant and animal diversity is to be conserved.

The following national parks and an extension have been proposed to augment the region's conservation reserve system. The national park proposals contain areas of National Estate significance,

a) Coolangubra National Park

Comprising 48,000ha including the existing Nalbaugh and Nungatta State Forests. This proposal contains a great diversity of vegetation types and habitats, spanning a transition zone from coastal forests to highland forests. It has wilderness value and great wildlife significance, containing possibly the best arboreal mammal habitat known in Australia at Waratah Creek. This area of great wildlife significance has been recognised by the Forestry Commission, but has not been protected from logging. The richest habitat for these arboreal mammals has been substantially cleared for agriculture and pine plantations, so that management of the remaining suitable habitat is critical for their conservation.

b) Tantawangalo National Park

Tantawangalo National Park would conserve undisturbed a catchment area vital for the protection of quality of water supply to local towns. It also supports a rich and diverse bat fauna as well as large numbers of arboreal mammals and birds.

c) Merrica River catchment addition to Nadgee Nature Reserve

The entire Merrica River catchment should be added to form a rational boundary for management of Nadgee Nature Reserve. This would implement Proposal number 21 of the Senate Standing Committee on Science and the Environment, in their report Woodchips and the Environment, 1977.

Proposal 25 of the Standing Committee also urged Governments to give most serious consideration to the conservation status of forest flora and fauna, discouraging further projects involving clearfelling for woodchips if necessary.

Recommendation: The export licence should not be approved because the project proposes to subject to integrated logging areas which are on the Interim Register of the National Estate and should be added to the region's national park and nature reserve system.

5. IMPACT ON THE CROWN TIMBER RESOURCE

5.1

Approval for the project should not be granted because the proponents have failed to demonstrate that their projected pulpwood resource is available for harvesting in an environmentally acceptable manner.

Within the EIS and ENFMP '82 there are several differing estimates on just how much State Forest land will be subjected to integrated logging for pulpwood extraction.

The EIS, on pages 4.9-4.10, claims that of 279,000ha of State Forest in the Agreement Area, 97,000ha will be "excluded from logging" and "will be substantially unaffected by logging". This suggests 182,000ha will be used for integrated logging including pulpwood extraction.

However, Table 1.A.1, Appendix 1A of the E.I.S. lists the total area available for routine wood production within the Agreement Area as 231,900ha, and uses this area as the basis for calculating the pulpwood resource. By multiplying it with the estimated yield of 87.9 tonnes/hectare, pulpwood resource totalling 20,374,000 tonnes, was estimated, of which 6,891,000 tonnes has already been harvested, leaving 13,483,000 tonnes, which the proponents allocate to the provision of 530,000 tonnes per year until 2010, in Table 5.1 of the E.I.S. Appendix 1A states: "The resource estimates given above include volumes in those areas alongside streams which are now being left largely unlogged. The volume of pulpwood not utilised in stream-side situations amounts to some 2% of the original estimate of total pulpwood availability." This would reduce the original estimate by 407,480 tonnes, equivalent to 4636ha of unlogged forest, leaving, presumably, 227,300ha to be logged for pulpwood resource. Elsewhere, (e.g. in the ENFMP '82) the figure of 218,000ha is quoted as the area of State Forest available for pulpwood extraction.

The difference between the area of 231,900ha on which the pulpwood resource estimate was initially based, and the resource available from 182,000ha, represents 49,900ha, which is equivalent to over eight years' supply at 530,000 tonnes per annum.

The proponents do not acknowledge this deficiency. Instead the EIS claims (page 5.10) that "the prescribed yield of 530,000 tonnes per annum can be sustained until the year 2010 or the end of the 40-year first cutting cycle. Some pulpwood from thinning is expected to become available after the year 1995. The volumes have not been assessed at this time as sufficient data is not yet available on logging regrowth....The nett effect of the progressive switch in resources [from old growth resource to thinnings] is that the life of the old growth resource may be extended.....beyond 2010."

Thus, although the proponents refer here to a contribution to the pulpwood resource from thinnings, they admit (in section 5.3.1 of the E.I.S.) that insufficient research has been done by themselves or the Forestry Commission to provide accurate assessments of future thinnings volumes. The work of Bridges cited in the EIS and ENFMP '82 relates to thinnings trials in forest regenerating after fire rather than after integrated logging. Growth rates of regeneration after fire may be significantly different from those of regeneration after integrated logging.

In addition, the proponents admit (page 5.16, E.I.S.) that "there are still significant problems to be overcome before thinnings reach a stage of being competitive with other sources of chipwood."

Recher, Rohan-Jones and Smith recommended in 1980 that "a major research programme should be initiated as a matter of urgency into methods of thinning, silvicultural effects of different levels of thinning, and the use of smaller diameter logs for pulp." It is clear that the proponents have not considered this research important enough to have results available before applying for a renewal of their licence.

Thus, either the proponents have failed to demonstrate that the pulpwood resource is available, or they do not intend to follow environmental prescriptions. Approval for the export licence to the proponents should therefore be refused.

Approval of the project would contravene recommendation number 4 of the Senate Standing Committee on Science and the Environment in their 1977 report, Woodchips and the Environment, namely that-

"Renewal of licences for the export of woodchips be made conditional upon the assurance of means to ensure sufficient regeneration for future requirements, particularly on private land."

5.2

Approval for the project should not be granted because current forestry operations have resulted in overcutting of the sawlog resource beyond sustainable levels, and proposed operations will continue this process.

The proponents claim (EIS page 5.10) that "the often repeated charge that pulpwood harvesting in N.S.W. has hastened the demise of the sawmilling industry by chipping sawlogs and harvesting smaller potential sawlogs is not supported by fact. The proponents then cite management prescriptions, supervision procedures and licence conditions in support of this claim. (Appendix 10, cited as part of supervision procedures, was absent from the copy of the EIS supplied to the Environment Centre of N.S.W.).

However, the ENFMP '82 contains the following statements:

page 36 "It is apparent that sawlog commitments cannot be supplied in full by integrated sawlog/pulpwood logging operations aimed at meeting the pulpwood commitment."

page 36
-37 "There are sound reasons why the pulpwood allocation from the Management Area should not be increased. It would be desirable, therefore, on management grounds, to reduce the sawlog allocation to a level that can be supplied from integrated logging operations. The longer this adjustment is left the greater the reduction in yield that will ultimately be required."

page 36 "Actual yields [of sawlogs] have been greater than assessed." Figures quoted are 14.8m³ gross/ha actual cut compared with 12.1m³ gross/ha assessed volumes.

Appendix 1A of the EIS, Section 3, states, for the Eden District:

"Thirty-one percent of the assessed area has been logged in integrated sawlog/pulpwood operations since assessment. In this time about 32 percent of the adjusted assessed volume of pulpwood has been cut and about 39 per cent of the sawlog volume, indicating that yields of both products have been slightly higher than expected."

"Eden is the only District where logging has been almost completely integrated for the period under consideration. Actual pulpwood production per hectare has tallied closely with assessed yields. Actual sawlog production has been 26 per cent higher than assessed."

For the Bega District:

"...with 11 per cent of the area logged in integrated operations, 12 per cent of assessed pulpwood has been cut, and 17 per cent of sawlogs."

The ENFMP '82 also states:

page 35 "A very substantial reduction in yield is inevitable by the end of the initial cutting cycle. Whilst sustained yield is achievable in total wood production, the present levels of sawlog production cannot be sustained in the short term." (In fact, the table supplied shows the old growth sawlog crop being exhausted in 2002 at the present quota commitment level.)

page 36 "It is not possible at this stage to estimate the likely level of sawlog yield for the second cycle, but it is unlikely that 40 year old regrowth stands will be able to sustain the present yield."

This last statement is not surprising, considering that the estimated time needed for growth to sawlog quality is 80 years, possibly shortening to 50 years on the best sites. Inquiries to the Forestry Commissioner by the N.C.C. as to the sawlog resource after 2002 yielded a reply which referred us to the harvesting prescription (eg. page 60, ENFMP '82) which states -

"As a general rule, all trees considered capable of significant net merchantable value increment for economic harvesting during a subsequent cutting cycle shall be retained, except that such trees may be harvested as thinnings where the value increment of the stand will benefit."

We were invited to inspect the logging operations to confirm that "this prescription results in the retention of an appreciable number of such trees." No quantitative estimates of the extent of this future sawlog resource were provided.

Taken together, and in context, the statements above indicate that:-

either the pulpwood extraction operations have been allowed to determine a rate of timber extraction which has led to serious overcutting of the sawlog resource;

or timber volume estimates and/or forest management operations by the Forestry Commission of NSW are inadequate to ensure proper management of the Eden district's State Forests.

If the former is the case, then approval of a further export licence to HDA will see a continuation of overcutting of the sawlog resource, and will be the cause of the sawlog industry's demise.

If the latter is the case, the management of the Eden region's State Forests by the Forestry Commission of N.S.W., on which the HDA project depends, needs to be examined and revised before any consideration can be given to approval or otherwise of HDA's proposal.

5.3

Approval for the project should not be granted because HDA's proposed operations will leave State Forests in a condition where the sustainability of the operation through the second cutting cycle (2010-2050) has not been demonstrated

Sustainability of pulpwood and sawlog timber extraction beyond 2010 has not been demonstrated by the proponents, as evidenced in sections 5.1 and 5.2 above. The evidence presented indicates that present sawlog yields are not sustainable. The future pulpwood resource, heavily dependent on regeneration growth thinnings, has not been demonstrated; the only estimates presented (in Appendix 1E) are based on post-fire regeneration, not post-logging regeneration.

6. IMPACT ON THE NATIONAL ESTATE

Approval for the project should not be granted because it proposes logging which will destroy or impair values of National Estate areas.

As discussed in Section 7.1.10 of the E.I.S., four areas approved for listing on the Interim Register of the National Estate are affected by the proposal.

6.1

Nunnock Swamp Flora Reserve

Although reserved from logging by its existing Flora Reserve status, for its National Estate values to be preserved great care is needed in the fire management of the surrounding area. Proposed hazard reduction burning on a 3-5 year frequency, if allowed to escape into the Flora Reserve, could have a disastrous effect on the Reserve's rare Eucalyptus parviflora population. For the integrity of the swamp great care needs to be exercised in pulpwood extraction in its catchment; the EIS gives no details on this matter.

6.2

Nethercote Falls and Associated Rhyolite Outcrops

Although part of this area is classified under the PMPC system, it is surrounded by a pulpwood extraction area. The EIS does not give details on fire management procedures for the pulpwood extraction area which will ensure the preservation of the rare plants and vegetation communities of the area on the Interim Register.

6.3

Coolangubra Forest Area

Although the EIS claims the Forestry Commission has recognised the importance of the Waratah Creek area as arboreal mammal habitat, and classified it under the PMPC system, local observation reports that in fact the stippled area designated for Research on Fauna Values in Figure 7.6 was virtually all logged and subsequently designated as a faunal research area; except for the stippled area NW of the intersection between Wog Wog Way and Coolangubra Forest Way, which comprises a Eucalyptus nitens plantation.

In addition, the major part of the Coolangubra Forest Area on the Interim Register comprises a wilderness area, with which timber extraction operations are completely incompatible.

These examples demonstrate the inadequacy of protection which would be afforded to this area's National Estate values by continued management as State Forest. The Coolangubra Forest Area's wildlife and wilderness values must be protected by its dedication as a National Park.

6.4

Tantawangalo Creek Catchment

For this area any logging must be of secondary priority compared with the maintenance of the water quality values of the Tantawangalo catchment. The EIS claims (pages 7.36-7.37) this area represents considerable pulpwood and sawlog resource. However, this resource is not available, pending studies to be undertaken by a committee set up to report on whether wood production is compatible with water quality. The PMPC "Special Emphasis Catchment Protection" classification reflects the importance of protecting this area's stream values.

7. WILDERNESS

The export licence should not be approved because it is inexcusable that pulpwood harvesting operations which have compromised previously-identified Wilderness Areas should be allowed to continue to destroy more wilderness.

Discussion of wilderness in the EIS on pages 7.45-7.47 shows that pulpwood extraction managers have shown disregard for the wilderness areas defined in the report of Helman et al (1976). Buffer zones for the Nadgee, Genoa and Brogo Wilderness Areas, and the core of the Genoa Wilderness Area have all been compromised by pulpwood harvesting operations. The EIS proponents show a similar disregard for the classification of the Coolangubra Wilderness Area.

8. ENVIRONMENT PROTECTION, MONITORING AND REVIEW

The EIS gives insufficient information on how environmental protection measures will be monitored for their effectiveness, especially in the publicly-owned state forests. The proponents mention in Section 10 several "prescriptions" which will be followed as environment protection measures, notably for soil erosion, for maintenance of non-wood values, and for wildlife. The EIS admits (page 10.15) that "supervision and control of operations are of fundamental importance in maintaining the standards of harvesting and rehabilitation work."

The Senate Standing Committee on Science and the Environment, in its 1977 Inquiry into Woodchips and the Environment recommended that:

"Renewal of existing licences for the export of woodchips be granted only when it can be shown that implementation of environmental protection measures laid down by forestry authorities, as amended from time to time in the light of new knowledge, is fully effective."

Despite this important conclusion, the E.I. S. fails to give detail on how monitoring procedures have improved in effectiveness since 1977. It admits that "the standard of implementation of snig track drainage prescriptions varied between operations." Mention is made of a training course in "harvesting" techniques provided for operators, some modifications to environmental protection prescriptions, and figures are given (page 4.47) for penalties for breaches of licence conditions (201 warnings, 93 suspensions and 1 life banning).

These indicate that a significant amount of breaching of environmental protection provisions has occurred in the past.

The Standing Committee also concluded in 1977:

- 2.2.37 The Committee is not satisfied that forestry authorities are doing all that could reasonably be expected in the way of ensuring that existing environmental protection prescriptions are correctly implemented in the forest.
- 2.2.39 Even where well established prescriptions exist, it is evident that management structures and lines of responsibility for their practical implementation are for the most part either poorly delineated or only partially effective. This is a problem requiring resolution at the highest management level.
- 2.2.40 Worthwhile and really effective environmental protection must have its origin in a recognition by senior management of its importance.
- 2.2.43 With the exception of a few areas, the Committee is not satisfied that the importance of environmental protection is properly understood by those whose responsibility it is to carry out the protection work in the forest.
- 2.2.47 Without real incentive or control, forest management practices for environmental protection will operate at a minimum standard.

The Commission's Wildlife Policy for the Eden Region is often cited as demonstrating the Commission's ability to manage the forests for wildlife conservation. However, the Policy by itself is useless without effective policing and monitoring. Prescriptions relating to filter strips need to be policed because of the temptation to logging contractors paid piecework rates to fell large profitable trees in gully sites. The effectiveness of the habitat tree prescription in conserving wildlife needs to be monitored. This type of monitoring is not amongst those listed as being undertaken routinely in Section 10.5.1 of the E.I.S. How is the effectiveness of the Wildlife Policy monitored?

In order to give an accurate assessment of environmental impact in the future, the EIS needs to contain more information from the Forestry Commission on past adherence to environmental protection prescriptions and precise specifications as to how breaches would be prevented in the future. A programme monitoring the effectiveness of environmental protection prescriptions also needs to be undertaken.

Environmental protection measures applying to pulpwood extraction from private land also need to be considerably upgraded.

9. ALTERNATIVES NOT CONSIDERED ADEQUATELY IN THE E.I.S.

Federal legislation requires that the EIS "assess the potential impact on the environment of the proposed action and any feasible and prudent alternative to the proposed action." This EIS is deficient because the following alternatives and their impacts have not been adequately discussed and assessed.

9.1

Hardwood plantations for the supply of woodchips

The EIS devotes only half a page to dismissing this alternative (on page 6.4) without providing any justification. Although trial eucalypt plantations have been established since the early 1970's, no data from these trials are given. Data from successful Eucalyptus grandis plantations which the Forestry Commission has purchased on the north coast could provide useful information, but are not mentioned.

The impacts of hardwood plantations in terms of:-

- . better utilisation of already-cleared land
- . reduction of environmental impact on native forest
- . provision of employment

are not even alluded to.

9.2

Use of forest thinning, combined with sawmill residues, as the woodchip resource.

Insufficient work has been done on the feasibility of using thinnings for the bulk of the woodchip quota. In 1980 Recher, Rohan-Jones and Smith (reference under "Wildlife" above) recommended to the Forestry Commission that:

1. An increasing amount of pulpwood should be taken as thinnings from logging and fire regeneration. A major research program should be initiated as a matter of urgency into methods of thinnings, silvicultural effects of different levels of thinning, and the use of smaller diameter logs for pulp.
2. A greater proportion of wood should be used from each tree, and the range of wood products extended. Whole tree logging and on-site chipping should be thoroughly investigated with the economics of the operation evaluated in consideration of the likely benefits to wildlife from the diversification of the logging rotation system.

This work should have been carried out by now and its results included for discussion in the EIS. No work on recommendation 1. appears to have been done by the proponents, and work on 2. is only just being initiated (page 6.2).

9.3

Lower chip volumes

The E.I.S. should contain a much more detailed review of alternatives to the logging of the proposed National Parks and National Estate areas.

The E.I.S. states that the exclusion of logging from areas which are on the Interim Register of the National Estate and have been nominated as national parks, notably Coolangubra and Tantawangalo, will reduce the pulpwood resource by 172,900 tonnes (page 6.7). The E.I.S. claims (page 9.7) that this will reduce the woodchip mill from a two-shift to a one-shift operation, thus reducing employment. A two-shift operation requires 715,000 tonnes per annum (page 9.7); the proponents are applying for 850,000 tonnes per annum altogether, and claim the mill would cease to be viable at 600,000 tonnes.

The EIS does not make explicit the fact that if the proposed National Estate areas were excluded from logging, a maximum of less than 40,000 tonnes per annum would have to be found from additional sources in order to allow the mill to operate just above the minimum two-shift level.

One alternative source for this 40,000 tonnes could be other Forestry Commission areas outside the current Agreement Area, if it can be shown that the substituted areas are less environmentally valuable than the National Estate areas. Another possibility is that of more intensive and efficient management of existing forests, leading to a higher productivity per hectare. Plantation sources should also be considered. The E.I.S. fails to examine in detail the important question of alternative sources.

9.4

Alternative uses of the timber resource

Alternative uses of the timber resource, involving development of timber-based industries which involve increased processing and therefore employment in the region, should be considered in detail in the E.I.S. The scribmer process is the only alternative mentioned, as a vague future possibility, on page 6.6

1982 employment figures for the Eden region (Bega Valley and Bombala Shires) showed that forest-based industry provided nearly 600 jobs (6% of the regional workforce). Woodchipping provides very little employment for the volume of timber used. Table 1.A.1, Appendix 1A of the EIS suggests woodchipping is using up about nine times more wood from old growth forest than sawlogging. However, direct employment in the woodchip mill is slightly less than in sawmills. Taking into account logging jobs, woodchipping still employs less than twice as many people as sawmilling.

Future employment prospects for many timber industry workers, especially in sawmilling, are not good, because, as outlined above under Section 5, the sawlog cut has been above sustainable yield levels. This is confirmed on pages 35 and 36 of the ENFMP '82. The table on page 35 of that document, (repeated in Appendix 1A of the EIS), shows that current sawlog commitments can only be met up to the year 2002 from the old growth sawlog crop, and the Management Plan states:-

"A very substantial reduction in sawlog yield is inevitable by the end of the initial cutting cycle" (page 35) and "...it is evident that the present sawlog cutting cycle will end before the present pulpwood cycle at existing rates of yield" (page 36).

Thus it is apparent that the woodchipping operation, though providing employment itself, has been contributing to the depletion of resource for the more employment-generating sawlog industry.

One would think that forest-based industries which made much better use of the timber resource in terms of job creation, would be of prime importance to planners and decision-makers with the welfare of the region at heart.

9.5

Tourism

Despite the fact that tourism is one of the most important employment-generating growth industries in the state, the EIS allots very little attention to it (pages 6.8, 7.56, 8.81). The possibility of increasing

regional tourism by increasing the forest areas reserved for conservation is dismissed in one sentence on page 6.9, with no provision of justifying figures.

Elsewhere in the state the creation of national parks has provided a major stimulus to tourism. Conservative estimates of total annual numbers of visits to National Parks and Wildlife Service areas in N.S.W. have indicated a steady increase from 13.8 million in 1980-81 to 14.9 million in 1983-84. The 1983-84 estimates for several inland parks in the north coast region include over 18,000 visits to the Border Ranges National Park, over 45,000 to New England National Park, and well over 60,000 to Dorrigo National Park. Such an influx of people and outside income cannot help but generate employment and other socio-economic benefits at both the local and regional level. When the EIS proponents dismiss tourism as unlikely to provide a feasible alternative to the woodchipping industry (page 3.82), this claim should be set in its proper context by comparison with the adverse economic effects due to loss of tourism resulting from destruction of natural areas. If the national parks inland from Eden are considered unable to attract large numbers of tourists, their small size should be compared with that of the larger inland northern national parks which attracted the visitation figures above. The N.C.C.'s recommendations in this submission for additional national park reservations would help to remedy any lack of attraction which may be due to small size.

10. OTHER INADEQUACIES OF THE E.I.S.

The requirements of an E.I.S. under the Commonwealth legislation, under which this EIS is being assessed, include the following:

"S.4.1 To the extent appropriate in the circumstances of the case, an environmental impact statement shall -

- (f) include information and technical data adequate to permit a careful assessment of the impact on the environment of the proposed action:
- (h) assess the potential impact on the environment of the proposed action, including, in particular, the primary, secondary, short-term, long-term, adverse and beneficial effects on the environment of the proposed action and of any feasible or prudent alternative to the proposed action."

However, despite these requirements, the E.I.S. on page iii says: "In some instances it was not possible to assess accurately the impact of the proposal through a lack of information. As with any document of this type it must be produced using information available at the time."

This approach taken by the EIS proponents is quite inadequate; the legislative requirements do not say that environmental impact assessment can be confined to information already available. If sufficient information is not available on which to base a decision, it must be obtained before the proposal is considered.

Examples where insufficient information is provided to enable impacts to be assessed include the topics discussed below.

10.1

Inclusion of uncertain timber resource

The Tantawangalo Creek catchment is the subject of study for a special committee, the Tantawangalo Committee, set up to determine whether logging can

proceed in this catchment at all, and if so, under what conditions. This committee has not yet made a decision on whether or not logging will proceed (EIS Appendix 6A, and page 7.37).

However, Section 6.2.3.1 of the EIS claims that the Tantawangalo Creek Catchment area nominated for the National Estate represents a significant proportion of the pulpwood and sawlog resource potentially foregone if National Estate areas were to be excluded from harvesting. This contribution to the timber resource is misleadingly portrayed by the proponents in Section 9.5.2.2 as though it is automatically available.

The N.C.C. recommends that the National Estate values of the Tantawangalo Creek catchment be preserved by its dedication as part of the Tantawangalo National Park.

10.2

Water

The EIS contains insufficient discussion on the long-term and wide-ranging effects of woodchipping operations which will involve large-scale alteration to soil surface characteristics, soil moisture retention capability, and transpiration regime. These changes are likely to have the following effects on streams which traverse catchments subjected to integrated logging-

- . stormflow peaks will be increased
- . persistence of streamflow in drought times will be decreased
- . erosion of streambanks and increased siltation downstream.

These effects will have impacts on-

- . agriculture downstream of woodchipping operations
- . water availability for town water supplies
- . estuarine industry dependent on good water quality
- . natural ecosystems.

The proponents have failed to provide an adequate assessment of these pervasive impacts of the project.

10.3

Soils

Although a geological map is presented in the EIS, the soils of the Eden region have not been mapped at a regional scale, except along the western boundary, and there seems to have been very little attempt in the EIS to relate future growth rates of the timber resource to different levels of soil fertility arising from different soil types.

10.4

Fire

The proponents continue to claim that improved access resulting from forest roading accompanying the woodchip operation will assist in suppression of wildfires. They have neglected to claim credit for one of the worst wildfires in recent years, when in 1980 a smouldering bark dump in Timbillica State Forest developed rapidly into a fire which burnt out 46,000ha of State Forest and Nature Reserve within a few hours. This fire started directly as a result of forestry operations, and the "improved access" via forest roading was unable to assure its control despite initial attack within 25 minutes.

In fact, forestry roading also provides improved access and opportunities for pyromaniacs, careless picnickers, and other people likely to increase the number of fires started. This impact is not considered in the EIS, although figures on causes of ignition are obtainable from fire protection authorities.

Like the Timbillica bark dump, the proponents are also proposing to inflict an insidious fire hazard on the region in the form of vast areas of densely-regenerating regrowth forest. This regrowth will carry heavy fine fuel loads, be susceptible to death itself if burnt when younger than 20 years, and create great difficulties for fire suppression if it catches alight when 10-15 years old. There is an inherent incompatibility between these constraints and the Forestry Commission's 1982 Fire Management Policy (ENFMP Appendix 26) of 3-5-yearly hazard reduction burning, which the EIS's Fire Behaviour consultant has understandably had considerable difficulty in trying to resolve (EIS page 8.23).

Thus, the EIS contains insufficient information on:

- i) the extent of increase in fire hazard the project will cause for the region;
- ii) the doubt this creates about the magnitude of the future pulpwood resource, and
- iii) the effect of proposed hazard reduction procedures on species conservation in this extensive forest area.

10.5

Vegetation

The Terrestrial Flora consultant highlights in Section 7.1.4 some of the deficiencies of the information on vegetation available in the EIS, as follows-

"No detailed vegetation map is available for the Eden management area...which will provide the bulk of the woodchips. In the opinion of the author, this is a major deficiency."

"The available information on the vegetation is very patchy. No comprehensive survey of the entire area has yet been carried out such that the subtler patterns of plant distribution can be documented, and sites of particular botanical significance identified. In the opinion of the author, such a survey is urgently needed if the adequacy of the existing reserve system is to be properly assessed. The lack of information for the Eden region contrasts poorly with the detailed information available for the adjacent forests of East Gippsland and systematic pre-logging flora and fauna surveys now being carried out in those forests."

The 1977 recommendation of the Senate Standing Committee on Science and the Environment, that export licences be approved only where necessary steps have been taken to adequately conserve flora and fauna species of the proposed area, has been quoted earlier in this submission.

In addition, the following important research areas need to be addressed, in the opinion of the vegetation consultant:-

- . effects of logging and fire on understorey vegetation
- . population biology of individual understorey species.

Because of the lack of a comprehensive vegetation survey, it is likely that there are many populations of rare and endangered plants in the region additional to the 10 listed in the Crown forests. Research by David Albrecht, of the National Herbarium, Melbourne, and others, suggests this is the case. For example, an undescribed species of Eucalypt occurs as a canopy dominant in parts of Coolangubra S.F. and Rockton section of Bondi S.F. This species has similarities to E. polyanthemus, which normally occurs west of the Great Dividing Range, and appears limited in distribution.

The Forestry Commission and EIS list 19 vegetation types as "forest types", a classification based on dominants of economic importance. An example of an alliance not listed in the EIS is the Melaleuca amylaris-Kunzea ambigua community which occurs specifically on rhyolite outcrops, and contains rare species.

Deficiencies in the vegetation information supplied by the Forestry Commission and the EIS are indicated by comparison with the number of vegetation associations listed for the region by the National Parks and Wildlife Service of NSW, which we understand to be close to 90.

11. FUNDAMENTAL INADEQUACY OF THE E.I.S.

It is not possible to assess the full environmental impact of the proposed woodchip operations from this E.I.S. because forestry operations are largely under the control of the Forestry Commission of N.S.W., which has not contributed to the E.I.S. as a proponent. The following quotes from the introductory section, The Role of the E.I.S., page i, illustrate the situation.

"HDA (Harris-Daishowa (Australia) Pty Ltd), while nominated as the proponent of the continued woodchip operations, has little direct control over many of the aspects of the proposed operations as discussed in the document."

"The FCNSW (Forestry Commission of NSW) is responsible for all aspects of Crown forest management including planning, supervision, research, fire control and road construction."

"Accordingly, as distinct from most E.I.S.'s, the proponent (HDA) is unable to give undertakings concerning those aspects of the operation which are not under its control."

Areas where insufficient information has been provided to assess environmental impact include:-

- . allocation of timber resource;
- . supervision, control and monitoring of environmental protection measures; and
- . details on commitment to undertake environmental research and make research results publicly available.

Therefore, the Nature Conservation Council of N.S.W. recommends most strongly that approval of the export licence to the proponents be refused, on the grounds that the full environmental impact of the proposal cannot be assessed unless the Forestry Commission of N.S.W. submits an E.I.S for assessment as joint proponent under Part V of the New South Wales Environmental Planning and Assessment Act, or participates in a public inquiry with format and terms of reference which will allow comprehensive assessment of all the matters discussed in this submission.

Prepared by
Jocelyn Howell
PROJECT OFFICER
28.7.86

LITERATURE CITED

Forestry Commission of N.S.W., 1982, Eden Native Forest Management Plan.

Forestry Commission of N.S.W., Sydney.

Helman, Peter M., Jones, Alan D., Pigram, John J., and Smith, Jeremy M.B., 1976. Wilderness in Australia, U.N.E., Armidale.

Recher, Harry F., Rohan-Jones, Wyn and Smith, Peter, 1980, Effects of the Eden Woodchip Industry on Terrestrial Vertebrates with Recommendations for Management, Research Note No.42, Forestry Commission of N.S.W., Sydney.

Senate Standing Committee on Science and the Environment, 1977, Woodchips and the Environment, A.G.P.S., Canberra.

Woodchipping has powerful economics backing it up but it is based on short term profit. On the one hand is the forest industry's Strategy - where over-cutting leads to mill closures and increasing mechanisation - few jobs disappear. Economists estimate several hundred jobs will go.

However, the conservation movement has found viable economic solutions, as in the dispute over the State's rainforests. Alternative ~~g~~ timbers and long-term strategies are available to protect the forests and jobs.

WRITE NOW!

JOINT GROUP LETTER TO CONSERVATIONISTS IN MARGINAL ELECTORATES

EDEN WOODCHIP _ YOUR LETTERS NEEDED NOW!

The Federal and State Governments are rapidly moving to a decision on the future of the Eden woodchip project. You live in a marginal electorate and a letter from you to your local member of parliament and Ministers is especially important to the survival of your forest heritage.

The Threat

NSW or Oz?

Already half of the South-East has been clearfelled. Areas such as Tantawangalo and Coolangubra, now ^{proposed as Nat Parks} on the interim Register of the National Estate, are next.

They ~~These two proposed national parks~~ ^{both areas have already been placed on the Nat Estate Regist} contain the largest and most diverse aboreal mammal populations in the world. ^{They (one of)} are the source of wild rivers ^{WAC supply} for the often

drought-stricken South East. Many rare types of plants and animals, corridors of rainforest and wilderness survive ^{in Tantawangalo & Coolangubra} there. The Australian Heritage Commission

says: "The only way to protect the national estate values is to exclude forestry from national estate places." (Eden submission 1986).

Many of the environmental protection policies ^{of who?} have been shown to be a sham.

The woodchippers log 'protection corridors' and stream 'buffer' strips; remnant vegetation is burnt and many small rich gully habitats destroyed.

THIS IS HAPPENING IN 400,000 HECTARES OF AUSTRALIA'S BEST FOREST AND THERE ARE PROPOSALS TO EXTEND IT TO ONE MILLION HECTARES.

? diminishing?
precious?

The Solution

^{is backed by forces} Woodchipping ^{has} powerful economic ^{backing it up} backing it up. But the conservation movement has found viable economic solutions, ^{it did} as in the dispute over the state's rainforests. Alternative timbers and ^{economic} strategies are available. (see enclosed).

also Opposed to the conservation plan is the forest industry's strategy ^{where} ^{where} overcutting ^{and} ^{leads to} mill closures, ^{and} increasing mechanisation sees jobs disappear. Economists estimate several hundred jobs will go in the next twenty years.

YOUR LETTER AND SUPPORT WILL NOT ONLY PROTECT THE ENVIRONMENT BUT ALSO JOBS.

WRITE NOW!

Signed.....ACF NPA TWS TEC FSCEG TVCPA CASERAC FFA FOE GREENPEACE

YES I WANT TO ALSO GO ON A DEPUTATION TO MY MP!

Send to the South East Forest Alliance, c/ Total Environment Centre, 18 Argyle St, Sydney, 2000

NAME/ ADDRESS ETC

Anticipated
Pulpwood
Production:
'000 tonnes
per year (1)

Approach 1: Maintain Woodchip Production (3)

Approach 2: Minimum viable woodchip operation (4)

Approach 3: Sustainable Yields (5)

Source	1986/7	Pulpwood Production: '000 tonnes per year					Pulpwood Production: '000 tonnes per year					Pulpwood Production: '000 tonnes per year				
		1987 -1991 (4 years)	1991 -1996	1996 -2001	2001 -2006	2006 -2009 (3 years)	1987 -1991 (4 years)	1991 -1996	1996 -2001	2001 -2006	2006 -2009 (3 years)	1987 -1991 (4 years)	1991 -1996	1996 -2001	2001 -2006	2006 -2009 (3 years)
Mature Forest - Eden Region	530	411	461	318	309	307	268	297	158	158	158	50	50	50	50	50
Eden Sawmill Waste	33	23	25	18	17	17	14	17	9	9	8	3	3	3	3	3
Thinnings	-	-	-	170	182	189	-	-	170	182	189	-	-	170	182	189
Private Forests	110	100	90	90	90	90	100	100	97	87	86	75	125	90	90	90
Other Hardwood (2)	253	253	201	191	189	184	253	201	191	189	184	253	201	191	189	184
Total Hardwood Pulpwood	926	787	787	787	787	787	625	625	625	625	625	381	379	504	514	516
Net Woodchips Available	889	756	756	756	756	756	600	600	600	600	600	366	364	484	493	496
Pine Pulpwood	-	94	94	94	94	94	-	-	-	-	-	234	236	116	107	104
Total Pulpwood	889	850	850	850	850	850	600	600	600	600	600	600	600	600	600	600
Sawlogs ('000 m ³)	73	57	67	44	43	42	36	40	22	22	22	7	7	7	7	7

Notes: 1: HDA, 1986, p. 5-2

2: "Other hardwood" is pulpwood from Badja, Narooma and Bateman's Bay Districts and sawmill waste from Victorian and NSW sawmills (except Eden Region sawmills).

3: See Section 5.1

4: See Section 5.2

5: See Section 5.3

NOT TO BE QUOTED

ELEMENTS OF A SOUTH EAST WOODCHIP DECISION TO PROTECT LONG TERM
EMPLOYMENT AND THE ENVIRONMENT

1/ Recognition that the current south east timber strategy of the NSW Forestry Commission will lead to the loss of several hundred jobs and falling hardwood timber production for up to forty years. This is due to overcutting and the use of machines to replace jobs. (see attached for further data).

2/ A timber cutting cycle dominated by sawlog production (115years) should be introduced to replace the current (and for much of the area, future) pulpwood cycle of 30-40 years. Eucalypt plantations should also be established. *where?* Pine sawlogs from the Bombala Plantations can be used to compensate for the cuts in hardwood sawlog quotas required to achieve long term sustained yield. The woodchip project could achieve a quota of 600,000tonnes through the use of pine and hardwood thinnings, sawmill waste, logging residues and private property timber. This is the minimum viable mill level according to the company. If unacceptable to Daishowa, the resource should be put up for tender. Pine sawlogs and thinnings are available for the current cutting cycle from 1996 onwards. Removal of thinnings will stimulate sawlog growth. In the case of hardwood thinnings from native forests already chipped, their removal will reduce the fire risk from regrowth. But the taking of thinnings would require an environmental impact statement.

(See attached for further data)

3/ Gazettal of the proposed national parks and extensions to protect water catchment, environmental and tourist values:

- Tantawangalo
- Coolangubra
- Cathcart
- upper Merrica River
- extensions to Egan peaks Nature Reserve and Mt Imlay National Park.

4/ The development of tourist facilities near the new parks with government assistance to developers and economic stimulation of local towns to further attract the retirement and young family migrants.

5/ The least environmentally sensitive areas should be logged first, with a review of nature conservation needs and environment protection measures with a view to further protection as research indicates.

6/ The woodchip license should be renewed (based on resources in 2/) for ten years only. Annual reports should be presented with public review of issues of concern. Before renewal of the license in 2000 there should be a public inquiry.

7/ There should be reform of the NSW Forestry Commission to reduce the polarised nature of the forestry debate and improve the political stability of resource allocation decisions, including:

- formal public involvement in management plans
- third party enforcement of forest practises regulations
- a community-based Forests Advisory Council responsible to the Minister
- strict environmental controls on the logging of private lands

(Further recommendations are found in 'The NSW Forestry Act - A Review' 1985)

EDEN MANAGEMENT AREA

JOB LOSSES DUE TO MECHANISATION

<u>Date</u>	<u>Mill</u>	<u>Logging</u>	<u>Wdchip Mill</u>
1974-85	70 (20% of 1974 jobs)	100 (29% of 1974 jobs)	
1985-2004 (assuming 2%pa loss as compared to previous 5.7%pa)	37 (30% of existing jobs)	97 (20% of existing jobs)	50 (37% of existing jobs)

SAWMILLING JOB LOSSES 1986-2004 . Current Jobs 125

<u>Due to: Mechanisation/Loss of Yield</u>	<u>National Parks</u>
111	6

4 August, 1986

The Hon. R.J. Carr, M.P.,
Minister for Planning
and Environment,
1 Oxford Street,
DARLINGHURST NSW 2010

Dear Mr Carr,

re: Eden Woodchip Issue

Attached for your attention is a copy of the Nature Conservation Council of New South Wales' submission on Harris-Daishowa (Australia) Pty Ltd's Environmental Impact Statement for the Eden Export Woodchip Operation 1989-2009.

Council's submission recommends against the ~~granting~~ of an export licence after 1989 to Harris-Daishowa (Aust.) Pty Ltd based on the present proposal, for a number of sound reasons. Council's overriding concern is that native forest ecosystems will be destroyed, without their adequate representation in biologically viable conservation reserves, as part of an unsustainable timber extraction operation. Council's submission gives reasons for the basis of this concern.

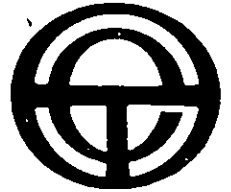
Council submits that the full environmental impact of the proposal cannot be assessed unless the Forestry Commission of N.S.W. releases an E.I.S. for public consideration as joint proponent under Part V of the New South Wales Environmental Planning and Assessment Act, or participation^{ES} in a public inquiry with format and terms of reference which will allow comprehensive assessment of all the matters raised in the accompanying submission, and in the submission of the South East Forest Alliance.

Yours sincerely

Judy Messer
CHAIRPERSON

Jim S.

TOTAL ENVIRONMENT CENTRE
18 Argyle St., Sydney, N.S.W. 2000. Phone 27 4714



24 September 1986

Judy Messer
National Conservation Council of NSW
57 Wentworth Ave
DARLINGHURST NSW 2010

Dear Judy

SOUTH - EAST WOODCHIP DECISION

I am writing in regard to two major developments in the woodchip campaign, with the federal government timetabling a decision a few months from now.

1. The Economic Reports

These are virtually complete. As a result, I enclose some proposals which detail and amend our current policy. Of particular note is the granting of an export license and the use of hardwood thinnings (albeit qualified). At some stage we would need to announce this and circulate it to the government. (It is somewhat akin to the alternative timber resources strategy in the rainforest decision.)

I propose we meet to discuss the political and other ramifications on October 10, at 3pm at TEC. This is before the Carr and Unsworth meetings. I will also be meeting the local groups on September 26.

2. Marginal Electorates Campaign

SEFA has now employed Katrina Bard to organise conservation pressure on marginal MP's. Part of the effort will involve a joint appeal by groups to conservationists. I enclose a draft letter which we plan to distribute with a new brochure in late October.

Could you please review it and we can give it the final going-over on October 10.

Looking forward to seeing you.

Regards

Jeff Angel

TELEX

19 August, 1986

The Hon. B.J. Unsworth
Premier of New South Wales
Telex No. 21269

Dear Mr Unsworth,

The Nature Conservation Council of New South Wales urges you, as a demonstration of the government's commitment to environmental protection, to ensure that there is full opportunity for public participation in the assessment of all relevant aspects of Harris-Daishowa (Australia) Pty Ltd's Eden woodchip proposal. Council urges you to allow comprehensive public assessment by means of the provisions of the NSW Environmental Planning and Assessment Act of all relevant forestry management operations which are currently the responsibility of the Forestry Commission of NSW, and form an integral part of Harris-Daishowa's proposed project.

Council reiterates its call to you made in our letter of 14th August 1986, and requests that the government gives urgent attention to this matter.

Yours sincerely

Judy Messer
Chairperson
Nature Conservation Council of N.S.W.

Exec.



Premier of New South Wales
Australia

10 SEP 1986

29 AUG 1986

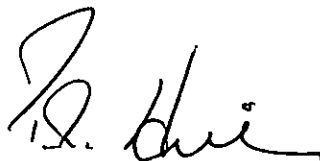
Dear Ms Messer,

I refer to your letter of 14th August on behalf of the Nature Conservation Council concerning the Eden woodchipping operations.

The Minister for Agriculture and Lands is currently consulting with the Minister for Planning and Environment and Heritage regarding the decision-making process at State level.

Accordingly, I have brought your Council's representations to the notice of the Ministers and you may be sure that the views expressed will be given careful consideration.

Yours sincerely,

for 
Premier.

Ms J. Messer,
Chairperson,
Nature Conservation Council
of New South Wales,
Level 1, 55-57 Wentworth Avenue,
SURRY HILLS. 2010

DEPARTMENT OF ARTS, HERITAGE AND ENVIRONMENT

GPO BOX 1252, CANBERRA, ACT 2601, TELEPHONE 467211, TELEX AA62960



13 AUG 1986

Ms J. Howell
Project Officer
Nature Conservation Council of NSW
Level 1, 55-57 Wentworth Ave
SURRY HILLS NSW 2010

Dear Ms Howell

I refer to your letter commenting on the draft Environmental Impact Statement (EIS) for a proposal to continue the export of woodchips from Eden, NSW beyond 1989.

Your comments have been forwarded to Harris-Daishowa (Australia) Pty Ltd, which is required by the Administrative Procedures under the Environment Protection (Impact of Proposals) Act to take into account public comments when preparing the final EIS.

Thank you for your interest in this important matter.

Yours sincerely

A handwritten signature in dark ink, appearing to read "I.D. Lamb".

I.D. Lamb
for Secretary

12 AUG 1986



OFFICE OF THE
MINISTER FOR ARTS, HERITAGE AND ENVIRONMENT

PARLIAMENT HOUSE, CANBERRA, A.C.T. 2600

19 AUG 1986

Ms J Messer
Chairperson
Nature Conservation Council of NSW
57 Wentworth Avenue
SURRY HILLS NSW 2010

20 AUG 1986

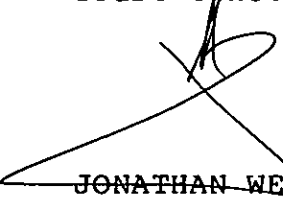
Dear Ms Messer

The Minister has asked me to thank you and reply on his behalf to your telex of 4 July 1986 requesting an extension of the public review period for the draft environmental impact statement (EIS) on the Harris Daishowa woodchip project.

The length of the public review period for the EIS was given very careful consideration, including taking full account of the issues raised in your telex. As a result it was decided to make the draft EIS available for a period of 8 weeks, or double the minimum period provided for in the legislation. This was considered to be an appropriate balance between giving the public a reasonable time to examine and comment on the EIS, while not unduly delaying government decision making. It is also consistent with the public review time allowed for the Tasmanian woodchip EIS last year.

You may be aware that, as a means of assisting conservation groups in the preparation of comments on the Harris Daishowa draft EIS, the Department of Arts, Heritage and Environment provided \$4000 in 1984/85 to the National Parks Association of the ACT to employ a project officer to collate existing information on the social, economic and environmental impacts of the Eden woodchip industry. The publication "Eden Woodchipping - a review" by Debbie Quarmby was the result of this grant. In addition, a grant of \$8000 was made to the Far South Coast Environment Group to prepare a response to the draft EIS.

Yours sincerely


JONATHAN WEST
PRIVATE SECRETARY

7 November, 1986

The Secretary,
Department of Arts, Heritage
and Environment,
G.P.O. Box 1252,
CANBERRA ACT 2601

Attention: Mrs A.M. White

Dear Secretary,

re: Forestry Commission Supplementary Document to Draft
E.I.S. on Woodchip Exports from Eden

Please find attached the Nature Conservation Council of New South Wales' submission on the above document.

Yours sincerely

Jocelyn Howell
PROJECT OFFICER

NATURE CONSERVATION COUNCIL OF NSW

THE NATURE CONSERVATION COUNCIL OF NSW
LEVEL 1, 55-57 WENTWORTH AVENUE,
SURRY HILLS, NSW 2010.
TELEPHONE (02) 211 5366. TELEX AA24041



SUBMISSION BY THE
NATURE CONSERVATION COUNCIL OF NEW SOUTH WALES ON THE
SUPPLEMENTARY DOCUMENT TO
HARRIS-DAISHOWA (AUSTRALIA) PTY LTD'S
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE EDEN (N.S.W.) WOODCHIP EXPORT OPERATION
FOR THE PERIOD 1989-2009,
PREPARED BY
FORESTRY COMMISSION OF NEW SOUTH WALES

7th November, 1986

1. Introduction

The following comments should be read in conjunction with the Nature Conservation Council of New South Wales' Submission on the preceding Draft Environmental Impact Statement prepared by Harris-Daishowa (Australia) Ltd. (HDA).

Many of Council's comments on the Forestry Commission's Supplementary Document are already covered in the publication "Forests and Jobs in Eden", by Keith Tarlo, published by the Total Environment Centre, Sydney, October 1986. Ideally this document should be read in conjunction with the present submission. As detailed (pages 8-9) in our previous submission on the Draft E.I.S., under Forestry Commission management the Eden forests have been subject to overcutting of the sawlog resource beyond sustainable levels, in tandem with pulpwood extraction. This problem of overcutting, along with maintenance of employment is addressed in Keith Tarlo's paper. Figures presented in the Forestry Commission's Supplementary Document, for example on page 19, showing a progressive reduction in the sawlog quota, confirm past and current overcutting.

We wish firstly to reiterate some of the main points made in the paper by Keith Tarlo.

2. Pulpwood Yields in the long term

We maintain that contrary to the view of HDA and the NSW Forestry Commission (F.C.) pulpwood yields from ENFMA (Eden Native Forest Management Area) cannot be sustained at 530,000 tonnes p.a. beyond the proposed 20 year cycle ie. 2010. The "Model" produced on p.124 of the F.C. Supplementary Document shows that required yields cannot be achieved in the medium term because thinning by its very nature will only remove part, not all of the regrowth.

Council contends that the Forestry Commission has failed to demonstrate the sustainability or viability of its proposed thinning operations. The Forestry Commission's claims on pages 33 and 34 of the Supplementary Document are unproven, as thinnings trials have not yet yielded sufficient data (HDA's EIS, pages 5.10 and 8.64).

Council refers the Department to the detailed critique of the Forestry Commission's thinnings claims contained on pages 14-15 of Keith Tarlo's paper.

3. Sawlog yields in the long term

Although quotas are to be reduced to 60,000 m³ per annum by 1988 to ensure that the mature forests last until the year 2010, the Forestry Commission merely states that there may be a need for further reduction of old growth yield at the end of this harvesting (page 33).

There is no quantification provided to support the Forestry Commission's claims on page 33 regarding sources of sawlogs after 2009. No figures giving estimates of resource from:

- . trees retained as sawlogs in the first cutting cycle
- . advanced regrowth from past fires
- . past sawlog harvesting in the Bega district, pre-1970

are provided. Considering the length of time for a sawlog tree to grow, 80-150 years, it is difficult indeed to see where sawlogs after 2009 will come from.

This is a major flaw in the woodchip proposal which is being glossed over by both HDA and the Forestry Commission. Council refers the Department to Section 3.2.3., page 16, of Keith Tarlo's paper.

These points 2 and 3 reinforce Sections 5.2 and 5.3 of our submission on the Draft E.I.S.

4. Effect of declaration of the proposed Coolangubra and Tantawangalo National Parks

The Forestry Commission claims (pages 43,44,129,130) that exclusion from harvesting of the Coolangubra and Tantawangalo areas listed on the Interim Register of the National Estate would have "enormous" and "disastrous" consequences for both the sawmill and pulpwood sectors. The claim is made on page 130 that the loss of the sawlog resource would mean the closure of two mills, and possibly three. However, in Table 9, page 43, the combined sawlog resource is estimated to represent only nine years' supply to the relevant mills. Despite this, on page 44 it is claimed that these two areas represent the major source of supply for the three mills (Bega, Nimmitabel, Bombala) between 1990 and 2010, that is, over a twenty-year period.

The Forestry Commission also claims that the Coolangubra and Tantawangalo National Estate areas represent significant contribution to the pulpwood resource, making them crucial parts of the woodchip operation. The Nature Conservation Council disputes this claim, which is in fact diminished by the Forestry Commission's own admissions on pages 45 and 129 that much of the Coolangubra and Tantawangalo areas could be economically viable for sawlogs alone.

This Council contends that the effect of the Forestry Commission's claim, that integrated logging of the Coolangubra and Tantawangalo nominated areas is a crucial part of the HDA woodchip operation, is to obscure the cause of the impending sawlog shortfall, namely, past and current overcutting beyond the sustainable level. Council refers the Department to Section 4.1 of Keith Tarlo's paper, page 21, which lists reasons for past and present trends in job losses. Tarlo's analysis on pages 19 and 20 shows that declaration of proposed Coolangubra and Tantawangalo National Parks, far from having "enormous social and economic impacts" (as claimed on page 44 of the Forestry Commission's Supplementary Document) would reduce the timber harvest by only 8% over the effect of implementing measures to ensure sustainability, and result in loss of only 16 jobs, directly attributable to the National Parks.

5. Area to be affected by pulpwood extraction operations

Section 5.1, pages 7-8, of our previous submission listed four different estimates for the area of forest to be subjected to integrated logging for pulpwood extraction, namely 182,000ha, 218,000ha, 227,300ha, and 231,900ha, which appear in different places in the ENFMP 82 and the E.I.S. The Forestry Commission's Supplementary Document gives a fifth figure, 201,935ha, in Table 1, page 12, (174,295 + 27,640).

It is impossible to assess the environmental impact of the proposal accurately when there are five different estimates of the amount of land to be affected!

6. Alternatives to the HDA/Forestry Commission Proposal

Council would like to commend the intention expressed in Section 5(ii) of the F.C.'s Supplementary Document regarding increased utilisation of material currently wasted; Council would see this as a desirable aim in the context of Approach 3 recommended below.

Regarding plantations, Council deplores the negative attitude towards establishment of hardwood plantations expressed by the Forestry Commission. Of course plantations are a long-term prospect; Council recommends that steps be taken now to establish hardwood plantations in the Eden region on already-cleared land. The costs of land purchase decried as too expensive should be compared with the expenditure by the Forestry Commission on infrastructure accompanying the existing HDA woodchip proposal. Council refers the Department to comments made in our previous submission under Section 9.1, page 13.

Finally but most importantly, Council refers the Department to the alternatives discussed in detail in Section 6 of Keith Tarlo's paper, and strongly recommends the adoption of Approach 3, Section 6.3, pages 35-38, for reasons of sustainability, employment prospects and environmental protection.

7. Places of National Estate Significance

This Council deplores the Forestry Commission's attempt to discredit the nominations of the Coolangubra Forest Area and the Tantawangalo Creek Catchment to the Register of the National Estate. These nominations were assessed by a multidisciplinary expert panel before proceeding, and have been accepted onto the Interim Register. In seeking to discredit statements made in support of the nominations, the Forestry Commission makes unsubstantiated and undocumented claims. For example, on page 85, item 9, re Tantawangalo Creek Catchment, in seeking to discredit the statement that "there is a diverse and dense bat population", the Forestry Commission claims:

"Speculation based on ten trap-nights. No scientific credibility. It is established only that eight species occur in the area".

"Forestry Commission recognises lack of any scientifically credible information on bats generally in the region. This will be covered in future research programmes."

In other words, while admitting it has done no research itself, the Forestry Commission attempts to discredit research which has been done!

We understand also that, while criticising the basis of these National Estate nominations, the Forestry Commission has taken from them a number of the rare plant species and incorporated them into its own list without acknowledgement.

8. Research

The Forestry Commission's attitude to flora and fauna research as presented in this Supplementary Document does not encourage confidence in the Commission's ability to manage the region's state forests for flora and fauna conservation. For example, on page 135, under Section 9(ii), Research, the following claim is made:

"The research effort at Eden is amongst the best in Australia, and the adequacy or otherwise of existing information must be judged in this context."

No evidence is provided to support this claim - the basis of the comparison is not described, nor the criteria on which the judgement is made. In the subsequent cataloguing of the Commission's research programme, a large proportion of the research items are not actually proceeding.

9. Impact on Wildlife, and Adequacy of the Region's Existing Conservation Reserves

The comments on these two topics on pages 3-6 of our Submission on HDA's Draft E.I.S. remain relevant after examination of the Supplementary Document. For example, the importance of filter strips of adequate size for wildlife needs was discussed in Section 3.2 of our previous submission. As the size of filter strips has not been specified on page 13 of the F.C. Supplementary Document, we presume they are as specified in the ENFMP '82 (Eden Native Forest Management Plan, 1982), and our comments in our previous submission about their inadequacy still apply. We refer the Department to Section 3 and 4 of our previous submission.

10. Conclusion

After examination of the Forestry Commission of New South Wales' Supplementary Document, this Council finds that deficiencies in information relating to the proposal still exist in the areas of:

- . future pulpwood and sawlog resources, and their allocation
- . pulpwood yield estimates from logging regrowth thinnings
- . forest management necessary for wildlife conservation
- . details on commitment to undertake environmental research, particularly in the area of flora and fauna, and to make results publicly available.

Council finds the Forestry Commission's attitude to certain National Estate nominations and Wilderness, as expressed in this document, most disappointing for a government authority.

Council recommends most strongly against approval of an export licence for the Harris-Daishowa (Australia) Pty Ltd woodchip project as proposed, because:

- . the project has not been demonstrated to be sustainable;
- . long-term survival of the region's native flora and fauna cannot be assured given the existing complement of conservation reserves and the forestry operations proposed.

Council recommends the adoption of Approach 3 described in the paper by Keith Tarlo entitled "Forests and Jobs in Eden", October 1986, for reasons of sustainability, employment prospects and environmental protection.

DEPARTMENT OF ARTS, HERITAGE AND ENVIRONMENT

GPO BOX 1252, CANBERRA, ACT 2601, TELEPHONE 467211, TELEX AA62960



Ms J. Howell
Project Officer
Nature Conservation Council of NSW
Level 1, 55-57 Wentworth Avenue
SURRY HILLS NSW 2010

29 SEP 1986

Dear Sir/Madam

Further to our earlier letter acknowledging receipt of your comments on the Harris-Daishowa draft environment impact statement (EIS) on woodchip exports from Eden after 1989, I am writing to advise you of a further report on this subject on which public comment is invited.

Following the recent public review of the draft EIS, the Minister for Primary Industry requested the NSW Government to provide more detailed information in relation to matters of forest management, and more specifically those aspects coming within the responsibilities of the Forestry Commission of NSW. The Forestry Commission has prepared a report containing this information to supplement the details given by Harris-Daishowa in the draft EIS.

This Supplementary Information Report will be available for public review from 29 September to 10 November 1986. I enclose for your information the text of a press advertisement advising the location of public display copies of the report, the address for the purchase of copies and inviting public comment to be sent to this Department by 10 November 1986.

All comments received will be forwarded to the Forestry Commission and Harris-Daishowa to be taken into account, together with comment received earlier on the draft EIS, in the preparation of a final EIS. Comments will be treated as public documents unless confidentiality is requested.

Yours sincerely

E.M. Anderson

E.M. Anderson
for Secretary

25 September 1986

NEWSPAPER ADVERTISEMENT

WOODCHIP EXPORTS FROM EDEN

Following preparation of a draft Environmental Impact Statement by Harris-Daishowa (Australia) Pty. Ltd. on woodchip exports from Eden from 1989 to 2009 pursuant to the Commonwealth Environment Protection (Impact of Proposals) Act, the Forestry Commission of N.S.W. has prepared a report containing Supplementary Information on forest management and resources on Crown Timber lands covered by the draft EIS.

The Supplementary Information Report, prepared to meet a request to the NSW Government by the Commonwealth Minister for Primary Industry, will be available for public review between 29th September, 1986 and 10th November, 1986

COPIES NOW AVAILABLE FOR PUBLIC EXAMINATION AT:

Department of Arts, Heritage
AND Environment
2nd Floor, CML Building
University Avenue
Canberra City ACT 2601

ENVIRONMENT CENTRES

Childers St. Building
Kingsley St.
Acton ACT 2601

1st Floor
57 Wentworth St.
Surry Hills NSW 2010

166 Ann St
Brisbane QLD 4000

102 Bathurst St.
Hobart TAS 7000

285 Little Lonsdale St.
Melbourne VIC 3000

120 Wakefield St
Adelaide SA 5000

794 Hay St.
Perth WA 6000

Shop 8
The Track, Smith Street Mall
Darwin NT 2794

Australian Conservation Foundation
672B Glenferrie Rd
Hawthorn VIC 3122

STATE LIBRARIES

40 James St.
Perth WA 6000

328 Swanston St.
Melbourne VIC 3000

Macquarie St.
Sydney NSW 2000

William St.
Brisbane QLD 4000

North Terrace
Adelaide SA 5000

91 Murray St
Hobart TAS 7000

Cavenagh St
Darwin NT 5790

TOWN LIBRARIES

Eden
Bega
Marimbula
Barmagui
Rateman's Bay
Moruya
Narooma
Orbost
Bombala

Copies of the report may be purchased for the sum of \$20.00 plus \$3.00 postage and packing from:-

Harris-Daishowa (Aust) Pty. Ltd. at
P.O. Box 189, EDEN 2551 or
Goldfields House, 1 Alfred St. SYDNEY 2000

Interested persons and organisations may forward written comments on the report to:

The Secretary
Department of Arts, Heritage & Environment
GPO Box 1252
CANBERRA ACT 2601

Attention: Mrs A M White

(062) 467 393

Comments should reach the above address by the 10th ^{November} October, 1986

All comments received will be forwarded to the Forestry Commission and to Harris-Daishowa to be taken into account, together with comment received earlier on the draft EIS, in the preparation of a Final EIS

Comments will be treated as public documents unless confidentiality is requested.

22 October, 1986

The Hon. J.R. Hallam, M.P.,
Minister for Agriculture and Lands,
11th Floor,
McKell Building,
Rawson Place,
HAYMARKET NSW 2000

Dear Mr Hallam,

re: Eden Woodchip Issue

The Nature Conservation Council of New South Wales has pleasure in forwarding to you a copy of its Forest Policy. This policy statement combines Council's many positive policies for the conservation and wise use of the state's forests and woodlands into one document.

Council would like to take this opportunity to reaffirm its opposition to integrated logging involving near or complete clearfelling, as set out in the Forest Policy. In our letter to you of 30th July, 1986, we described in detail the inherent conflicts between "integrated" logging practice and wildlife conservation.

Another major aspect of concern to Council in relation to the Eden woodchipping proposal is the impact of near or complete clearfelling on soils. The potential for soil erosion, and loss of forest productivity caused by soil compaction, should be of concern to all people and authorities involved in ensuring maintenance for the future of all values of the region's forests. This aspect was not adequately dealt with in the Environmental Impact Statement by Harris-Daishowa (Australia) Pty. Ltd because relevant management operations are under the control of the Forestry Commission of N.S.W. It seems there is no sound basis for management decisions regarding soils because, except along the western boundary, the soils of the Eden region have not been mapped at a regional scale. Inspections of the area, and scenes in the video presented at our meeting with you on 21st July, reinforce the belief that the importance of soil conservation in maintaining future forest health and productivity has not been allocated a sufficiently high priority in decisions on future management of the Eden region's forests.

Council urges you to ensure that this aspect of the Eden woodchip proposal, along with all other relevant issues, is accorded full public comment and accountability under the state's legislation designed to protect the environment. Council reiterates its request that you take action to initiate a public inquiry with format and terms of reference which will allow public assessment of all relevant forestry operations, or, alternatively, that you require the Forestry Commission of N.S.W. to submit an Environmental Impact

-2-

Statement covering its part in the project for assessment under Part V of the Environmental Planning and Assessment Act.

Yours sincerely

Judy Messer
CHAIRPERSON

Encl.

17 October, 1986

Mr Jeff Angel,
Total Environment Centre,
18 Argyle Street,
SYDNEY NSW 2000

Dear Jeff,

re: SEFA Meeting, Canberra, 25th October, 1986

As you know, it is very difficult for N.C.C. to be represented at the next SEFA meeting in Canberra because it clashes with our Annual Conference in Sydney.

It may be a help to policy-making at the SEFA meeting to have available a copy of N.C.C.'s Forest Policy. This policy document includes a statement of N.C.C.'s policy on Woodchipping, as well as on other issues which may arise in discussions. We would be very pleased if you could table the document at the SEFA meeting, in the absence of N.C.C. representation.

Thank you.

Yours sincerely

Jocelyn Howell
PROJECT OFFICER

End. 3 copies NCC Forest Policy.



RML 14899

NEW SOUTH WALES
MINISTER FOR PLANNING AND ENVIRONMENT

21 AUG 1986

Ms. J. Messer,
Chairperson,
Nature Conservation Council of NSW,
Level 1,
55-57 Wentworth Avenue,
SURRY HILLS 2010

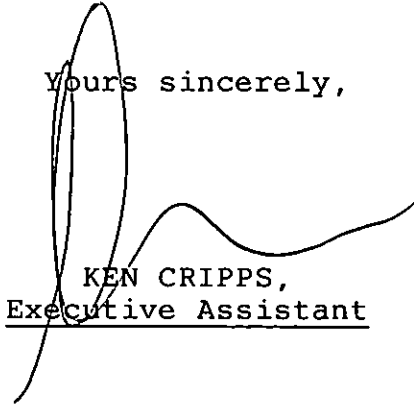
26 AUG 1986

Dear Ms. Messer,

The Minister has asked me to acknowledge your recent correspondence concerning Eden Woodchip issues.

The matters you have raised are presently under consideration and he will write to you as soon as possible.

Yours sincerely,


KEN CRIPPS,
Executive Assistant

TELEX

19 August, 1986

The Hon. B.J. Unsworth
Premier of New South Wales
Telex No. 21269

Dear Mr Unsworth,

The Nature Conservation Council of New South Wales urges you, as a demonstration of the government's commitment to environmental protection, to ensure that there is full opportunity for public participation in the assessment of all relevant aspects of Harris-Daishowa (Australia) Pty Ltd's Eden woodchip proposal. Council urges you to allow comprehensive public assessment by means of the provisions of the NSW Environmental Planning and Assessment Act of all relevant forestry management operations which are currently the responsibility of the Forestry Commission of NSW, and form an integral part of Harris-Daishowa's proposed project.

Council reiterates its call to you made in our letter of 14th August 1986, and requests that the government gives urgent attention to this matter.

Yours sincerely

Judy Messer
Chairperson
Nature Conservation Council of N.S.W.

14 August, 1986

The Hon. B.J. Unsworth, M.P.,
Premier of New South Wales,
State Office Block,
Phillip Street,
SYDNEY NSW 2000

Dear Mr Unsworth,

Thank you very much for your letter of 18th July, 1986, outlining aspects of the government's commitment to nature conservation and environmental protection.

One of the major items needing your government's urgent attention is the current proposal by Harris-Daishowa (Australia) Pty Ltd for continued woodchipping of the Eden region's native forests over the period 1989-2009. The project will affect between 200,000 and 250,000 hectares of publicly-owned native forests, and will be supported by publicly-funded management and infrastructure supplied by the Forestry Commission of N.S.W. Major impacts can be expected on many aspects of the environment, including the long-term survival of the region's flora and fauna and the quality and quantity of the region's water supplies.

Forestry Commission operations are an integral part of Harris-Daishowa's proposed project, yet these operations have not been subjected to public comment and accountability. Harris-Daishowa states plainly in its Environmental Impact Statement that it has little control over many of the aspects of the proposed operation.

In order to allow proper and adequate assessment of the full environmental impact of the proposed woodchip operations, public comment on Forestry Commission management procedures is essential.

The Nature Conservation Council of N.S.W. urges you, as a demonstration of the government's commitment to environmental protection, to allow wide public participation, by means of the provisions of the NSW Environmental Planning and Assessment Act, in the assessment of all aspects of the Eden woodchipping proposal, including those operations under the control of the Forestry Commission of N.S.W.

Yours sincerely

Judy Messer
CHAIRPERSON

30 July, 1986

The Hon. J.R. Hallam, M.P.,
Minister for Lands,
Ministerial Office,
11th Floor,
McKell Building,
Rawson Place
HAYMARKET NSW 2000

Dear Mr Hallam,

re: Eden Woodchip Issue

Thank you very much for providing the opportunity for discussions on the Eden woodchip project at the meeting on Monday 21st July with members of the Nature Conservation Council of N.S.W. and the Total Environment Centre, representing the South East Forest Alliance.

We would like to outline in a little more detail the nature of our concern about the conflict between current state forest management in the Eden area and conservation of forest ecosystems, with their constituent flora and fauna.

Our overriding concern in relation to the Eden woodchip operation proposed by Harris-Daishowa is that native forest ecosystems will be destroyed, without adequate representation in biologically viable conservation reserves, as part of an unsustainable timber extraction operation.

As mentioned in the video shown during the meeting Recher, Rohan-Jones and Smith (in their paper, Effects of the Eden Woodchip Industry on Terrestrial Vertebrates with Recommendations for Management, published by the Forestry Commission of NSW in 1980) concluded that "the existing National Parks and Nature Reserves in the Eden district are inadequate by themselves to ensure the survival of the region's wildlife." We agreed during the meeting with you that some forest management procedures had improved since the Eden woodchip operation began in 1969. However, these improvements are not sufficient to ensure conservation of the region's wildlife. There are inherent conflicts between integrated logging operations and flora and fauna conservation.

Firstly, although integrated logging is conducted on an "alternate coupe" basis, it is not possible or usual for most wildlife living in a logged coupe to find alternative homes in a neighbouring unlogged coupe because this area is already occupied. Secondly, food resources for wildlife are severely depleted when the bulk of the forest canopy is removed by integrated logging procedures. Thirdly, integrated logging practice does not ensure the preservation of the diversity of eucalypt and understorey species necessary to provide a year-round food resource for wildlife. Fourthly, although some habitat trees may be left in logged coupes, their survival is not guaranteed as they are subject to windthrow and damage once their surrounding forest cover is removed.

During our meeting you used the analogy of forests as "tree farms". The Nature Conservation Council of N.S.W. rejects the notion that forests are merely "tree farms". Properly managed forests are a living resource which can sustain ecosystems and species as well as being used for the benefit of humans - so long as all forest life and natural values are considered. The Nature Conservation Council does not accept that the major emphasis should be on wood production; it believes that N.S.W. forests have a multiplicity of uses and should be managed for:

- 1) conservation of ecosystems and species
- 2) protection of water quality and soil
- 3) wood for human use
- 4) recreation/tourism.

This belief is in accordance ^{with} widely held views on the nature and role of forests, including elements of the World Conservation Strategy, the National Conservation Strategy for Australia, and the N.S.W. Forestry Commission's Indigenous Forest Policy, 1976.

The state's native forests should at all times be managed so as to ensure conservation of ecosystems and species. As discussed during our meeting, the Harris-Daishowa operation proposes the first cutting cycle of the entire old growth forest to be completed within forty years, by 2010. Therefore the nature and extent of unlogged areas of old growth forest are of crucial importance to wildlife survival.

Recher, Rohan-Jones and Smith, after specific research into the effects of the Eden woodchip industry on forest birds and mammals, recommended in 1980 a number of management prescriptions necessary to help achieve the objective of species conservation. These recommendations have not all been followed in Forestry Commission management prescriptions. For example, Recher et al's recommendations for buffer strips included the following:

- . forty metres to either side of a watercourse should be the minimum width for buffer strips;
- . logging should be excluded from any part of the buffer strip;
- . buffer strips should be extended to the top of some drainage lines within each compartment.

Rather than support these management prescriptions in total, the Forestry Commission's Erosion Mitigation prescriptions in the Eden Native Forest Management Plan (1982), and in its October 1985 updating, specify that a filter strip shall be a minimum of 20 metres each side of a watercourse for slopes under 18°, increasing to 40 metres only where the fall into the watercourse is over 18°. Logs may be felled within the filter strip provided no part of the tree falls into the watercourse. Also, filter strips may be burnt as a result of post harvest burning operations.

Thus, it is misleading to regard filter strips as unlogged wildlife refuge areas. In fact, current prescriptions for filter strips appear to be weaker than those in force ten years ago, when no trees could be felled, nor logging machinery come within 40 metres of any stream with a catchment area greater than about 50 hectares. In addition, filter strips do not conserve habitats away from watercourses.

Preferred Management Priority Classification areas, which include areas set aside for wildlife, are cited in Harris-Daishowa's E.I.S. as contributing approximately 33,000 ha to areas excluded from harvesting, and described as "relatively undisturbed" or "substantially unaffected by logging". In fact, logging to modified prescriptions and/or hazard reduction burning is permitted in many PMPC categories.

Council reiterates its concern that the sustainability of the Harris-Daishowa existing and proposed woodchip operation has not been demonstrated in the E.I.S. or the Eden Native Forest Management Plan, 1982. This matter is pursued in Section 5 of N.C.C.'s submission on the E.I.S. A copy is attached for your perusal.

Suffice it to say, without further extending this letter, that it is of utmost concern to the Nature Conservation Council that the Harris-Daishowa woodchip proposal, while not being demonstrably sustainable, has severe implications both for the continuation of the sawmilling industry and the conservation of the south east region's wildlife.

We seek your assurance that, in your capacity as Minister for Lands, you will take action to ensure that the terms of reference for the forthcoming Inquiry into the Eden woodchipping industry will encompass all the issues raised in this letter.

Yours sincerely

Roger Lembit
VICE-CHAIRMAN

Encl.

Ex.



Minister for Agriculture and Fisheries
New South Wales

24 SEP 1986

19 SEP 1986

Ms. J. Messer,
Chairperson,
Nature Conservation Council
of New South Wales,
Level 1,
55-57 Wentworth Avenue,
SURRY HILLS. N.S.W. 2010 02.

Dear Ms. Messer,

Your letter of the 14th August, 1986, concerning the Eden woodchipping operations, has been referred to me by the Premier, the Hon. Barrie Unsworth, M.P.

The issues raised in your letter have been noted and will be taken into account when this matter is resolved.

Your interest in this matter is much appreciated.

Yours sincerely,

J. R. HALLAM, M.L.C.,
Minister for Agriculture
and Minister for Lands.

Exec.

03 OCT 1986



Minister for Agriculture and Fisheries
New South Wales

29 SEP 1986

Mr. R. Lembit,
Vice-Chairman,
Nature Conservation Council of N.S.W.,
Level 1,
55-57 Wentworth Avenue,
SURRY HILLS. N.S.W. 2010 02.

Dear Mr. Lembit,

Thank you for your letter of 30th July, 1986, and the copy of the submission by the Nature Conservation Council of N.S.W. on the draft Environmental Impact Statement, for a proposal to continue the export of woodchips from Eden beyond 1989.

The issues raised in your letter have been noted and will be taken into account when this matter is resolved.

Your interest in this matter is much appreciated.

Yours sincerely,

J. R. HALLAM, M.L.C.,
Minister for Agriculture
and Minister for Lands.

E.I.S.

APPENDIX B

**KEY AND EXTRACTS FROM NSW
GOVERNMENT LEGISLATION
RELATING TO TSRs**

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THE ENVIRONMENTAL EFFECTS OF WOODCHIPPING IN THE EDEN REGION

By Michael Harewood, B.Sc, Kiah, N.S.W.

The Woodchipped Forest

The integrated logging process currently practised in the Eden region involves the felling of over 90% of the salable trees in alternate 100 hectare coupes. Only 8 to 10% of the mature canopy remains, although a higher proportion may be left on some sites such as the bloodwood (*Eucalyptus gummifera*) dominated areas in, for example, the Lennards section.

Most of the logged area is disturbed by heavy machinery, with approximately 18% being completely bared of all litter and vegetation (Eden Native Forest Management Plan, 1982 p. 21). No particular care is taken to retain understorey vegetation, regardless of age or species.

Changes to Vegetation

In general terms, an open forest with a variety of ground, shrub layer and understorey plants and various age classes of eucalypts is replaced by a dense shrub level stand of vigorously competing seedlings of principally one single age class. While many ground cover, shrub and understorey species germinate and grow prolifically, the extreme competition provided by the grossly overstocked regenerating eucalypt stand, plus some of the most competitive understorey components, tends to cause the suppression of many species over time.

Prior to 1981, the logged areas were left to regenerate naturally. This resulted in the regeneration of around 5,000 stems per hectare of acceptable pulpwood species, 1,700 other eucalypts and over 1,500 acacias at 12 to 18 months (Bridges, 1983). About 32% of the eucalypt regeneration at 6 months was advanced seedlings not destroyed during logging.

Since this time, the practice of burning logging slash has been introduced. Although no data have been published for the Eden region, this might be expected to stimulate germination and increase seedling stocking rates by up to 5 fold, depending on seasonal conditions prevailing after the burn. Slash burning damages retained seedling and advanced growth components, understorey species and even retained seed and habitat trees. Trees retained in filter strips sometimes fall over due to wind exposure or a rise in the water table should a wet winter follow logging and burning. This narrows the range of age classes in the regenerating stand even further.

The old-growth forests are, by contrast, sparsely stocked with dominant eucalypts and of substantially heterogeneous age classes. Smith (1985) reported 61 mature trees (over 18 metres tall) per hectare on ridges and slopes and 43 per hectare in gully sites in Mumbulla State Forest. However, some exposed sites in the woodchip

concession have been so severely damaged in past wildfires that small areas of even-aged fire regeneration have developed. One stand of 1952 fire regeneration, for example, had 2,300 trees per hectare at age 25 years (E.N.F.M.P. 1982 p. 31). Most of the nearby area burnt in 1952 had, at the time of logging, a substantial older component which had recovered by epicormic budding and a lower stocking rate of 1952 seedlings of perhaps 200 per hectare.

The point is that the old growth forest is not all sparsely stocked. There are some (7,800 ha according to HDEIS Appendix 8E) even-aged fire regeneration stands. Most of the fire regeneration is not heavily stocked. Even after intense wildfire, the seedling stocking rate falls rapidly provided some old components recover. HDEIS Figure 5.1 badly misrepresents Bridges (1983) Figure 3 because the stocking rates Bridges used are from atypical 'hot spots' in past fires. The Woodchip Support Group argument has been:

- eucalypts naturally regenerate only after fire
- logging does the job of fire
- the greenies argument that logging regeneration is grossly overstocked is countered by Figure 5.1.

The above paragraph is an attempt to clarify the situation.

The developing stand thins itself naturally, but not down to anything like the stocking rate of the old growth forest. At 40 years, a stocking rate of approximately 2,000 per hectare would be expected to persist, except where wildfire intervenes, as has happened over 20% of the logged area to date. Wildfire kills young regeneration to ground level. Multiple coppice stems develop from each root system, and an even aged stand of perhaps 40 to 80,000 stems per hectare results. In this environment, most ground cover and understorey species compete poorly.

Eucalypt species composition was not significantly affected by early logging and (fire free) regeneration on lowland sides (Bridges, 1983). Whether this will be true following slash-burning, and for other forest types, is not yet known.

Hazard-Reduction Burning

Any discussion of the effects of the current woodchip operation on vegetation should include the effects of the aggressive fuel-hazard reduction program on species composition and soils. The fire management policy (E.N.F.M.P. Appendix 26, May 11, 1982) calls for hazard-reduction burns at 3 to 5 year intervals in all regenerating stands as a first priority. Local experience has shown that regular burning results in the elimination of the shrub component in favour of grasses (E.N.F.M.P. 1982 p. 47). One study in Nadgee illustrates the complexity of the relationship between fire and species diversity. Fire allows pioneer species a chance to compete

but frequent firing causes the elimination of sensitive species, especially when fires of the same intensity are repeated in the same season (Good, 1984) (Figure 1.).

On some sites, the ubiquitous bracken fern is favoured by frequent burning. Plant species most at risk from frequent hazard reduction burning would be those killed by low intensity fires before they are old enough to set viable seed, or those dependent on a generous cover of litter and humus, such as saprophytic orchids. The Hyacinth orchid (*Dipodium punctatum*) is common in Silvertop Ash forests which are infrequently burnt but I have yet to see a single specimen in regrowth after logging and burning.

Impact on Wildlife

These changes in vegetation structure and composition inevitably lead to changes in fauna. Some small terrestrial mammals, for example, the Brown Antechinus, Bush Rat and House Mouse are favoured by dense, shrub layer vegetation (Recher et. al. 1980).

Arboreal Marsupials

Recher et. al. (1980) identified seven species of arboreal mammals most at risk due to intensive logging because of their dependence on mature forest. These include the Greater Glider, Yellow-Bellied Glider, Sugar Glider, Feather-Tail Glider, Koala, Pygmy Possum and Short-eared or Mountain Possum. They are at risk because they require dens or hollows for shelter. These dens may not develop in trees until they are over 100 years old. Arboreal mammals generally forage in mature trees, although some may use suitable understorey species at certain times. The richest habitat for these arboreal mammals has been substantially cleared for agriculture and pine plantations, so that the management of the small amount of suitable habitat remaining is critical for their conservation (Kavanagh, 1984).

Studies on the Greater Glider have shown that the only individuals which survived logging were those with retained unlogged forest in their original home ranges (Recher et. al. 1980). There is no indication of an increase in the numbers of Greater Gliders in remnant unlogged forest, suggesting that affected individuals will not invade the territories of others. Greater Gliders frequently choose mature *Eucalyptus obliqua* for their nest tree. Surprisingly, only *E. cypellocarpa* is singled out in logging policy as a preferred species for retention as habitat trees (E.N.F.M.P., 1982, Appendix 15). Young foliage is the Greater Glider's preferred diet. During winter, when there is little new growth, tree species with a high level of nitrogen in their mature foliage (for example *Eucalyptus radiata* and *E. ovata*) become very important. Winter time deaths reported by Kavanagh (1984) suggest that the population of Greater Gliders will suffer in proportion to the amount of habitat lost.

The Yellow-bellied Glider is less common than the Greater Glider and lives in discrete colonies. It is more mobile, ranging up to

1.5 km from the den tree and, with individual glides of 150 metres, it can traverse regenerating areas provided enough scattered tall trees remain. Kavanagh (1984) reported that the Yellow-bellied Glider shows marked seasonal shifts in habitat preference. Winter flowering of *E. ovata* provides an important source of nectar for the Yellow-bellied Glider in tableland forests, at a time when other food sources are in short supply relative to energy needs. Its habit of emitting a blood-curdling call during each glide makes it vulnerable to increase predation by the Powerful Owl and Feral Cat when mature forest cover is reduced.

Birds

Birds have greater mobility than most animals and might therefore be expected to be less at risk from woodchipping. However, Smith (1985) reported 20% fewer species of birds in 10 - 15 year old regeneration compared to mature forest on ridge sites in Silvertop Ash forest near Bega (Figure 2.). This was in spite of the fact that 5 mature trees per hectare were retained in regenerating stands compared to 61 per hectare in old growth forest. Hollows were not shown to be in limited supply for breeding because of these retained trees. Foraging habitat appeared to be the limiting factor. The species less abundant in regeneration were the Gang-gang Cockatoo, Orange-winged Sittella, Red-browed Treecreeper, White-eared Honeyeater, Brown-headed Honeyeater, Eastern Spinebill, Mistletoe Bird and Spotted Pardalote.

This study also gave an indication of the possible effects of frequent hazard-reduction burning. A low intensity fire in 1981 burnt 81% of the understorey on ridge sites but only 4% in gullies. This was followed by a statistically significant shift of 10 bird species to gully sites. Scrub wrens and Thornbills were still absent from ridge territories 1 year after the fire.

Recher, et.al. (1980) reported that logging regeneration of up to 10 year age supports fewer than half of the breeding bird species expected in mature forest on similar sites. Therefore, while the dense shrub layer habitat provided by young regrowth offers increased foraging opportunities for some species (see Smith 1985) there seems to be a reduced opportunity for breeding in early years.

The value of buffer strips in gullies for conservation is clearly illustrated by the increased bird and animal population densities in gullies. Smith (1985) found that of 22 species nesting in the study area, 18 were nesting in gully sites while only 9 chose ridge sites. Recher et. al. (1980) found that narrower buffer strips (20 metres each side of the drainage line) in logged areas of Bondi Forest had fewer bird species than similar sites in mature forest, whereas wider strips (40 metres each side) on Anteater Road supported the same number of species as unlogged areas. These authors suggested that buffer strips should be a minimum of 80 metres total width, otherwise 'edge' species such as the Magpie or Blue Wren tend to dominate.

Overall, fauna most likely to be affected adversely by intensive

logging are those which nest in hollows or in the mature canopy; those which forage on mature tree trunks or in the high canopy and those which depend on abundant eucalypt or understorey flowers for nectar. Recher et. al. identified seven arboreal marsupials (above) the Dunnart and several bats as potentially at risk from intensive integrated logging effects. Sensitive birds identified include the Glossy Black Cockatoo, Yellow-tailed Black Cockatoo, Gang-gang Cockatoo, Rainbow Lorikeet, Musk Lorikeet, Little Lorikeet, King Parrot, Crimson Rosella, Powerful Owl, Sooty Owl, Owlet-nightjar, Sacred Kingfisher and Red-browed Treecreeper. Other birds listed by Smith (above) should be added to this list.

Wildlife Management

These authors made a number of recommendations concerning buffer strips and retained mature "habitat" trees, some of which have been partially implemented. The following discrepancies between their recommendations (Recher et. al. 1980 pp 54-56) and the Commission's Wildlife Policy (E.N.F.M.P. 1982 Appendix 15) warrant attention.

- (1) Buffer strips should be a minimum of 40 metres each side of the drainage line. The management plan prescribes 20 metre filter strips are prescribed and 40 metres with a greater than 18° slope.
- (2) Logging should be excluded from any part of the buffer strip. Logging is currently permitted in filter strips provided machinery does not enter the area; the tree is marked for felling by a forester and no part of the tree falls into the watercourse. In practice, supervision of this prescription is poor. Marketing foremen are supposed to visit 3 crews per day but frequently have to visit 4 due to absences and other duties. They have to check log classification, cross drains etc., and their ability and inclination to walk right around the bottom of a coupe is limited. Because logging crews receive piece rates rather than wages and are under pressure to meet pulpwood quotas, the temptation to fell trees in gully sites, which often support the biggest and most profitable trees, is considerable.

Often retained trees fall over if a wet winter or high winds follow logging. Wildfire in young regrowth severely damages old trees around the edges of the logged area. Even post-logging burning has killed seed and habitat trees.

- (3) Buffer strips to prescription should be established in second rotation pine plantations. There is no evidence of this to date in pre-war plantations in Nalbaugh State Forest, or in the 6,000 or so hectares of pines burnt in 1983 in Bondi State Forest, now being replanted.
- (4) Logging coupes of particular importance to wildlife should be reserved from clearfelling and managed on a selective basis. High intensity integrated logging commenced in the

rich mixed peppermint/gum/fastigata forest of the Coolangubra in spite of a proposal for the establishment of a flora reserve for arboreal mammal conservation and scientific reference put forward by the Forestry Commission's own wildlife ecologist, Wyn Rohan-Jones (undated). High intensity integrated logging has also commenced along the Chalkhills Road in Yurramie State Forest. One of only three reported sightings of Koalas in recent years in the south-east forests was in the area between Chalkhills Road and Kingfisher Road. This area of magnificent forest contains a diversity of suitable eucalypt species (principally *E. cypellocarpa*, *E. maidenii*, *E. fastigata*, *E. Elata*, *E. globoidea*) which could no doubt support a viable Koala colony. The Nadgee habitat has been destroyed by logging and repeated wildfire. It is therefore extremely important that the Tanja and Yurramie sites be preserved.

- (5) Thinning of regrowth and increased utilization of butts and limbs should be developed to maintain production of pulpwood while implementing the above recommendations. In one thinning trial off Hut Road, East Boyd State Forest, poles culled from 1952 fire regeneration have simply been left to rot in the bush. Presumably it was not economic to debark such small stems. The present low level of utilization of butts and limbs is appalling. Pulpwood yield averages 88 tonnes per hectare. After logging, there are an average 230 tonnes per hectare of "coarse fuels" left behind. While a proportion of this would have been on the ground before logging commenced (estimated at 75 tonnes/ha, E.N.F.M.P. 1982, p.46), standing dead timber and very small limbwood, utilization could probably be increased by 50% with little extra effort. This is unlikely to happen while the Forestry Commission does not levy a sufficient royalty on large pulp logs to make utilization of smaller wood economically attractive.
- (6) Large national parks west of the Princes Highway will be needed if intensive logging proceeds in East Gippsland on an expanded scale and wildlife management procedures are not adequately implemented. The Victorian Timber Industry Inquiry chaired by Professor Ian Ferguson recommended recovery of pulpwood in East Gippsland. The existing management practice is to clearfell and regenerate by burning and seeding. Haris-Daishowa Australia have requested access to 500,000 tonnes of pulpwood per annum from East Gippsland (Letter to Land Conservation Council of Victoria from Mr. Shimmyo, H.D.A. 5.11.85) and have installed the capacity to chip and ship 1.275 million tonnes per annum at the Eden mill. However, the woodchip industry has consistently resisted any increases in reserves in the area and implementation of the wildlife management recommendations has been far from comprehensive.

Ecological Risk

While the primary objective of wildlife management in forests is to ensure that no species becomes extinct or reduced in range, there is also an economic value in conserving strategic populations of many species (Loyn, 1985).

Even-aged 100 hectare coupes of one or two dominant species present an attractive opportunity to pests such as various sap sucking insects, defoliating weavils and caterpillars, wood boring beetles, cossid moth larvae, termites etc. Many insects are kept in check by the small insectivorous birds which nest in the shrub layer, within 1 or 2 metres of the ground (e.g. Weebills, Thornbills, various Honeyeaters) or in hollows in old trees. Frequent hazard reduction burning, especially if it involves escapes into filter strips, can reduce the breeding habitat for the small insectivorous birds which keep the high canopy free of excessive insect damage. Yellow-tailed black cockatoos cull trees infested by wood boring beetle larvae by hacking into their trunks. Bats may keep moth populations in check. Even the Australian Bass consumes vast numbers of moths at dusk in summer.

The forest ecosystem is complex and may not be sufficiently resilient to withstand the combined assaults of highly intensive logging and frequent hazard reduction burning in the longer term.

Water

High intensity logging has the potential to seriously affect water catchment values (Footnote 1) and the adoption of alternate coupe logging, prescriptions on road and snig track design and drainage, filter strips etc. in the 1970's was largely in response to this risk. However, there is no conclusive evidence to suggest that these "modifications" have reduced, to within acceptable levels, the impact of intensive logging on streamflow variations, soil erosion and siltation or water quality to within acceptable levels.

Wallagraugh Catchment Studies

Storm hydrographs from experimental catchments in Yambulla State Forest showed that, while a burnt but unlogged catchment had completely recovered 28 months after wildfire, a catchment with 42% of its area logged before the fire still exhibited peak stormflow of 3 to 4 times that expected if logging had not taken place. (Mackay and Cornish, 1982) (Figure 3.). The authors attributed the persisting higher peak flows to decreased surface infiltration capacity due to logging effects and a lower level of transpiration recovery in clearfelled areas. However, the 168 mm storm event (May, 1981) which produced these hydrographs followed prolonged dry conditions. Baseflows prior to the storm appear to be zero in all catchments studied. Under these conditions, it would seem unlikely that differences in transpiration, which can only affect stormflows through differences in antecedent soil moisture depletion, could explain the difference between logged and unlogged catchments.

Therefore it is likely that the deleterious impact of heavy logging machinery on granite-derived catchments will persist for more than three years. Unfortunately, the Forestry Commission has not published any streamflow data for these logged catchments since this paper appeared in 1982.

Increased stormflows due to reduced infiltration into bare and compacted catchment surface can have a number of serious consequences. The frequency of significant floods might increase if more than a small proportion of a drainage basin is logged within a few years. It has been suggested that the peak flows during extreme floods, such as January 1971, would not be significantly higher, because even an undisturbed catchment is totally saturated and producing 100% run off during such storms. However, an increase in the frequency of lesser floods can significantly affect the viability of agriculture on river flats, the most productive land in the Bega Valley Shire. Higher stormflows also cause erosion on streambanks, leading to siltation downstream and further increases in subsequent flood peaks.

If a high proportion of storm rainfall runs off as quickflow, it is obviously not available for slow release into streams to maintain flow during dry periods, when it is most useful. In this context, it is worth noting that none of the catchments subject to woodchipping have on-stream storages (with the exception of 5% of the Brogo Dam catchment). All irrigation and diversions to urban water supply schemes in the southern half of the Bega Valley Shire depend on the maintenance of streamflows in dry periods. Such flows are also critically dependent on transpiration within the catchments.

M.M.B.W. Studies

Studies on regenerating Mountain Ash (*E. regnans*) forest by the Melbourne Metropolitan Board of Works have shown that a 42% reduction in water yield could be expected due to clearfell logging on a 70 year rotation, attributable to higher transpiration by dense, young regeneration (Kuczera, 1985) (Figure 4.). There are differences between the M.M.B.W. catchments and those in the Eden region which need to be considered:

- a. Storage capacity within the deep soils of the MMBW catchments is likely to be higher than for most of the Eden region. For example, while rainfall peaks around August/September, streamflow does not reach maximum level until November/December. On the face of it, this might suggest that there is less potential for transpiration effects to reduce total water yield in the Eden region. However, total water yield is irrelevant unless there are significant on-stream storages. Persistent baseflow in dry weather is what counts for riparian irrigation. For urban use on the 'Tantawangalo scheme' flows at least equal to the diverting pipeline capacity need to be maintained most of the time for the most economical system design, taking into account the considerable distance from source to end use and the cost of pipeline and terminal

storage construction. Therefore, transpiration effects could be more significant in the Eden region because, with thinner soils, they would be more immediate and therefore more likely to affect summer-time flows, when water consumption by irrigators and the tourist towns is greatest.

- b. The Eden region is approximately 5°C warmer than the MMBW catchments. Transpiration effects are very sensitive to temperature. For example, O'Loughlin et. al. (1982) could only demonstrate the effects of a defoliating fire on streamflow by analysing summer and winter flows separately.

Detailed studies of the Mountain Ash wildfire regeneration showed that soil moisture depletion rates are related to parameters of stand density weight stocking rate more heavily than total basal area (Moran and Ronan, 1978 Footnote 2). Given that stocking rate increases from around 100 to more than 6,000 stems per hectare following integrated logging, significant transpiration effects can be expected. A great deal of this increased water use by the regrowth is not contributing to useful wood production. Kirkpatrick and Bowman (1982) point out that much of the growth increment in early years is in stems which will die out before reaching a useful size.

For the above reasons, it is important that recent streamflow data from the Forestry Commission's Yambulla studies be published before any decision is made to continue woodchipping. These studies were interrupted by wildfire in January 1979. However, wildfire effects are unlikely to persist once regeneration is established, except through the effect on stocking rate and a relatively minor effect of some accelerated soil erosion on catchment storage. Therefore, recent baseflow data, interpreted to take into account relative stocking rates in logged areas regenerated naturally, by slash burning or coppicing after wildfire, should give some useful information about the effect of high intensity logging on the persistence of baseflow in dry weather.

Soil Erosion

Soil erosion following intensive logging has been studied in the Yambulla catchments by measuring net export of suspended sediment and solute at the stream-gauging weirs. Reiger et. al. (1979) reported that increased sediment and solute loads of 150% and 100% respectively due to small alternate coupe logging appeared to be shortlived. In retrospect, these studies appear to be an academic exercise which has little relevance in assessing the erosion and sedimentation due to the current intensive logging operations because:

1. Stream sampling equipment was incapable of measuring bedloads. Coarse grained material which is transported along the stream-bed in stormflows is probably the most significant class of material eroded from granite-derived catchments. Such coarse material was transported across the weir wall in heavy storms in 1978 (Burgess, 1984) but not sampled.

2. Granite-derived soils produce very little suspended sediment. Reiger et. al. (1979) stated that suspended loads from the undisturbed catchments were in the lower end of the range reported for other Australian studies on forested catchments. Had these studies been carried out on the highly dispersive shale-derived soils, such as those in the Jingera Section, the results may have been more meaningful.
3. Using erosion pin estimates, Mackay et. al. (1984) showed that significant erosion had occurred within the catchments which, if continued, could lead to significant site deterioration. (Figure 5).
4. Massive siltation occurs at stream crossings on major roads because of excessively steep approaches, poor drainage design and unprotected batters.
5. Increased stormflows erode stream banks, adding to siltation.
6. The introduction of post-logging burning substantially mimics the disastrous additional impact of wildfire reported in the Yambulla studies (Burgess et. al. 1981).
7. Coupe sizes have increased from less than 15 ha to around 100 ha. (E.N.F.M.P. 1982 Appendix 26, 3.2).
8. Inadequate adherence to erosion mitigation prescriptions due to the piece-rate payment system (see above) has exacerbated these effects.

Overall, the main effects of this soil erosion are likely to be site deterioration in the forest, further reduction in dry-time streamflows and siltation of streams. Siltation could threaten the regional conservation of the platypus and native fish like the Australian Bass and Australian Grayling. Tourist opportunities will be sterilized as natural streams become boring, silt-choked drains.

The quality of water from logged and burnt catchments is affected by increases in turbidity and solute load. In the Tantawanglo catchment, these risks are being assessed by Forestry Commission studies. Perhaps the most serious risk of poor water quality is faced by direct riparian users, where the putrefaction of lower dry-time flows is probably more relevant than turbidity in stormflows.

Increased turbidity may affect the viability of the oyster industry. "Winter mortality" affected about 50% of oyster stocks during 1984, when streamflows remained high for months. The cause of winter mortality is not known but it could simply be starvation due to lower growth rates of phytoplankton in turbid water.

Fire Risk

Wildfire has enormous potential for environmental and economic

damage in the Eden region. Supporters of woodchipping have repeatedly claimed that the industry facilitates improved fire protection through roading and suppression resources. However, these claims need to be reassessed, in the light of serious losses of young regeneration to fire in only the first half of the first cutting cycle.

The South-East forests have the highest frequency of severe wildfires in Australia (Cheney, 1976). Factors contributing to this hazard are erratic rainfall; the 'rain shadow' effect of the Snowy Mountains, which intercept moisture carried by winds from any westerly quarter; fibrous-barked eucalypt species, prone to throwing spot-fires; and a tendency for strong north-westerly winds in October (B.V.S.C., 1985).

Fuel levels in the old growth forest are generally not particularly high, due to relatively high litter decomposition rates. Equilibrium fine fuel weights average around 10 tonnes per hectare and range from 18 tonnes per hectare in gullies to 8 tonnes per hectare on ridges (E.N.F.M.P., 1982, p.46). When the canopy is removed, fine fuel accumulates rapidly, with the unsuppressed growth of grasses, shrubs and eucalypt seedlings.

Logging slash has been estimated to comprise about 10 tonnes/ha fine fuels, 230 tonnes/ha coarse fuels and considerable quantities of bark. This is now burnt in the autumn or winter following logging. While the burning reduces this hazard in the short-term, it may stimulate germination, especially of shrub components, so that total fine fuel loads could be higher after 2 or 3 years and the vertical continuity of fine fuels between litter and canopy extended for many years (Bridges, 1983).

While the moisture content of live fuels makes them less flammable under mild conditions, this has not prevented all foliage in young regrowth from burning fiercely in the wildfires of 1979 and 1980 (MacKay and Cornish, 1982, Bridges, 1983).

The arrangement of fine fuels in young regrowth is such that its surface area exposed to air is far greater than that of the somewhat compressed litter on the forest floor. Wind speeds acting on young regrowth are also higher than wind speeds acting on litter under an intact oldgrowth canopy.

The spread of fires by spotting may be thought by some to be less likely in young regrowth which has less well developed fibrous bark. However, around the perimeter of regenerating coupes, and with some retained and dead trees within the coupes, there are plenty of sources of fibrous bark which would be subject to a fierce conflagration and updraft. Examples of this edge effect can be seen along Broadaxe Road.

The frequency of some wildfire ignitions may be increased by wood-chipping. Ignitions due to campfires, cigarette butts and arson, are facilitated by increased road access. Logging machinery ignitions and escapes from hazard-reduction burning may also in-

crease. Lightning strikes may be more easily dealt with by rapid initial attack, although this will depend on fuel loads and the flammability of the area. (Figure 6).

Road access has some advantages for the quick suppression of fires in mild conditions for backburning or for blacking-out burnt areas before severe fire weather returns. Suppression of a running fire under extreme conditions is simply not possible by conventional means, as was demonstrated by the Timbillica fire of November 1980 and the Bondi fire of February 1983. In general, any advantages offered by improved road access for suppression of lightning strikes seem to be outweighed by the disadvantages of increased ignitions due to human activity (see E.I.S. on Tasmanian Woodchip Exports Beyond 1988 p. 379 or M.M.B.W. submission to Victorian Timber Industry Inquiry, Feb. 12 1985, Section 2, O'Shaughnessy, 1985).

The oldgrowth forests of the south coast are well adapted to surviving fire. Recovery via epicormic shoots on all but the most exposed sites allows the canopy to return within weeks. Wildfires stimulate the germination of seedlings (fine fuel) but recovery of the canopy causes their early suppression.

In contrast, fires in logging regeneration kill the young trees to ground level. From each root system, up to 8 coppice stems redevelop. Such stands are not only a worse fire hazard but are so badly overstocked that they will not put on much useful growth for many years.

The upper trunk of older regeneration can be killed by wildfire, while the lower portion recovers to produce a number of competing branches around the dead bole spike. These trees are virtually useless from a timber production point of view. (Bridges, 1983).

The 1982 Fire Management Policy (E.N.F.M.P. Appendix 26) prescribes a severe regime of hazard reduction burning before and after logging, in all regenerating stands at 3 to 5 year intervals and in oldgrowth forest. It is not yet known at what age regenerating stands can be safely burnt. One report predicted that large scale hazard reduction burning would be possible after age 15 years (A. Long, 1984), but a large area of 16 and 17 year old regeneration on poor coastal sites has not yet been coolburnt. Around Easter 1986, serious crown scorch was caused by overzealous hazard-reduction burning in the 1952 fire regeneration in East Boyd State Forest. There was also widespread crown scorch caused by reckless aerial burning of oldgrowth forest in the Faulkner Section shortly after Easter. The fuel moisture and meteorological criteria on which the Forestry Commission base their decisions to light up, need to be reviewed.

Repeated burning is the cause of significant losses of nutrients from forest soils (Raison et. al., reviewed by Considine 1984). Given high enough royalties, these might be replaced with artificial fertilizers. The loss of organic matter may have more serious consequences. Repeated burning reduces the breeding habitat for small birds and may cause the elimination of some understorey species (see above). Moreover, hazard-reduction burning cannot

reduce fuel levels in young logging regeneration, which probably represents the greatest fire hazard.

Conclusions

Flora

Diverse and interesting mature forest, with trees of a variety of age classes and some beautiful contorted shapes, is replaced by a boring, dense stand of skinny poles.

Intensive logging and an aggressive fuel hazard reduction burning program may eliminate many shrub layer species and saprophytic orchids from the forests of the Eden region.

Fauna

Marsupials, bats and birds which depend on mature forest habitats are threatened by inadequate wildlife conservation policies, in particular :

- * Filter strips along streams are too narrow
- * They are not adequately protected from the effects of logging and fire, both within and outside their boundaries
- * Not enough mature trees are retained within logging coupes for some species
- * Retained trees are often affected by a rise in the water table and higher wind exposure after logging and burning
- * Areas of special importance to wildlife conservation have not been reserved
- * The full range of wildlife habitats in the region is not adequately represented in existing national parks.

Water

The climate of the Eden region is characterised by bad droughts and occasional heavy storms.

Intensive logging increases stormflow peaks.

Intensive logging decreases the persistence of streamflow in droughts by 3 mechanisms :

- * Reduced infiltration of rainfall into bare and compacted catchment surface
- * Increased water use by grossly overstocked regeneration
- * Reduced storage of water within the disturbed and eroded soil profile.

Water quality is downgraded by :

- * increased turbidity due to logging disturbance;
- * increased nutrient leaching due to logging disturbance and burning; and
- * putrefaction of lower dry-time streamflows.

Soil Erosion

Forestry Commission studies have seriously underestimated the soil erosion due to intensive logging.

Massive soil erosion has lead to a loss in site productivity and siltation of streams, destroying the habitat for endangered fish like the Australian Bass and Australian Grayling.

Fire Risk

- * The Eden region has a high frequency of severe fire weather.
- * Young regeneration has fine fuel levels several times those in mature forest.
- * The fine fuels in regeneration are far more effectively aerated than the litter under an intact oldgrowth canopy.
- * More wildfire ignitions will result from the increased road access and ambitious fuel hazard reduction burning policy.
- * The effect of wildfire on young regeneration is to cause the redevelopment of an even worse fire hazard.
- * Fuel hazard reduction burning is not possible until the regeneration is at least 15 to 20 years old.
- * The record to date contradicts the claims by woodchippers that improved access and supression resources will reduce wildfire damage.

Footnote One

How Catchments Work

Forest catchments convert rainfall to streamflow by two different mechanisms. If the soil surface is bare and impermeable to water, or if rainfall is extremely intense, most rain will run-off by direct overland flow. Much more commonly, rain filters into the soil and moves very slowly towards the drainage lines through the soil profile.

In between rainfall events, streamflow (in this case known as

baseflow) is maintained by interflow, that is, the lateral movement of water through the soil profile towards streams. When rain of moderate intensity falls, interflow increases and areas of the catchment near streams become totally saturated with water. These are known as "variable source areas" and their size usually determines the proportion of total rainfall in any given rainfall event which will run off as stormflow (or "quickflow"). The size of these source areas is, in turn, determined by antecedent rainfall and antecedent transpiration (water consumption by the forest).

Therefore, the persistence of baseflow between rainfall events is determined by the surface infiltration of previous rainfall, the storage capacity of the soil and the amount of water use (transpiration) by the forest.

Logging can affect catchments in three main ways. Firstly, heavy logging machinery compacts the soil, decreasing the infiltration capacity of areas such as log dumps and snig tracks. Secondly, the removal of live trees reduces the transpiration rate and both stormflows and baseflows will initially increase. However, as dense young regeneration becomes established, transpiration recovers and can even exceed pre-logging transpiration rates if the number of trees per hectare is higher. Thirdly, soil erosion downslope means that storage of water within the catchment is closer to the drainage lines. Over time, this can affect the persistence of baseflow in dry weather.

Footnote Two

Moran and Ronan (1978) measured the rate at which the water table fell in a series of boreholes distributed throughout a stand of 1939 fire regeneration at Black Spur, Victoria, during a dry summer. They related the soil moisture depletion rate to various parameters of forest stand density, such as the size of nearby trees (measured as basal area, B.A.) and their proximity to the borehole (Distance R.). They found that larger trees used more water than small, and that close trees took more water than distant ones. They tried various weightings of these parameters to see which gave the best correlation with soil moisture depletion rate.

The sum of $B.A./R^3$ values for trees in a 15 metre radius around a borehole was more significantly correlated than $B.A./R^2$ or $B.A./R$ values, emphasising the importance of proximity to the borehole. Power functions of B.A. were not shown to improve the correlation. Therefore, a high number of trees per hectare is probably the most significant factor determining water use by a forest.

(Species names of Bass in HDEIS Appendix 10E) Macquaria novemaculeata

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NATURE CONSERVATION COUNCIL OF NSW

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SUBMISSION BY THE
NATURE CONSERVATION COUNCIL OF NEW SOUTH WALES ON THE
SUPPLEMENTARY DOCUMENT TO
HARRIS-DAISHOWA (AUSTRALIA) PTY LTD'S
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE EDEN (N.S.W.) WOODCHIP EXPORT OPERATION
FOR THE PERIOD 1989-2009,
PREPARED BY
FORESTRY COMMISSION OF NEW SOUTH WALES

7th November, 1986

1. Introduction

The following comments should be read in conjunction with the Nature Conservation Council of New South Wales' Submission on the preceding Draft Environmental Impact Statement prepared by Harris-Daishowa (Australia) Ltd. (HDA).

Many of Council's comments on the Forestry Commission's Supplementary Document are already covered in the publication "Forests and Jobs in Eden", by Keith Tarlo, published by the Total Environment Centre, Sydney, October 1986. Ideally this document should be read in conjunction with the present submission. As detailed (pages 8-9) in our previous submission on the Draft E.I.S., under Forestry Commission management the Eden forests have been subject to overcutting of the sawlog resource beyond sustainable levels, in tandem with pulpwood extraction. This problem of overcutting, along with maintenance of employment is addressed in Keith Tarlo's paper. Figures presented in the Forestry Commission's Supplementary Document, for example on page 19, showing a progressive reduction in the sawlog quota, confirm past and current overcutting.

We wish firstly to reiterate some of the main points made in the paper by Keith Tarlo.

2. Pulpwood Yields in the long term

We maintain that contrary to the view of HDA and the NSW Forestry Commission (F.C.) pulpwood yields from ENFMA (Eden Native Forest Management Area) cannot be sustained at 530,000 tonnes p.a. beyond the proposed 20 year cycle ie. 2010. The "Model" produced on p.124 of the F.C. Supplementary Document shows that required yields cannot be achieved in the medium term because thinning by its very nature will only remove part, not all of the regrowth.

Council contends that the Forestry Commission has failed to demonstrate the sustainability or viability of its proposed thinning operations. The Forestry Commission's claims on pages 33 and 34 of the Supplementary Document are unproven, as thinnings trials have not yet yielded sufficient data (HDA's EIS, pages 5.10 and 8.64).

Council refers the Department to the detailed critique of the Forestry Commission's thinnings claims contained on pages 14-15 of Keith Tarlo's paper.

3. Sawlog yields in the long term

Although quotas are to be reduced to 60,000 m³ per annum by 1988 to ensure that the mature forests last until the year 2010, the Forestry Commission merely states that there may be a need for further reduction of old growth yield at the end of this harvesting (page 33).

There is no quantification provided to support the Forestry Commission's claims on page 33 regarding sources of sawlogs after 2009. No figures giving estimates of resource from:

- . trees retained as sawlogs in the first cutting cycle
- . advanced regrowth from past fires
- . past sawlog harvesting in the Bega district, pre-1970

are provided. Considering the length of time for a sawlog tree to grow, 80-150 years, it is difficult indeed to see where sawlogs after 2009 will come from.

This is a major flaw in the woodchip proposal which is being glossed over by both HDA and the Forestry Commission. Council refers the Department to Section 3.2.3., page 16, of Keith Tarlo's paper.

These points 2 and 3 reinforce Sections 5.2 and 5.3 of our submission on the Draft E.I.S.

4. Effect of declaration of the proposed Coolangubra and Tantawangalo National Parks

The Forestry Commission claims (pages 43,44,129,130) that exclusion from harvesting of the Coolangubra and Tantawangalo areas listed on the Interim Register of the National Estate would have "enormous" and "disastrous" consequences for both the sawmill and pulpwood sectors. The claim is made on page 130 that the loss of the sawlog resource would mean the closure of two mills, and possibly three. However, in Table 9, page 43, the combined sawlog resource is estimated to represent only nine years' supply to the relevant mills. Despite this, on page 44 it is claimed that these two areas represent the major source of supply for the three mills (Bega, Nimmitabel, Bombala) between 1990 and 2010, that is, over a twenty-year period.

The Forestry Commission also claims that the Coolangubra and Tantawangalo National Estate areas represent significant contribution to the pulpwood resource, making them crucial parts of the woodchip operation. The Nature Conservation Council disputes this claim, which is in fact diminished by the Forestry Commission's own admissions on pages 45 and 129 that much of the Coolangubra and Tantawangalo areas could be economically viable for sawlogs alone.

This Council contends that the effect of the Forestry Commission's claim, that integrated logging of the Coolangubra and Tantawangalo nominated areas is a crucial part of the HDA woodchip operation, is to obscure the cause of the impending sawlog shortfall, namely, past and current overcutting beyond the sustainable level. Council refers the Department to Section 4.1 of Keith Tarlo's paper, page 21, which lists reasons for past and present trends in job losses. Tarlo's analysis on pages 19 and 20 shows that declaration of proposed Coolangubra and Tantawangalo National Parks, far from having "enormous social and economic impacts" (as claimed on page 44 of the Forestry Commission's Supplementary Document) would reduce the timber harvest by only 8% over the effect of implementing measures to ensure sustainability, and result in loss of only 16 jobs, directly attributable to the National Parks.

5. Area to be affected by pulpwood extraction operations

Section 5.1, pages 7-8, of our previous submission listed four different estimates for the area of forest to be subjected to integrated logging for pulpwood extraction, namely 182,000ha, 218,000ha, 227,300ha, and 231,900ha, which appear in different places in the ENFMP 82 and the E.I.S. The Forestry Commission's Supplementary Document gives a fifth figure, 201,935ha, in Table 1, page 12, (174,295 + 27,640).

It is impossible to assess the environmental impact of the proposal accurately when there are five different estimates of the amount of land to be affected!

6. Alternatives to the HDA/Forestry Commission Proposal

Council would like to commend the intention expressed in Section 5(ii) of the F.C.'s Supplementary Document regarding increased utilisation of material currently wasted; Council would see this as a desirable aim in the context of Approach 3 recommended below.

Regarding plantations, Council deplores the negative attitude towards establishment of hardwood plantations expressed by the Forestry Commission. Of course plantations are a long-term prospect; Council recommends that steps be taken now to establish hardwood plantations in the Eden region on already-cleared land. The costs of land purchase decried as too expensive should be compared with the expenditure by the Forestry Commission on infrastructure accompanying the existing HDA woodchip proposal. Council refers the Department to comments made in our previous submission under Section 9.1, page 13.

Finally but most importantly, Council refers the Department to the alternatives discussed in detail in Section 6 of Keith Tarlo's paper, and strongly recommends the adoption of Approach 3, Section 6.3, pages 35-38, for reasons of sustainability, employment prospects and environmental protection.

7. Places of National Estate Significance

This Council deplores the Forestry Commission's attempt to discredit the nominations of the Coolangubra Forest Area and the Tantawangalo Creek Catchment to the Register of the National Estate. These nominations were assessed by a multidisciplinary expert panel before proceeding, and have been accepted onto the Interim Register. In seeking to discredit statements made in support of the nominations, the Forestry Commission makes unsubstantiated and undocumented claims. For example, on page 85, item 9, re Tantawangalo Creek Catchment, in seeking to discredit the statement that "there is a diverse and dense bat population", the Forestry Commission claims:

"Speculation based on ten trap-nights. No scientific credibility. It is established only that eight species occur in the area".

"Forestry Commission recognises lack of any scientifically credible information on bats generally in the region. This will be covered in future research programmes."

In other words, while admitting it has done no research itself, the Forestry Commission attempts to discredit research which has been done!

We understand also that, while criticising the basis of these National Estate nominations, the Forestry Commission has taken from them a number of the rare plant species and incorporated them into its own list without acknowledgement.

8. Research

The Forestry Commission's attitude to flora and fauna research as presented in this Supplementary Document does not encourage confidence in the Commission's ability to manage the region's state forests for flora and fauna conservation. For example, on page 135, under Section 9(ii), Research, the following claim is made:

"The research effort at Eden is amongst the best in Australia, and the adequacy or otherwise of existing information must be judged in this context."

No evidence is provided to support this claim - the basis of the comparison is not described, nor the criteria on which the judgement is made. In the subsequent cataloguing of the Commission's research programme, a large proportion of the research items are not actually proceeding.

9. Impact on Wildlife, and Adequacy of the Region's Existing Conservation Reserves

The comments on these two topics on pages 3-6 of our Submission on HDA's Draft E.I.S. remain relevant after examination of the Supplementary Document. For example, the importance of filter strips of adequate size for wildlife needs was discussed in Section 3.2 of our previous submission. As the size of filter strips has not been specified on page 13 of the F.C. Supplementary Document, we presume they are as specified in the ENFMP '82 (Eden Native Forest Management Plan, 1982), and our comments in our previous submission about their inadequacy still apply. We refer the Department to Section 3 and 4 of our previous submission.

10. Conclusion

After examination of the Forestry Commission of New South Wales' Supplementary Document, this Council finds that deficiencies in information relating to the proposal still exist in the areas of:

- . future pulpwood and sawlog resources, and their allocation
- . pulpwood yield estimates from logging regrowth thinnings
- . forest management necessary for wildlife conservation
- . details on commitment to undertake environmental research, particularly in the area of flora and fauna, and to make results publicly available.

Council finds the Forestry Commission's attitude to certain National Estate nominations and Wilderness, as expressed in this document, most disappointing for a government authority.

Council recommends most strongly against approval of an export licence for the Harris-Daishowa (Australia) Pty Ltd woodchip project as proposed, because:

- . the project has not been demonstrated to be sustainable;
- . long-term survival of the region's native flora and fauna cannot be assured given the existing complement of conservation reserves and the forestry operations proposed.

Council recommends the adoption of Approach 3 described in the paper by Keith Tarlo entitled "Forests and Jobs in Eden", October 1986, for reasons of sustainability, employment prospects and environmental protection.

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30 July, 1986

The Hon. J.R. Hallam, M.P.,
Minister for Lands,
Ministerial Office,
11th Floor,
McKell Building,
Rawson Place
HAYMARKET NSW 2000

Dear Mr Hallam,

re: Eden Woodchip Issue

Thank you very much for providing the opportunity for discussions on the Eden woodchip project at the meeting on Monday 21st July with members of the Nature Conservation Council of N.S.W. and the Total Environment Centre, representing the South East Forest Alliance.

We would like to outline in a little more detail the nature of our concern about the conflict between current state forest management in the Eden area and conservation of forest ecosystems, with their constituent flora and fauna.

Our overriding concern in relation to the Eden woodchip operation proposed by Harris-Daishowa is that native forest ecosystems will be destroyed, without adequate representation in biologically viable conservation reserves, as part of an unsustainable timber extraction operation.

As mentioned in the video shown during the meeting Recher, Rohan-Jones and Smith (in their paper, Effects of the Eden Woodchip Industry on Terrestrial Vertebrates with Recommendations for Management, published by the Forestry Commission of NSW in 1980) concluded that "the existing National Parks and Nature Reserves in the Eden district are inadequate by themselves to ensure the survival of the region's wildlife." We agreed during the meeting with you that some forest management procedures had improved since the Eden woodchip operation began in 1969. However, these improvements are not sufficient to ensure conservation of the region's wildlife. There are inherent conflicts between integrated logging operations and flora and fauna conservation.

Firstly, although integrated logging is conducted on an "alternate coupe" basis, it is not possible or usual for most wildlife living in a logged coupe to find alternative homes in a neighbouring unlogged coupe because this area is already occupied. Secondly, food resources for wildlife are severely depleted when the bulk of the forest canopy is removed by integrated logging procedures. Thirdly, integrated logging practice does not ensure the preservation of the diversity of eucalypt and understorey species necessary to provide a year-round food resource for wildlife. Fourthly, although some habitat trees may be left in logged coupes, their survival is not guaranteed as they are subject to windthrow and damage once their surrounding forest cover is removed.

During our meeting you used the analogy of forests as "tree farms". The Nature Conservation Council of N.S.W. rejects the notion that forests are merely "tree farms". Properly managed forests are a living resource which can sustain ecosystems and species as well as being used for the benefit of humans - so long as all forest life and natural values are considered. The N.C.C. does not accept that the major emphasis should be on wood production; it believes that N.S.W. forests have a multiplicity of uses and should be managed for:

- 1) conservation of ecosystems and species
- 2) protection of water quality and soil
- 3) wood for human use
- 4) recreation/tourism

This belief is in accordance with widely-held views on the nature and role of forests, including elements of the World Conservation Strategy, the National Conservation Strategy for Australia, and the N.S.W. Forestry Commission's Indigenous Forest Policy, 1976.

The state's native forests should at all times be managed so as to ensure conservation of ecosystems and species. As discussed during our meeting, the Harris-Daishowa operation proposes the first cutting cycle of the entire old growth forest to be completed within forty years, by 2010. Therefore the nature and extent of unlogged areas of old growth forest are of crucial importance to wildlife survival.

Recher, Rohan-Jones and Smith, after specific research into the effects of the Eden woodchip industry on forest birds and mammals, recommended in 1980 a number of management prescriptions necessary to help achieve the objective of species conservation. These recommendations have not all been followed in Forestry Commission management prescriptions. For example, Recher et al's recommendations for buffer strips included the following:

- . forty metres to either side of a watercourse should be the minimum width for buffer strips;
- . logging should be excluded from any part of the buffer strip;
- . buffer strips should be extended to the top of some drainage lines within each compartment.

Rather than support these management prescriptions in total, the Forestry Commission's Erosion Mitigation prescriptions in the Eden Native Forest Management Plan (1982), and in its October 1985 updating, specify that a filter strip shall be a minimum of 20 metres each side of a watercourse for slopes under 18°, increasing to 40 metres only where the fall into the watercourse is over 18°. Logs may be felled within the filter strip provided no part of the tree falls into the watercourse. Also, filter strips may be burnt as a result of post harvest burning operations.

Thus, it is misleading to regard filter strips as unlogged wildlife refuge areas. In fact, current prescriptions for filter strips appear to be weaker than those in force ten years ago, when no trees could be felled, nor logging machinery come within 40 metres of any stream with a catchment area greater than about 50 hectares. In addition, filter strips do not conserve habitats away from watercourses.

Preferred Management Priority Classification areas, which include areas set aside for wildlife, are cited in Harris-Daishowa's E.I.S. as contributing approximately 33,000 ha to areas excluded from harvesting, and described as "relatively undisturbed" or "substantially unaffected by logging". In fact, logging to modified prescriptions and/or hazard reduction burning is permitted in many PMPC categories.

Council reiterates its concern that the sustainability of the Harris-Daishowa existing and proposed woodchip operation has not been demonstrated in the E.I.S. or the Eden Native Forest Management Plan, 1982. This matter is pursued in Section 5 of N.C.C.'s submission on the E.I.S. A copy is attached for your perusal.

Suffice it to say, without further extending this letter, that it is of utmost concern to the Nature Conservation Council that the Harris-Daishowa woodchip proposal, while not being demonstrably sustainable, has severe implications both for the continuation of the sawmilling industry and the conservation of the south east region's wildlife.

We seek your assurance that, in your capacity as Minister for Lands, you will take action to ensure that the terms of reference for the forthcoming Inquiry into the Eden woodchipping industry will encompass all the issues raised in this letter.

Yours sincerely

Roger Lembit

Roger Lembit
VICE-CHAIRMAN

Encl.

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15th July, 1986

MEMBER SOCIETY CIRCULAR

Dear Member Society,

SOUTH EAST WOODCHIPPING E.I.S. ON DISPLAY

We are writing to ask you for URGENT ACTION on the Eden woodchip E.I.S., which is at present on display and available for public comment until 31st July, 1986.

This E.I.S. proposes an increase in current export quotas up till 1989, and the renewal of woodchip export licences from south east N.S.W. for 1989 to 2009. Native forest areas proposed for woodchipping operations (pulpwood extraction) amount to nearly 200,000 hectares over a period of twenty years, and thus represents a major land use decision, which should be commented on by conservationists as a matter of high priority.

Although the E.I.S. has taken 18 months to prepare, the document has been made available for public review for only two months. The N.C.C. and other groups have urged Mr. Barry Cohen, the Federal Minister for Arts, Heritage and environment (under whose jurisdiction the E.I.S. comes) to extend the public review period to at least three months, but so far Mr Cohen has refused to do this.

So perhaps the first thing to do should be to send URGENTLY a letter or telegram to Mr Cohen asking for an extension of at least one month for the E.I.S public review period. If enough people and groups do this, Mr Cohen should be forced to respond. Point out that the proponents have taken 18 months to prepare the E.I.S., the period under consideration is 20 years, and timber from approximately 200,000 hectares of native forest land would be cut. This is the first opportunity for almost ten years for public review of Eden woodchipping operations, and a proposal of such magnitude needs more than two months to assess adequately.

However, as there is no guarantee that an extension of review time will be granted, we urge member societies and individuals to make submissions on the E.I.S. before 31st July. I apologise for the short notice, and in order to help you prepare a submission I will now list some background information and suggested points for inclusion in submissions. If the information seems somewhat lengthy and/or complicated, this reflects the nature of the E.I.S. itself. However, I trust there is sufficient information included in this Circular to enable you to make a submission even if you don't have the chance to read the entire E.I.S. You may have already received directly from S.E.F.A. (South East Forest Alliance) a copy of their "Eden E.I.S. Response Guide", which can also be used to help formulate a submission. Your submission can be as long or short as you wish, in the form of a letter or a detailed analysis.

PRACTICAL DETAILS

The E.I.S. is available for inspection at the following addresses:

NSW Environment Centre
1/57 Wentworth Ave. Sydney
Ph: 211 5366

Total Environment Centre
18 Argyle St. The Rocks
Ph: 274 4714

The Wilderness Society
57 Liverpool St. Sydney
Ph: 267 7929

Canberra Environment Centre
GPO Box 1875. Canberra
Ph: (062) 473 064

Environment Network Centre
Church Street. Bega
Ph: (0649) 23134

Australian Conservation
Foundation. 18 Argyle St.
The Rocks. Ph: 271497

and also at Town Libraries in Bega, Eden, Merimbula, Bermagui, Bateman's Bay, Moruya, Narooma, Orbost and Bombala, as well as at Environment Centres and State Libraries in capital cities.

The full name of the document is:

Draft environmental impact statement for the Eden (N.S.W.) export woodchip operation for the period 1989-2009, April 1986, prepared for the proponent Harris-Daishowa (Australia) Pty Ltd, by Margules and Partners Ptd Ltd.

Submissions on the E.I.S. should be sent to:

The Secretary
Department of Arts, Heritage and Environment
G.P.O. Box 1252
CANBERRA ACT 2601

Attention: Mrs A.M. White

All submissions received by the Department will be forwarded to Harris-Daishowa, who are required to take them into account in preparing the final version of the E.I.S.

In order to make sure your comments have a wider political impact, it would then be a good idea to send copies of your submission to:

The Hon. Barry Cohen
Minister for Arts, Heritage
and Environment
Parliament House
CANBERRA ACT 2600

The Hon. Bob Carr
Minister for Planning and
Environment
Parliament House
Macquarie Street
SYDNEY NSW 2000

The Hon. Barrie Unsworth
The Premier of NSW
Parliament House
Macquarie Street
SYDNEY NSW 2000

Also, send a copy to your local member of NSW Parliament, or if outside NSW, your local Member of Federal parliament.

SPECIFIC POINTS WHICH COULD BE MADE IN A SUBMISSION

GENERAL INADEQUACIES OF THE E.I.S.

File - see Jan 5 notes.

1.

It is not possible to assess the full environmental impact of the proposed woodchip operations from this E.I.S. because forestry operations are largely under the control of the Forestry Commission of N.S.W., which has not contributed to the E.I.S. as a proponent. The following quotes from the introductory section, The Role of the E.I.S., page i, illustrate the situation.

"HDA (Harris Daishowa (Australia) Pty Ltd), while nominated as the proponent of the continued woodchip operations, has little direct control over many of the aspects of the proposed operations as discussions in the document."

"The FCNSW (Forestry Commission of NSW) is responsible for all aspects of Crown forest management including planning, supervision, research, fire control and road construction."

"Accordingly, as distinct from most E.I.S.'s, the proponent (HDA) is unable to give undertakings concerning those aspects of the operation which are not under its control."

Areas where insufficient information have been provided to assess environmental impact include:-

allocation of timber resource;
supervision, control and monitoring of environmental protection measures; and
details on commitment to undertake environmental research and make research results publicly available.

Recommendations

The Approval should not be granted because
Before the full environmental impact of the proposal can be assessed, the Forestry Commission of N.S.W., must submit an E.I.S. as joint proponent under Part V of the New South Wales Environmental Planning and Assessment Act.

2.

The Objectives of the Proposed Project, as listed in the Summary, pages 2.1-2.2, fail to list one proposal of the E.I.S., namely, to increase the current export quota from 850,000 to 900,000 tonnes annually "for the remainder of the existing licence period" (page 4.11). This proposed increase is mentioned under Section 4.2.2, page 4.11, and is not accompanied by any justification beyond provision of Table 4.1B, which shows figures for "Potential Tonnages of Pulpwood and Residues (By Source) for the Remainder of the Licence Period" - these figures are almost all derived from "personal communication".

The Senate Standing Committee on Science and the Environment after its Inquiry into Woodchips and the Environment, 1977, recommended that:

"2.3.2 No increase in the quantity of chips to be exported be approved without most careful consideration of all relevant environmental factors as set out in this report."

Recommendation

The E.I.S. certainly fails to give "careful consideration" to environmental factors relevant to its proposal to increase current export quotas prior to 1989 - therefore the federal government should certainly refuse any increase in current quota tonnage.

3.

The requirements of an E.I.S. under the Commonwealth legislation, under which this E.I.S. is being assessed, include the following:

"S.4.1 To the extent appropriate in the circumstances of the case, an environmental impact statement shall -

(f) include information and technical data adequate to permit a careful assessment of the impact on the environment of the proposed action:

(h) assess the potential impact on the environment of the proposed action, including, in particular, the primary, secondary, short-term, long-term, adverse and beneficial effects on the environment of the proposed action and of any feasible or prudent alternative to the proposed action."

However, despite these requirements, the E.I.S. on page iii says: "In some instances it was not possible to assess accurately the impact of the proposal through a lack of information. As with any document of this type it must be produced using information available at the time."

This approach taken by the E.I.S. proponents is quite inadequate; the legislative requirements do not say that environmental impact assessment can be confined to information already available. If sufficient information is not available on which to base a decision, it must be obtained before the proposal is considered.

Examples of insufficient available information on which to enable impacts to be assessed include:

- lack of pulpwood yield estimates from logging regrowth thinnings over the period 1995-2010;
- no description of the water resources and hydrology of the area;
- no detailed vegetation maps for the Eden management area.

The lack of information for the Eden region contrasts poorly with the detailed information available for the neighbouring forests of East Gippsland.

Recommendation

The E.I.S. is deficient in the areas listed above, and consideration of the proposal should not proceed until sufficient information has been provided to enable potential impacts to be assessed.

TIMBER SUPPLIES

Recommendation

Figures presented in the E.I.S. indicate that the current and proposed woodchip operation is not/will not be operating on a sustainable basis - therefore the proposed operation will either

Quote under OTHER INADEQUACIES

effect an ever-increasing area of forest, or will operate without the benefit of environmental safeguards. The proposal must not be approved on either basis.

Rationale

Timber for woodchipping - pulpwood - is proposed to be derived from the following four sources. Each source is accompanied by comments on its apparent inadequacy.

i) Crown Forest (state forest) within the Agreement Area

Table 1.A.1, Appendix 1A, lists the total area available for routine wood production within the Agreement Area, which is covered by the Eden Native Forest Management Plan, 1982 (ENFMP), as 231,900 ha. This area is supposed to yield 530,000 tonnes per annum of woodchips until the year 2010, from what is termed the "old growth resource". This resource is explained as follows (Section 5.2.2.1, page 5.10): "The first cycle through the Eden forests involves a once only process by which much of the existing largely overmature and unproductive (in wood increment terms) forest will be progressively replaced by the regrowth forest."

However, elsewhere in the E.I.S., page 4.10, it is proposed that environmental protection measures will reduce the area of state forest to be used for these logging operations to 182,000 ha. There appears to be a deficiency here of 49,900 ha, which reduces the pulpwood resource from 26 years' supply to 17 years' worth of export quota from 1984 onwards (using the Forestry Commission's conversion factor of 87.9 tonnes per hectare, Table 1.A.1., Appendix 1A).

The E.I.S. does not acknowledge this deficiency. Instead it claims (page 5.10) that "the prescribed yield of 530,000 tonnes per annum can be sustained until the year 2010 or the end of the 40-year first cutting cycle. Some pulpwood from thinning is expected to become available after the year 1995." The volumes have not been assessed at this time as sufficient data is not yet available on logging regrowth.... The nett effect of the progressive switch in resources [from old growth resource to thinnings] is that the life of the old growth resource may be extended....beyond 2010".

The question needs to be asked - is this a deficiency in the information provided in the E.I.S., or is it a real deficiency in the timber resource available?

If the latter, the operation as proposed is unsustainable, as the projected timber resource is simply not there.

ii) Crown Forest (state forest) outside the Agreement Area

The proponents propose to use "silvicultural residue" and "head and butt" timber from outside the original Agreement Area designated for export woodchip supply. All figures for this resource are based on "Forestry Commission of N.S.W. personal communication" (Table 5.3, page 5.12, derived from Appendix 1B), therefore are impossible to verify. The estimated amount of timber available from this source decreases progressively up to 2010 as the normal sawlog operations decline [see (iii)].

iii) Sawmill residues

The estimated contribution of sawmill residue to woodchip export quotas from both N.S.W. and Victoria will decrease from 1985 to 2010 by approximately one third. The E.I.S. says euphemistically (page 5.12): "The hardwood sawmilling in both N.S.W., and Victoria are experiencing a reduction in the sawlog harvests to reflect sustainable yields better". What this really means is that there has been overcutting of sawlogs in the past beyond sustainable yield levels - the Forestry Commission's Eden Native Forest Management Plan, 1982, admits this on pages 35 and 36.

iv) Private property resources

When timber from private property is used for woodchipping, there is no guarantee that reafforestation will occur. Very often (estimated to be around 50% of the time) the timber is cleared in a once-only operation, with land being converted to agriculture. The E.I.S. states (page 5.13) that "resources within the 0-150km radius of the chipmill are becoming limited as much of that potentially available has been harvested". The contribution of this resource to export quotas will thus decline, and/or become increasingly expensive as supplies are gathered from further and further away from the chipmill.

Discussion under points i)-iv) shows that the timber resource seems to be simply not available to support Harris-Daishowa's operations as proposed.

Now see
218,000 ha
App 1E
At 5.9, App 1E
2nd cutting
cycle fig.
based on
regrowth
oper fig.
→ do 20
nutrient
input to
soil of
thinning
removal
E integrated
logging

Have this
out,
as weakens
argument
that
pulpwood
attraction
has →
Sawlog
resource
(∴ there
sources are
not
concurrent
E integrated
logging)

WILDLIFE

known to be
Wildlife affected adversely by "integrated logging" operations for woodchipping include:

- i) birds and mammals which require tree hollows present in old trees as homes and nests for breeding -
 - . birds - at least 14 species
 - . gliders and possums - at least 6 species
 - . some forest bats - at least 4 species

(Hollows begin to appear in eucalypts from about 50 to 100 years of age, depending on species)

- ii) nectar-feeding birds, including honeyeaters, lorikeets and silvereyes, which require flowering tree canopies of a variety of species to ensure year-round food resources;
- iii) birds which forage on mature tree trunks, notably the treecreepers;
- iv) the koala, which needs to forage in tree canopies on leaves, and is already uncommon in the area.

In 1980, Recher, Rohan-Jones and Smith (in "Effects of the Eden Woodchip Industry on Terrestrial Vertebrates with Recommendations for Management," Forestry Commission of N.S.W. Research Note 42, Sydney) said "it is considered that the existing National Parks and Nature Reserves in the Eden District are inadequate by themselves to ensure the survival of the region's wildlife."

The E.I.S. says that "....there are still many limitations in knowledge concerning the forest fauna of the area and the impact of logging and fire", page 2.12.

NATIONAL PARKS

The existing national park and nature reserve system represents the result of political trade-offs rather than a survey of adequate conservation needs. The E.I.S. admits that many tree species are poorly conserved in the existing national parks of the woodchip area. Integrated logging on the scale proposed by the E.I.S. will not ensure the conservation of the forests' wildlife because:

- Therefore,*
- i) integrated logging removes most of the very old trees required to provide nests for at least 24 species of tree-dwelling mammals and birds (gliders, pigmy possums, bats, lorikeets, cockatoos, owls, tree-creepers)
 - ii) integrated logging removes large amounts of tree canopy, needed as a food resource for, e.g., nectar-eating birds, koalas.

Adequate undisturbed areas of forest habitat and food resource are required in the form of national parks and nature reserves. Thus, additions to the national park system are essential if the region's plant and animal diversity is to be conserved.

The proposed Coolangubra and Tantawangalo National Parks would help to remedy the situation. The E.I.S. does not support these parks, but admits that the woodchip mill could continue to operate if Coolangubra and Tantawangalo became national parks. (page 6.8)

WILDERNESS

Coolangubra has been identified as a forested wilderness area by the Australian Heritage Commission and logging will destroy it. The E.I.S. white-washes this issue by choosing a narrow academic definition of wilderness. (Page 7.45).

WATER SUPPLY

The E.I.S. admits that streams may stop flowing earlier in dry weather if forests like Tantawangalo are logged (page 8.18). This would clearly threaten the town water supplies for Merimbula, Pambula and Eden.

EMPLOYMENT

1982 employment figures for the Eden region (Bega Valley and Bombala Shires) showed that forest based industry provided nearly 600 jobs (6% of the regional workforce). Although woodchipping uses up about seven times the amount of timber, it provides fewer than twice as many jobs as sawmilling.

Future employment prospects for many timber industry workers, especially in sawmilling, are not good, because there are not enough forest resources to sustain the industry at current levels - as outlined above under "Timber Supplies". It is clear from figures in Appendix 1A of the E.I.S. and pages 35-37 of the Eden Native Forest Management Plan (ENFMP) that current sawlog commitments can only be met up till 2002, and thus will run out ten years before the end of the first cutting cycle. However, in a reply to N.C.C., Forestry Commissioner Mr Wal Gentle has said that planned sawlog quota cuts will stretch the sawmill industry's life out by another 10 years.

It seems apparent that the overcutting of the timber resource is the result of Forestry Commission management policies, namely:-

- i) allowing pulpwood commitments to Harris-Daishowa to determine the rate of cutting, so that much of the region's native forest has been cut on a 40 year cycle, too short to allow regrowth of sawlogs, and not enough small trees have been left uncut to provide sawlogs in subsequent cutting cycles;
- ii) allowing overcutting for sawlogs to continue in order to meet historically determined quotas.

Conclusions

Forestry Commission forestry management policies have resulted in a situation where sawmill employment prospects are poor, and sawlog quotas need to be reduced to long-term sustainable levels. Because of past forest cutting above sustainable levels, some mills may have to close within the next 20 years whether or not further national parks are declared. The State government will have to address the problem with a regional economic development package. In the E.I.S., industry developments which could generate jobs, such as:-

- . forest-based industries involving greater wood processing
- . hardwood plantation forestry

are not considered seriously in Section 6.

ALTERNATIVES

Federal legislation requires that the E.I.S. "assess the potential impact on the environment of the proposed action and any feasible and prudent alternative to the proposed action." This E.I.S. is deficient because the following alternatives and their impacts have not been adequately discussed and assessed.

i) Hardwood plantations for the supply of woodchips.

The E.I.S. devotes only ~~half~~ a page to dismissing this alternative, (on page 6.4) without providing any justification. Although trial eucalypt plantations have been established since the early 1970's, no data from these trials are given. The impacts of hardwood plantations in terms of:-

- better utilisation of already-cleared land
- reduction ^{of} environmental impact on native forest
- provision of employment

are not even alluded to.

FC has purchased from APM, Euc. grandis successful plantation on all coast but might provide possible useful silviculture but not mentioned.

ii) Use of forest thinnings, combined with sawmill residues, as the woodchip resource.

Insufficient work has been done on the feasibility of using thinnings for the bulk of the woodchip quota. In 1980 Recher, Rohan-Jones and Smith (reference under "Wildlife" above) recommended to the Forestry Commission that:-

1. An increasing amount of pulpwood should be taken as thinnings from logging and fire regeneration. A major research program should be initiated as a matter of urgency into methods of thinnings, silvicultural effects of different levels of thinning, and the use of smaller diameter logs for pulp.
2. A greater proportion of wood should be used from each tree, and the range of wood products extended. Whole tree logging and on-site chipping should be thoroughly investigated with the economics of the operation evaluated in consideration of the likely benefits to wildlife from the diversification of the logging rotation system.

This work should have been carried out by now and its results included for discussion in the E.I.S. No work on recommendation 1. appears to have been done by the proponents, and work on 2. is only just being initiated (page 6.2).

iii) Tourism

Tried to dismiss, not talked about at all, provided no justifiable figures.

iii) Lower chip volumes.

The E.I.S. should contain a much more detailed review of alternatives to the logging of the proposed National Parks and National Estate areas.

The E.I.S. states that the exclusion of logging from areas which are on the Interim Register of the National Estate and have been nominated as national parks, notably Coolangubra and Tantawangalo, will reduce the pulpwood resource by 172,900 tonnes (page 6.7). The E.I.S. claims (page 9.7) that this will reduce the woodchip mill from a two-shift to a one-shift operation, thus reducing employment. A two-shift operation requires 715,000 tonnes per annum (page 9.7); the proponents are applying for 850,000 tonnes per annum altogether, and claim the mill would cease to be viable at 600,000 tonnes.

The E.I.S. does not make explicit the fact that if the proposed National Estate areas were excluded from logging, a maximum of less than 40,000 tonnes per annum would have to be found from additional sources in order to allow the mill to operate just above the minimum two-shift level.

One alternative source for this 40,000 tonnes could be other Forestry Commission areas outside the current Agreement Area, if it can be shown that the substituted areas are less environmentally valuable than the National Estate areas. Another possibility is that of more intensive and efficient management of existing forests, leading to a higher productivity per hectare. Plantation sources should also be considered. The E.I.S. fails to examine in detail the important question of alternative sources.

In addition the figure of 12,265,000 tonnes of pulpwood resource remaining, given in Table 6.2, and on which HDA bases its conclusions, conflicts with the Appendix 1A figure of 13,483,000 tonnes, and could therefore be an underestimate.

iv) The E.I.S. should consider alternative uses of the timber resource involving development of timber-based industries which involve increased processing in the region, thus providing employment.

✓ ENVIRONMENT PROTECTION, MONITORING AND REVIEW

The E.I.S. gives insufficient information on how environmental protection measures will be monitored for their effectiveness, especially in the publicly-owned state forests. The proponents mention in Section 10 several "prescriptions" which will be followed as environment protection measures, notably for soil erosion, for maintenance of non-wood values, and for wildlife. The E.I.S. admits (page 10.15) that "supervision and control of operations are of fundamental importance in maintaining the standards of harvesting and rehabilitation work."

The Senate Standing Committee on Science and the Environment, ^{after} ~~in~~ its 1977 Inquiry into Woodchips and the Environment recommended that:

"Renewal of existing licences for the export of woodchips be granted only when it can be shown that implementation of environmental protection measures laid down by forestry authorities, as amended from time to time in the light of new knowledge, is fully effective."

Despite this important conclusion, the E.I.S. fails to give detail on how monitoring procedures have improved in effectiveness since 1977. It admits that "the standard of implementation of snig track drainage prescriptions varied between operations." Mention is made of a training course in "harvesting" techniques provided for operators, some modifications to environmental protection prescriptions, and figures are given (page 4.47) for penalties for breaches of licence conditions (201 warnings, 93 suspensions and 1 life banning).

These indicate that a significant amount of breaching of environmental protection provisions has occurred in the past.

Recommendation

In order to give an accurate assessment of environmental impact in the future, the E.I.S. needs to contain more information from the Forestry Commission on past adherence to environmental protection prescriptions and precise specifications as to how breaches will be prevented in the future.

How is Wildlife Policy monitored?

CONCLUSION

To reiterate the central points to press for in submissions:-

- . No approval for an increase in the current export woodchip quota up to 1989 should be approved, as resource availability has not been adequately demonstrated, and all relevant environmental factors have not been considered.
- . The E.I.S. does not provide an adequate document on which to base a decision ^{on} granting of an export licence for 1989-2009, as it provides insufficient information on a number of areas (see specific Recommendations in the previous pages).
- . Harris-Daishowa's proposal for a licence to export 850,000 tonnes of woodchips per annum for 1989-2009 should not be approved as it stands because of:
 - failure to demonstrate the sustainability of the project in resource terms;
 - failure to exclude from state forests sufficient national parks and nature reserves to provide adequate sampling of, and protection for, the region's native flora and fauna.

STOP PRESS

We understand that at the A.L.P. national conference this month, the following policy on woodchips was adopted.

ALP CONFERENCE - JULY 1986

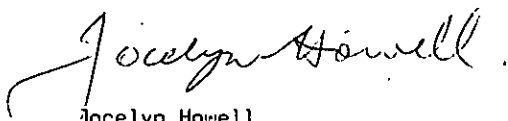
ITEM 34 - WOODCHIPS

Export licences will not be granted UNLESS

- a no feasible opportunity to undertake further processing in Australia;
- b project is subject to environmental assessment;
- c shows net economic, social and environmental benefits to community as a whole;
- d project ensures forests preserved to standards of excellence in national parks and nature reserves, excluding national estate;
- e promotes the development and implementation of an adequate regional economic strategy, incorporating the further development of the forest industry to ensure maintenance of employment levels;
- f regular public reviews provided for in licence condition;
- g project ensures long term sustainable yield;
- h comprehensive survey of national, archaeological and cultural values in all national estate areas to which the project applies has been completed by the Australian Heritage Commission.

We suggest that when you send copies of your E.I.S. submission to Messrs. Cohen, Unsworth and Carr, as suggested on page 2, you make reference to the ALP policy, and point out that approval of the proposal by Harris-Daishowa would be in particular conflict with points a, d, f and g.

Yours sincerely


Jocelyn Howell
PROJECT OFFICER

WOLLI CREEK & BARDWELL VALLEY PRESERVATION SOCIETY



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July 18, 1986

S U B M I S S I O N

Draft Environmental
Impact Statement for
the Eden (NSW) Export
Woodchip Operation for
the period 1989-2009.

By: WOLLI CREEK AND BARDWELL VALLEY PRESERVATION SOCIETY

C/- C.G. & S. Taylor
12 Walker Street,
Turrella, 2205.

1. SUBMISSION

This submission opposes the extension of the Harris-Daishowa proposals contained in the document:

Draft Environmental Impact statement for
the Eden (NSW) export woodchip operation
for the period 1989-2009.

except under the restrictions as detailed below:

PROPOSAL:

- . That the woodchip licence be extended for 10 years.
- . That the total volume of woodchips harvested in, and exported from N.S.W., be limited to 457,226 tonnes per annum.
- . That the proponent undertake and/or finance research between the years 1986 and 2000 to prove beyond reasonable doubt, the extent of sustainable yield without loss to floral or faunal habitat or variety.
- . That subject to the appropriate research and resulting public and private expert analyses of the data showing the operation to be environmentally acceptable, an extension of the licence at an annual rate of 457,226 tonnes per annum be approved.
- . That any increase in tonnage processed at the chip-mill be required to be processed to product (ie paper) in Australia.
- . That any deviation from the above conditions result in immediate termination of all licences to harvest and/or export woodchips and forfeiture of all HDA plant and equipment, subject to appropriate legal confirmation of both offence and penalty.

Our objections are detailed in section 2, Bases of Objection, and section 3, Summary and Conclusions.

2. BASES OF OBJECTION

2.1 = SECTION 3 - Objectives

3.1 Objectives

3.1 (1) "to obtain a renewal of the woodchip export licence to cover the export of 850,000 tonnes of hardwood chips per annum for the period beyond 1989 to the end of 2009."

Comment:

"The original licence (1970) was for 450,000 tons (4.1.2-p.42) and yet the current licence now allows shipment of up to 850,000 tonnes (4.1.4 - p 4.5).

In section 9.6 (p. 9.9) it is stated that the mill would cease to be viable at an output below 600,000 tonnes and in section 9.7 (p.9.10) the statement is made that the woodchip mill would close if availability for export dropped below 600,000 tonnes.

In section 4.2.2 it is disclosed that HDA is currently seeking an increase to 900,000 tonnes for 1986 to 1989.

Further, in sections 9.5.1 (p.9.5) and 9.8 (p.9.12) the possibility of a further increase to 1,275,000 tonnes is explored.

It is obvious that HDA is not going to be satisfied at anything less than this 1,275,000 tonnes and will press for an increase from 850,000 tonnes in the same way as it obtained the increase from 450,000 to 850,000 tonnes. The record shows that HDA cannot be satisfied.

3.2.2 Social Aspects

On page 3.4 para 2 it is stated:

"Informed opinion suggests that the chipmill is now so important to the socio-economic structure of the town (Eden) that if it were to close:

- . A number of businesses would also close
- . The level of services would be decreased
- . The population would reduce to about 1500."

Comment:

There is no backup data to support these emotive statements. Equally it could be suggested that without the woodchip industry:

- . Tourism would boom due to removal of logging trucks from the roads and improved amenity for tourists on the roads.
- . Areas proposed for woodchipping would retain their amenity and be used for bushwalking and similar occupations.
- . Many more N.P.W.S. rangers would be required to care for trails and assist the tourists.
- . Tourist service industries (accommodation, food, petrol, souvenirs, guided tours, boat hire, etc.) would increase greatly.

And that the job loss due to woodchipping closure would be more than compensated by the revitalised tourist industry.

The HDA statement is rejected.

Page 3.4 continues:

"Over the past 10 years, Eden has received some socio-economic 'setbacks', listed by the Chamber of Commerce as including:

- . Reduced activity in the fish processing industry...
- . The end of local tuna catching...

Comment:

These are the results of over-harvesting of a resource. Similar over-harvesting is now being proposed by HDA with the timber resource, and in the future the timber industry could become another "socio-economic setback" if this proposed activity is allowed to expand as proposed.

A little further on page 3.4 the statement is made:

"Without the project (woodchipping) the level of service (in Eden) would decline and could not be replaced by demand from any other sector."

Comment:

Again a bald statement with no backup data - it is an opinion.

On what basis is the statement "...could not be replaced..." made?

The statement is rejected.

3.2.3. Forest Management

3.2.3 (1) states that Forestry Commission staffing has increased from 2-3 to 152 people since the pulpwood industry started.

Comment:

This statement alone indicates the bureaucratic blight afflicting all of Australia, when a private operation which employs a total of 134 persons on a two-shift basis requires 150 additional bureaucrats to oversee its operations and curb the excesses of another 150 field employees (ref. section 9.7 - p.9.10) thus producing a ratio of one bureaucrat for each 1.85 productive workers.

3.2.3 (3) claims that "integrated logging" i.e. wood-chipping, has ensured the survival of sawmilling in the Eden district.

Comment:

Woodchipping allows first refusal of all timber to the sawlog industry, but does not ensure the sawlog industry can place into "reserve" younger growth which could become sawlog quality in say 30 to 40 years - anything not of sawlog quality at the time of coupe logging may go into the maw of the chipmill.

With regeneration periods of 80 to 150 years now being proposed rather than the previous 40 years period, and the admission that the actual period required to produce sawlogs is unknown (ref. 6.1.1 (2) page 6.2), the survival period for sawmilling in the Eden district has probably been shortened rather than lengthened due to the loss of the basic sawlog stock to the chipmill.

3.2.3 (4) indicates that there are:

- . Areas of fire ravaged hardwood stands unsuitable for sawlogs but adequate for woodchipping.
- . Plantation clearings which would generate waste suitable for woodchipping.
- . Hardwood stands in Bombala and Bega districts carrying a high proportion of trees too defective for sawlogs.

Comment:

Limitation of woodchipping to these sources combined with:

- . Timber resulting from obtaining access to these areas
 - . Timber resulting from obtaining access to sawlog areas
 - . Sawmill residues and waste
- must allow a continuing, viable, but smaller scale industry to exist without the environmental damage caused by the past, present and proposed future scale of operations.

3.3 Market Opportunity

This section indicates:

- . HDA is wholly Japanese owned and the price paid for the woodchips is set by the Japanese customer which owns 62.5% of the company and buys 100% of the output.
- . Japanese domestic harvest of fast-growing softwood is increasing whilst that of slow growing hardwood is declining, indicating that local plantings are probably emphasising softwood production to the detriment of the much slower growing hardwood, which is increasingly being imported by Japan.
- . Eucalypt chips are suitable for fine printing papers (a strong Japanese export) whereas softwood chips are more suitable for packaging materials - heavily used to pack Japanese exports.

Comment:

Australia is providing an increasing percentage of a slow-regenerating resource to the (ultimate) Japanese export market, at a price dictated not necessarily by competition in the international market, nor by the current or future scarcity of the resource, but by an agreement between the foreign consumer of the resource and the wholly foreign owned harvester of the resource, which company coincidentally happens to be controlled by the consumer company.

Although the price paid is "subject" to Federal approval, this approval does not necessarily mean that Australia is obtaining the best, or even a fair price.

Pricing policy should be set by Australia, as should the available supply be controlled to maintain both the industry and the price.

2.2 - SECTION 4 - Current Operations

4.2.2 Current Export Licence Resources 1986-1989

"The current export licence due for expiry at the end of 1989 permits export of 850,000 tonnes. HDA is seeking an extension of this licence to 900,000 tonnes..."

Table 4.1A shows annual export chip tonnages at intervals over the period 1970-1985."

Table 4.1A discloses total tonnages as:

1979	897,013 - at least 47,000 tonnes above licence
1983	912,583 - at least 62,500 tonnes above licence
1985	927,100 - at least 77,000 tonnes above licence

Comment:

Obviously HDA is aiming to maximise its over quota production by any (apparently) legal method.

It can only be assumed from the evidence to date that HDA will not be satisfied with approval for 900,000 tonnes (a quantity already exceeded on a number of occasions) nor even the projected 1.275,000 tonnes proposed in sections 9.5.1 and 9.8.

HDA is interested in quick profits, not sustainable yield.

4.2.3.5 Current Operations - Roads

Page 4.28 first para following section "class iv"

"However, a roading project is not necessarily abandoned if the economic case (profit from royalties vs cost of FCNSW building the road) is dubious; in such cases the FCNSW undertakes a critical review of road standards and intensity in the area and looks closely at any other benefits which may accrue from construction of the road, such as fire protection."

Comment:

Roads for fire trail access are not required to the standard of roads for logging.

Reviews such as these stated above smack of the attitude, "if we can't justify it economically we will find some other way" or "I'll keep rejecting umpires until I get one who agrees with me."

It is essential that any such uneconomic roads construction decisions be taken in an office remote from the HDA operations to ensure that the review is independent and not coloured by HDA preferences and commercial requirements.

4.2.3.6 Sawlog and Pulpwood Standards

Page 4.29 "Pulplog Specifications

Acceptable species:

All eucalypts except any from the Box, Ironbark, and Bloodwood groups (Ref. 4.1.5.)"

Ref. 4.1.5 - page 4.6

"4.1.5.1 Species

Some eucalypt species common to the area are excluded. In general, coloration of the wood and high density are the criteria used to reject a species....Conversion of pulpwood from these groups requires more bleach and gives a lower pulp yield."

Comment:

Such selectivity must lead to a change in dominant species if these trees are left standing to continue growing whilst the surrounding area is denuded of acceptable species which must regrow from seed under the canopy of the rejected species.

These rejected and unacceptable trees must therefore become the dominant seed trees resulting in an increase in their species and a reduction in acceptable species, and a less economic harvest at the following cycle.

There appear to remain only two options:

- (i) Cut and discard (ie. waste) the unacceptable trees.
- (ii) Reduce the concept of regrowth for sustainable yield and admit that basically the operation is a "once-off" exercise intended to rape the forests and get out with the profits.

4.2.3.8 Harvesting Methods

Page 4.35. para 3

"Where logs are to be salvaged from sensitive areas such as stream reserves..."

Comment:

Sensitive areas such as stream reserves should remain unlogged.

Felling of trees and dragging them along the ground with winches can only lead to certain and severe damage to these areas.

4.2.3.9 Areas Excluded from Harvesting

Page 4.37 "Category 1.1.7 'Special Emphasis Flora and Fauna Protection'

..."These areas are selected following advice from the FCNSW's wildlife research personnel. In particular advice is sought on the adequacy of reserves for the species involved.

Comment:

The FCNSW is not the appropriate body to make these decisions because of its vested interest in logging, not wildlife preservation. This is tantamount to asking a drug addict to look after the narcotics cabinet.

This control and categorisation must become a function of the NSW National Parks and Wildlife Service.

4.2.3.10 Planned Vegetation Retention

Page 38 para 1. "Wildlife habitat trees are chosen primarily by their form, trees which have numerous

nesting holes and reasonable crown development are favoured. A minimum of 5 mature trees per 15 hectares, preferably grouped together and with an undisturbed under-storey are set aside for wildlife habitat."

Comment:

Such areas are totally unsatisfactory both in size and possible location - 5 trees in 15 hectares leaves only small isolated islands without suitable corridor connections. Again, the FCNSW is not the appropriate organisation to make these decisions. The NPWS must have the authority to decide on wildlife habitat requirements and to enforce its decisions.

4.2.3.12 Fire Protection Operations

Comment:

This whole section indicates an intention on the part of both HDA and FCNSW to regularly burn areas both pre- and post-logging in order to protect the trees against fire damage.

There is no thought given to non-tree flora, nor to faunal requirements or needs.

This constant burning will remove wildlife habitat so regularly that ultimately the wildlife will either die out or abandon the area.

Further, many varieties of flora may be lost due to loss of seed stock caused by the regular burning. These varieties may be both trees and non-trees (ie. native flowers and shrubs.)

4.2.3.13 Other Forest Uses

Page 4.43 Access "...The majority of shire roads and major FCNSW roads are trafficable to normal passenger

Comment:

Personal experience of the dangers associated with logging trucks travelling together on local roads indicate:

- . On bitumen roads - almost impossible to safely overtake these speeding trucks safely. They are too large, refuse to move to the left hand side of the road, travel at excessive speed downhill, obstruct other traffic uphill and are generally a menace which should be banned from the public roads.
- . On gravel roads - cause vast dust clouds to the extent that overtaking is suicidal. The car driver must sit back and await bitumen roads and the previously noted dangers.

Further, when unloaded, there is a strong tendency for two trucks to travel close together to minimise dust problems experienced by the second truck. Cars travelling in the opposite direction could easily move off the road to allow the first fast travelling truck the road centre, but after passing this truck, move back onto the road only to be confronted head on by another speeding monster enveloped in the dust cloud.

This has been my personal experience.

There is no pleasure for the motorist (or tourist) on roads where they must joust with juggernauts.

Page 4.43 Woodchip Mill "...out of the 145,000 people who visited the Merimbula tourist information centre in 1985, approximately 20 to 30 percent expressed interest in visiting the chipmill...."

Comment:

Interest in visiting does not necessarily denote approval.

- . Does a ghoulish desire to visit the dungeons and gallows in old gaols indicate approval of the institutions?

- Do persons visiting Mme Tussaud's and viewing the murderers and rapists depicted there indicate approval of their actions?

The people expressing "interest" in visiting the chipmill could as easily be wanting to look at, with revulsion, the equipment being used to rape our forests. This EIS statement is rejected as inconclusive and misleading.

Page 4.43 Forest Based Recreation

Para 1. ... "Camping has not been identified as a high demand use of the Agreement Area forests. This is partly due to a lack of sampling statistics and also because camping is not restricted to designated camping areas within State forest. However, there are increasing numbers of enquiries for minimal facility camp sites. A lot of these enquiries represent an overflow from adjoining national park camping areas."

Comment:

This statement verifies the arguments for increased national parks in the district, particularly the proposed Tantawangelo and Coolangubra National Parks.

Tourism is an industry which is self-perpetuating on a regular (annual or more frequent) basis, and not environmentally degrading.

Economically, the annual returns from tourism IN ONE AREA are likely to be far greater than those from woodchipping, which returns must be averaged over the 60 to 150 year culling cycle and the mega-hectares destroyed.

Page 4.43 (continued) In Para 2 of this section:

"The FCNSW estimate that approximately 21,000 people visited the picnic and camping sites of the Eden forest region in the year ended 31 (sic) June 1985.

The commission expects only a moderate rate of increase in future years."

Comment:

- . If the FCNSW can count 31 days in June, what credence can be given to any of its figures?
- . However, if 21,000 people did visit the area IN SPITE OF the environmental degradation, how many are likely to visit it if the environment is preserved, even only partially?
- . What is the basis of the Commission's expectation of only a moderate increase in the future?
Loss of forest to be enjoyed?

2.3 SECTION 5 - Proposed Project

5.1 Proposed Project

"The proposal calls for the renewal of the woodchip export licence for a 20 year period from the end of 1989 to the end of 2009. It is proposed to obtain sufficient pulpwood and chips to sustain an annual export of 850,000 tonnes."

Comment:

Section 4.2.2 states that the present licence is for 850,000 tonnes. Further, it states that HDA is seeking an increase to 900,000 tonnes annually for the period 1986-1989.

Also, this same section indicates that since 1983, the actual exports have exceeded even this 900,000 figure. Why would HDA propose a reduction in its licence, for the years 1989-2009, particularly when in section 9 it explores the possibility of an increase to 1,275,000 tonnes.

The HDA statement should be rejected as insubstantial and potentially misleading.

5.2 Future Resources

On page 5.2, table 5.1 indicates a potential availability of 930,000 tonnes 1986-1989 followed by a steady decrease to 815,000 tonnes 15 to 20 years later.

These figures tend to indicate an intention to grab quick profits by overcutting now and recognising a declining resource in the years to come, ie. an intention to cut beyond the sustainable yield.

In fact there is no summary of "sustainable yield" in the document and in section 5.2.2.2, page 5.11, paras 3 and 5 it is stated:

"The potential of the area to sustain a pulpwood industry during this second cutting cycle was superficially examined by the FCNSW...

"The model used is based on limited growth rate information for regrowth forests...It is intended as being purely indicative of the capacity of the area to sustain existing yields."

Comment:

These statements sum to: "We have no definitive information on which to base our claims of sustainable yield - trust us!" Because of this lack of data, the licence, if approved, must be reduced to that quantity originally approved, ie. 450,000 tons per annum until the capacity for forest regrowth and its true sustainable yield can be scientifically evaluated.

Table 5.2 pages 5.6 to 5.10 summarises the cost/benefit aspect.

Timber - First cycle an increased yield, then reducing

to low potential. In other words, a short term gain followed by a return to pre-woodchipping low yield

- . Wildlife - Massive loss of habitat during first cycle, some increase during second cycle but an overall major loss compared with pre-woodchipping.
- . Landscape - Massive effect during first cycle with some recovery during second cycle but never returning to the pre-woodchipping values.
- . Recreation - Change from non-motorised to motorised recreation with reduction in quality of views and reduction in bushwalking areas. Does not mention the loss of recreation amenity caused by increased truck traffic to and from the chipmill.
- . Grazing and Beekeeping - No stated change in grazing values. Beekeeping potential increased due to additional access but no mention of potential objections to additional hives by increased motorised tourists' complaints about hives in accessible areas.
- . Flora - Massive effect during first cycle, with some recovery during second cycle but an overall major loss particularly in diversity when compared with pre-woodchipping.
- . Soil conservation - Major effects due to construction of roads and clearance of mature, stable ecosystem in first cycle with some recovery during second cycle but major damaging changes compared with pre-woodchipping.
- . Water quality - As for soil conservation.

Comment:

There are few benefits for Australia:

- . Short term increase in sawlog industry
- . Some jobs in the chipmill, forest cutting and trucking areas.
- . A comparatively small amount of foreign exchange income.

There are major losses for Australia as summarised above from table 5.2.

2.4 SECTION 6 - Alternatives

6.0 Alternatives to the proposal

Some alternatives are briefly explored.

- . Shortening of rotation length - ie. woodchip forests only.
HDA considers this feasible but imprudent.

- . Minimum sawlog rotation - ie. sawlog forests.

HDA mentions but does not really assess the possibility.

"It is reasonable to expect, however, that appropriate methods and technologies could be developed (for producing fast grown small diameter eucalypt logs.)

"Pulpwood would be derived from thinnings...No estimate of the volumes available has been made."

- . Improved utilisation - ie. waste less of the cut timber.

"HDA is initiating proposals to undertake field trials of smallwood utilisation."

Why has HDA waited nearly 20 years before investigation of this resource? How many millions of tonnes of potential production has been wasted?

- . Steep country logging - section 6.1.2.2

HDA quite rightly discounts this alternative.

The potential for visual pollution, erosion and consequent water catchment pollution would be unacceptably high.

- . Plantations - section 6.1.3

HDA discounts the possibility of plantations due to private and public experience of low growth rates, plant losses, etc.

Surely the proposed natural regeneration must have less chance of success over the vast areas affected, than would properly prepared and maintained plantations.

- . Other uses - section 6.2.2

Various minor other uses are mentioned such as fuel and "synthetic" timber products utilising wood fibre.

- . Exclusion of Areas - section 6.2.3.1

The Coolangubra and Tantawangalo areas exclusion is briefly considered and basically rejected by HDA.

"...any reduction in identified resources will result in a reduction in export quantities."

- . Woodchip Milling Capacities - 6.2.3.2

The upper mill limit of 1,275,000 tonnes is mentioned and the necessity for employment of a third shift to handle this capacity is noted.

The lower mill limit at which the operation would cease to be viable is quoted at 600,000 tonnes.

- . Tourism 6.2.4

This aspect of use is mentioned and dismissed with:

"There is no evidence to suggest that tourist use of the far south coast region has been reduced by the forest operations taking place in the region."

Comment:

There is no serious attempt to summarise the alternatives to the proposal - the only true alternatives are:

- . No woodchipping - this is not explored (nor is it feasible.)
- . Maintain original level - this is not explored, merely dismissed as being below a viable operating level even though it was considered viable originally.
- . Establish plantations - dismissed as non-viable due to other organisations' experiences.

In fact, if plantation growing suffers the losses in stock and quality indicated by HDA the alternative of "no woodchipping" should perhaps be more seriously considered.

2.5 SECTION 7 - Existing Environment

7.1.4 Terrestrial Flora

Page 7.19 para 2: "All 19 vegetation types described in Appendix 8A are represented in the Eden region. However, it must be stressed that the available information on the vegetation is very patchy. The types delimited are mostly rather broad categories. No comprehensive survey of the entire area has yet been carried out such that the subtler patterns of plant distribution can be documented and sites of particular botanical significance identified. In the opinion of the author (Peter Smith), such a survey is urgently needed if the adequacy of the existing reserve system is to be properly assessed."

Comment:

The above expert recommendation contained in the EIS must be followed before any consideration is given to the HDA proposals.

Failure to fully and properly investigate and document this vast area prior to its proposed total destruction for overseas commercial gain would be environmental vandalism of the worst kind and could lead to irretrievable loss of rare or important Australian flora.

7.1.11.4 Wilderness Areas

Comment:

HDA criticises the proposed Coolangubra Wilderness because basically, it is only just large enough to qualify as a wilderness area and it is not sufficiently remote from areas of human exploitation nor does it have a sufficiently large buffer zone.

If these supposed defects are in fact limitations, it only shows the willingness of the wilderness proponents to compromise on what should have been a larger area to be included as wilderness and buffer.

The arguments by HDA are considered specious and, if accepted, a greater area for Coolangubra Wilderness should be actively considered, rather than rejection of the proposal.

2.6 SECTION 8

Section 8.1.2.1 Water Supplies

Page 8.18 "Flow Duration" states:

"It is not clear, for example, if the anticipated increase in post-logging (water) yield and high flows in the Tantawangalo catchment will be achieved without a consequent increase in number of days when flow at the weir falls below critical minimum levels for water supply purposes. A greater proportion of high and low flows would mean increased dependence on storages for urban water supplies..."

Comment:

Another "it is not clear..." statement, which could also mean "we expect the worst, but there is no proof..." Should HDA receive approval for the application and these fears prove factual, large amounts of public money - probably far exceeding that received in royalties - will have to be expended in enlargement of water storage in the area. Also probable reduction of quantities available for irrigation will cause further financial loss to the State due to consequent reduced farm output.

Section 8.1.5 Terrestrial Fauna

This section generally describes the potential adverse changes to the conditions under which the fauna lives and breeds.

It would appear that very little is really known about the requirements of the fauna both in habitation and in food supplies.

It would further appear that without the exercise of extreme caution in changing the habitat of these fauna, irreparable loss may result.

Comment:

Expansion of woodchipping must be minimised until the potential adverse effects on both the flora and fauna are fully understood and methods for mitigation of adverse effects have been developed and proven.

It is obvious that there can be little control over the clearance of private property areas, and to the maximum extent practicable, public property areas must attempt to absorb and protect the displaced populations even though this may limit the extraction of natural resources from these public land areas.

Section 8.1.6. Impacts on Landscape Values

The statement is made (P.8.52, para 4) that "by the time the current licence period ends in 1989, approximately three quarters of the total harvestable forest within the Agreement Area will have been harvested or roaded and partially harvested."

This does not necessarily mean the major landscape damage will have occurred.

When the alternate coupes are harvested it is possible that the true visual damage will only then become apparent when the intervening forest is removed.

Comment:

The argument is considered specious and rejected.

8.4 Impact on other Industries

Page 8.78, para. 2

"The total impact which the HDA operation could have on each of these industries....is discussed below."

. 8.4.1 Sawmilling - para 4.

"There is no clear conclusion as to the extent of the former impact in terms of the likely scale and viability of the sawmilling industry of the area in the absence of the woodchip operation."

. 8.4.2 Transport - page 8.80, last para.

"Other aspects of the impact of the woodchip operation relate to the perceived conflicts between heavy vehicle use of roads and use by other traffic."

NB. This statement itself indicates an adverse effect (ie. 'conflict') on the tourism industry which must rely on the amenity of roads to survive.

. 8.4.3 Tourism - page 8.82

"Woodchip industry would not appear to have suppressed the growth of the tourist industry."

"The overall consensus view...there does not appear to be any conflict..."

Comment:

All of the statements are non-definitive and are not backed up with facts.

It could equally be stated, with the same degree of accuracy, that the reverse situations apply - ie.

that the existence of the woodchip industry is contributing to the demise of sawmilling due to the

techniques used and that the tourism industry has

not grown as fast as it would have without the

increased numbers of timber trucks on local roads.

The arguments are specious and should be disregarded.

2.7 SECTION 9 - Impacts of Alternatives

Section 9.1 Pulpwood Rotation Impacts (maximum proposed)

"During the period of proposed licence renewal, shortening the rotation length to about 40 years.... Additional impacts would become apparent during the period of the subsequent licence (ie. 2010-2030) in the second cutting cycle."

The positive impacts are summarised to show lower costs for greater output.

The negative impacts are summarised to show:

- . Loss of soil nutrients, exacerbated by the possibility that all or some bark would be chipped.
- . Permanent changes to the forest including severe impacts on the flora and fauna.
- . Total destruction of the sawlog industry.
- . Greatly increased fire risk.

Comment:

This alternative has nothing whatsoever in its favour except higher profits for the Japanese owners.

It should be totally and finally rejected as an alternative.

Section 9.2 Minimum Sawlog Rotation Impacts

Positive impacts claimed are:

- . Selection of silvicultural system which may allow sawlogs to be produced at an earlier age.
- . Sawlogs available to sawmilling industry earlier in the rotation.
- . Increase in wood volumes compared with those in the proposal by HDA in this EIS.

Negative impacts are similar to those in section 9.1 excepting the loss of the sawlog industry.

Comment:

Both of the above alternatives indicate a plantation type of regrowth with the intention to manage the forests in such a way to obtain a specific resource - ie. pulpwood only, or sawlogs with pulpwood from thinnings or trees unsuitable for sawlog production.

Obviously whichever silvicultural system is proposed for adoption, it will exclude unwanted tree species and will be "thinned" to allow orderly extraction of the timber at whatever time it is to be harvested.

In sections 6.1.3, page 6.4, and section 9.3.3, page 9.5 HDA dismisses the idea of managed plantations because of soil quality and low growth rates yet in these sections HDA proposes plantation type management.

The only difference between sections 6.1.3 and 9.3.3, and sections 9.1 and 9.2, is that in the former HDA would incur the costs of land purchase and forest management whereas in the latter the Australian public is expected to bear this cost in return for meagre royalties.

If the non-plantation system is a failure HDA walks out with its profits and the south east of Australia is a degraded disaster area to be rehabilitated at great public expense.

Section 9.3 Technological Changes to Harvesting

Comment:

This section contains nothing for consideration, in that there are no proposals as to the types of changes to be implemented.

The section is a "red herring" and can only be interpreted as paying lip service to the idea of impact reduction by adoption of technologically improved methods.

Section 9.4 Alternative Uses of the Resource

Comment:

Basically the section states that alternative use of the resource would not reduce the impacts.

However the only alternatives considered are those which require destruction of the forest - no non-harvesting alternatives are considered or discussed.

The issue of alternative uses has not been properly addressed and this section of the EIS should therefore be rejected.

Section 9.5 Exports of Varying Quantities

Comment:

In this section arguments are directed mainly towards the positive aspects of an increase in quantity and the negative aspects of any reduction in quantity. The negative aspects of increase are glossed over, whilst the positive aspects (to the community at large) of any reduction, let alone to the originally approved export volume, are not even mentioned.

The positive aspects of reduced harvesting are:

- . Opportunity to properly evaluate:
 - (a) Effects on flora of various techniques and cycles.
 - (b) Effects on fauna of various habitat areas and connections between areas.
 - (c) Effect of natural re-seeding vs planting
 - (d) Viability of plantations vs natural regrowth
 - (e) Effects on water runoff, high and low flow volumes, and water quality.
 - (f) Likelihood of requirement for increased water storage and/or reduced irrigation quotas.
 - (g) Likelihood of utilisation improvements and reduced forest damage by development of the technologically improved methods and equipment.

- . Reduced heavy road traffic with consequent reduction in pavement damage and increased road amenity for tourists.
- . Stable demand for community provided services to allow fulfilment of present demand before causing increases which can only be financed with expensive borrowed money.

Section 9.6 Operation at Minimum Viable Level

Section 9.7 Chipmill Closure

Comment:

These sections explore some aspects of reduced or even cessation of production.

It is not the intention of this submission to propose cessation of production.

However, the original licence under which HDA began operations was for the sale of 450,000 tons (457,226 tonnes) per annum and it must be assumed that HDA carried out its commercial assessment and made its commercial commitment on the basis of this tonnage, for a period of 20 years.

All increased shipments allowed above this figure in the years 1970 to 1986 must be considered as bonus profits and must not be allowed as arguments supporting the permanent increased tonnages.

The approved tonnage must be reduced again to the original 457,226 tonnes to allow proper evaluation as noted in comments relating to section 9.5 above.

2.8 SECTION 10 - Environmental Protection

Comment:

The section summarises on-going research and modifications to methods, brought about by earlier observation and research. Because of the admitted potential for long term adverse effects which require extensive "pre-logging" data for comparison with a long period of "post-logging" data, it is important that these operations be reduced to the minimum reasonable (total production of 457,226 tonnes per annum) until this long term research is carried out.

Surely the major effects of this slow down can only be:

- . Extended viability for both pulpwood and sawlog industries if major adverse effects do eventuate.
- . Opportunity to measure and assess measures to improve yield, minimise environmental damage, and evaluate production yields of plantations vs "managed natural regrowth."
- . Reduced pressure to harvest environmentally sensitive or National Estate areas.
- . Provision of increased non-wood values in the Eden district.

3.0 SUMMARY AND CONCLUSIONS

This EIS is a document which has been compiled with the intention of emphasising the "best" aspects, ie. those which support maximum profits for a 100% overseas owned company whilst glossing over or even completely ignoring those aspects which disclose the admitted or potential problems which result from the carrying out of the proposal. Woodchipping has now been operative in the Eden region for over 15 years and yet the proponents can only point to some jobs created and royalties paid as the positive aspects of these 15 years.

The proponent is endeavouring to obtain approval for a further 25 years of activities at a level almost double that originally authorised and uses arguments based on increases allowed in the past, to back up the claim that the operation would be marginal at best, without the proposed increase and even explores the possibility and viability of further increase to almost treble the originally approved production.

The proponent uses emotive statements to back up claims of potential losses to the area should its application not be approved, but supplies no substantiation for these emotive statements.

The proponent uses arguments of "socio-economic setbacks" rather than the truth, over-harvesting of fishing resources in the Eden district to support the application to again over-harvest the timber resource.

The proponent claims to be extending the life of the sawlog industry by opening up areas which would otherwise be uneconomic to harvest but proposes management and re-harvesting for pulpwood well before sawlogs reach maturity. There are pious assurances of potential sawlogs being reserved, but no

parameters for selection offered to allow assessment of likelihood of preservation of these trees over the 80 to 150 years needed to reach maturity as quality timber.

The proponent admits to exports over the past five years having exceeded quota by up to 77,000 tonnes per annum, and although requesting approval for annual 900,000 tonnes in 1986 to 1989 admits the available resource will be almost 100,000 tonnes less by the end of the proposed extended period (during 2005 to 2009), thus indicating an intention to harvest at a level above the sustainable yield (which term is not quantified in the EIS.)

The proponent admits that even where construction of access roads by FCNSW would be uneconomic compared with recovery value of timber, these roads may still be constructed at public expense.

The proponent admits to the exercise of selectivity in pulpwood species of trees but does not indicate the disposal of these unacceptable species. If left untouched these species would become dominant and render the area unsuitable for future harvesting following natural re-seeding.

It can only be concluded that these unacceptable species are to be felled and wasted, and the resulting regrowth will be culled to ensure removal of young trees of the same species.

The proponent admits to removal of logs from areas defined as "sensitive", such as stream reserves in spite of the environmental damage which must result.

The proponent admits to leaving as few as five mature trees per 15 hectares as wildlife habitat, and that the NPWS of NSW is not consulted on adequacy of wildlife habitat - it is left to FCNSW to make these decisions.

The proponent intends to conduct regular burning off, both before and after logging, to protect the trees from bushfire damage - no consideration is given to the potential extinction of both non-tree flora and native fauna.

The proponent admits to overflow from adjoining National Park camping areas into the areas being or to be logged, yet opposes the creation of new national parks and wilderness areas because they contain timber suitable to the proponent's activities.

The proponent analyses the cost/benefits aspects to show there are massive losses of wildlife habitat, landscape values, floral diversity, soil conservation values and water quality in the early stages with some small recovery later (but to nowhere near that existing pre-proponent) and some modifications to the recreation (passive rather than active - ie. a loss) and the grazing and beekeeping potential. The only benefit disclosed is an increased wood (not necessarily timber) yield on the first cutting cycle which is not maintained on the second or further cutting cycles.

The proponent considers alternatives in a most cursory manner and basically concludes that there is only one use for the area - to be harvested for timber.

- . Establishment of plantations is shrugged off as uneconomic.
- . Minor uses of timber to produce "synthetics" is mentioned.
- . Tourism is quickly dismissed.

In fact, there is no real consideration of any alternatives other than the tonnage of woodchips to be exported - 600,000 tonnes, 1,275,000 tonnes, or even more.

The proponent intends to devastate vast areas of forest yet admits that only cursory classification of floral communities have been carried out and that its own expert opinion is for comprehensive surveys to be carried out before harvesting.

The proponent denigrates the proposals for the Coolangubra Wilderness basically because both it and its buffers are too small to qualify in the proponent's chosen definition. The proponent therefore wants the proposal ignored rather than the proposed boundaries extended.

The proponent admits that urban water supplies may be affected by the intended activity and that irrigation water quotas may suffer because of this, yet offers no financial guarantees to insure Australian society against the future costs of making good the potential loss of water supplies and supply of storage to replace stream flow.

The proponent admits that very little is known about the terrestrial fauna inhabiting the area, yet proposes an activity which may lead to disastrous changes in the faunal population, even extinction of certain types in the area.

The proponent suggests that technological changes to harvesting methods may result in environmental improvements, but offers no proposals as to the type or extent of these changes, nor to the form the environmental improvements may take.

The proponent examines the exports of varying quantities of woodchips but starts argument at 600,000 tonnes (minimum) which is itself 33.3% above the quantity accepted for commercial evaluation and decision in 1970, and continues to argue for increases to 1,275,000 tonnes or more, claiming that less than 600,000 tonnes would be

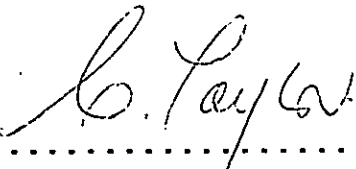
uneconomic and lead to mill closure - an emotive statement guaranteed to gain some uninformed support, but which must be economically and publicly justified if it is to be accepted.

The proponent lists numerous studies in progress, and modifications to technique in harvesting and management developed over the past 15 years experience. The volume of this research and number of modifications only backs up the arguments that too little is known about the environment and ecology of the proposed woodchip area to allow unfettered harvesting of the type rampant in the past.

PROPOSAL:

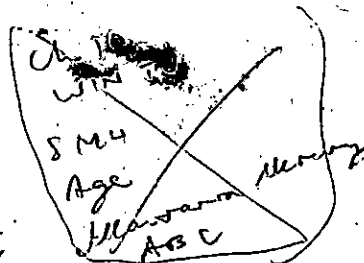
- . THAT the woodchip licence be extended for 10 years.
- . THAT the total volume of woodchips harvested in, and exported from NSW, be limited to 457,226 tonnes per annum.
- . THAT the proponent undertake and/or finance research between the years 1986 and 2000 to prove beyond reasonable doubt the extent of sustainable yield without loss to floral or faunal habitat or variety.
- . THAT subject to the appropriate research and resulting public and private expert analyses of the data showing the operation to be environmentally acceptable, an extension of the licence at an annual rate of 457,226 tonnes per annum be approved.
- . THAT any increase in tonnage processed at the chipmill be required to be processed to product (ie. paper) in Australia.

- . THAT any deviation from the above conditions
result in immediate termination of all licences
to harvest and/or export woodchips, and
forfeiture of all HDA plant and equipment,
subject to appropriate legal confirmation of
both offence and penalty.



.....

Colin Taylor
Chairman



N.C.C.'s GPY

(Park)

FORESTRY AND FOREST PRODUCTS INDUSTRY COUNCIL

STRATEGIC PLAN

Has arisen out of the Economic Summit
+ Accord, tripartite, govt.
industry
workforce.
only 4-5 unions.

INDUSTRY COUNCILS' SECRETARIAT

December 1985

FORESTRY AND FOREST PRODUCTS INDUSTRY COUNCIL

STRATEGIC PLAN

INDUSTRY COUNCILS' SECRETARIAT

December 1985

TABLE OF CONTENTS

	page
Executive Summary	(i)
1. Introduction	
1.2 Challenges and Approaches	1
1.3 Situation Analysis	2
1.3.1 Internal Characteristics	
1.3.2 External Characteristics	
2. Strategy	
2.1 Strategy Development	4
2.2 Resource Issues	4
2.2.1 Volume and Quality Requirements	
2.2.2 Security of Supply	
2.2.3 Public Awareness	
2.2.4 Industry Consultation	
2.3 Cost Competitiveness	5
2.3.1 Forest Resource Costs	
2.3.2 Productivity	
2.3.3 Rationalization	
2.4 Research and Development	7
2.4.1 National Co-ordination	
2.4.2 Other Sectoral Issues	
2.5 Domestic Market Development and Promotion	8
2.6 Export Market Development and Promotion	9
2.7 Attitudes to Change	9
2.8 Future Directions for the Industry	10
3. Conclusion	11
APPENDICES - Sector Strategic Plans	
A - Forestry	12
B - Native Sawn Timber	19
C - Softwood Sawn Timber	30
D - Wood Based Panels	38
E - Pulp and Paper	51
F - Furniture	60
G - Export Woodchips	68

EXECUTIVE SUMMARY

This report contains strategies and policy proposals developed by the Council with the aim of achieving a higher rate of growth in output and employment in the forestry and forest products industry.

A report completed for the Council by a Finnish consulting company, Jaakko Poyry, indicated that the industry has the potential to achieve long term competitiveness at an international level, and that in some sectors it is already so placed. The report also identified the lack of sufficiently large volumes of wood in suitable locations as a major obstacle to future industry growth.

The Council believes that opportunities for growth lie in further import replacement and the development of new markets, both in Australia and overseas, and new products, particularly those with high added value.

To realize these opportunities, the Council has identified four key challenges that need to be addressed. These challenges are:

- . to obtain a commitment from the Commonwealth and State Governments to maintain and, in strategic locations, increase the secure supply of wood to industry, and to provide an environment conducive to further investment in both the public and private forest resource;
- . to upgrade industry research and development facilities and to improve technology transfer and interaction between industry, research establishments and Government;
- . to improve and co-ordinate domestic market and product development, and promotion by the industry; and,
- . to develop substantial export sales.

The report discusses the means by which these challenges are to be met.

The Commonwealth and State Governments have a crucial role to play in the industry's future development because of their control over the majority of productive native and plantation forests and land use decision making. The supply of sufficient strategically located volumes of timber suited to industry needs and adequate tenure over the resource is a pre-condition for industry to undertake investment and to improve competitiveness. Without such a commitment and associated action, the impact of strategies developed by the Council to address other issues will be substantially diminished.

For its part in establishing an adequate resource base the Council has developed strategies to improve the public perception of the industry, to improve consultation between industry and forest growers, and to undertake joint action on a number of other specific resource issues by industry, unions and Government.

Having established an adequate resource base, improved cost competitiveness will be achieved by investment to upgrade and expand the capital stock, greater utilization of existing industry capacity and rationalization.

Council has identified the need for increased research and development on product and process technology. There is also a need for a co-ordinated, aggressive marketing thrust to establish a national approach to market development, product promotion and to significantly improve export performance. As a major new initiative to address these matters the Council recommends that consideration be given to the establishment of a national statutory corporation.

In addition, sector level mechanisms for tripartite action on related specific issues have been suggested by the Council.

The nature of the forest resource has also necessitated consideration of industry needs 25 to 80 years ahead as well as short and medium term issues. The Council has established a mechanism for industry-grower consultation to provide a long term forest development proposal for Government based upon a vigorous export orientated industry.

1. INTRODUCTION

The work undertaken by the Forestry and Forest Products Industry Council (FAFPIC), since its inception in May 1984, has been aimed at development of strategies and policies to achieve a higher rate of growth in output and employment in the forestry and forest products industry.

*need to make
tree grow
faster!*

The forestry and forest products industry accounts for a significant proportion of manufacturing activity in Australia. The industry includes such diverse activities as forestry, sawmilling, the production of veneers and manufactured boards, pulp and paper, furniture and woodchips.

The industry had a turnover of approximately \$6 800 million in 1983-84 and employed close to 92 000 persons. Exports accounted for almost \$300 million.

ca. 5%

Australia however does not have sufficient forest resources to meet its needs. In 1983-84 imports were valued at over \$1 300 million, and Australia's position as a net importer of wood products will continue as the forest resource presently available for wood production is insufficient to meet projected Australian demand at least for the next 35 years.

1.2 Challenges and Approaches

In preparing strategies for industry development, the Council has worked on the basis that the industry in general has significant opportunities for growth in domestic markets, and to a lesser extent, in exports in the short term. This view has been confirmed by a Finnish consulting company, Jaakko Poyry, who undertook an examination of the international cost competitiveness of the industry for the Council. The consultant found that a large proportion of imports could be replaced by domestic production depending on the availability of wood.

The Council recognizes that development of these opportunities will be dependent on the constructive involvement of all parties in the industry - Government and unions included. Against this background working parties of the Council were established to undertake a separate analysis of each of the 7 major sectors within the industry - forestry, native sawn timber, softwood sawn timber, wood based panels, pulp and paper, furniture and export woodchips.

Working parties concentrated on the identification key steps necessary to improve sectoral growth in the short to medium term (5 to 10 years) and in the longer term with respect to the forest resource where forest growth rates vary from 25 to 30 years for softwoods and 50 to 80 years for hardwoods.

The sector working party reports (see Appendices 1-7) have highlighted 4 common issues crucial to the future development of the sector. They are:

- . to obtain a commitment from the Commonwealth and State Governments to maintain and, in strategic locations, increase the secure supply of wood to industry and to provide an environment conducive to further investment in both the public and private forest resource;
- . to upgrade industry research and development facilities and to improve technology transfer and interaction between industry, research establishments and Government;
- . to improve and co-ordinate domestic market and product development, and promotion by the industry; and,
- . to develop substantial export sales. ~ of what?

1.3 Situation Analysis

An analysis of the strengths and weaknesses characteristic of the forestry and forest products industry - which are to some degree controllable by the industry - and the opportunities and threats imposed on the industry through the markets in which it operates has formed the basis of the development of strategies and policies for the industry.

1.3.1 Internal Characteristics

Strengths

- . Uses a renewable natural resource
- . Available softwood resources are currently expanding
- . Unique high quality resource which is attractive to domestic and export markets
- . Efficient use of forest resources
- . Low rate of protection and subsidies
- . Diverse range of products

Weaknesses:

- . Insufficient forest resource in appropriate locations to support further world scale industry development
- . Uncertainty about long term supplies of forest resource
- . Lack of security of supply is an impediment to investment
- . Long lead times for forest development makes the industry vulnerable to lack of continuity in public sector planning and unattractive to the private investor
- . A number of sectors are characterized by small to medium scale operations which are not, in general, internationally competitive

Just just
doesn't
have
enough
forests!

- . Lack of co-ordinated market development and product promotion
- . Predominant domestic market orientation
- . Lack of co-ordinated investment in research

1.3.2 External Characteristics

- Opportunities:
- . Exports based on unique, quality resource and internationally competitive processing plants in some sectors
 - . Proximity to high growth Asian and Pacific Basin markets
 - . Greater penetration of local markets and increased market share
 - . Greater utilization of regrowth resources

- Threats:
- . High existing import penetration in a number of sectors
 - . Low cost, frequently subsidized or dumped imports in some sectors
 - . Expanding low cost resource in some Pacific Basin countries
 - . Competition from non-wood substitutes

2. STRATEGY

2.1 Strategy Development

The Council has deliberately framed its strategy recommendations in general terms. The aim of this approach is to provide for maximum consultation with all interested parties on the general thrusts proposed by the Council prior to the development of detailed actions. It also allows for considerable input from those parties on the means whereby these proposals might be actioned.

The working parties of the Council focussed on the identification of strategies for development which could be adopted to address specific sectoral issues. Nevertheless because of the integrated nature of the industry the issues addressed in the sector working party reports contained a strong degree of commonality. These fell into 5 categories:

- . Forest resource
- . Cost competitiveness
- . Research and development
- . Domestic market development
- . Export market development

2.2 Forest Resource Issues

This section of the strategy concentrates on the need to establish a secure forest resource base, sufficient to enable development and expansion of the industry. Although the issues related to resource development differ to some extent between native and plantation timbers, the following key issues have been addressed by the Council.

2.2.1 Volume and Quality Requirements

The Council believes the primary need in relation to resource volumes is to secure the existing land base. While State Governments have control of the land base the Commonwealth can also seriously effect the land base available for wood production through the use of legislation such as the Australian Heritage Act. Due consideration must be given to the effects that this Act, and simliar legislation, can have on the industry when their use is being considered. Government must be aware of the serious implications of the withdrawal of any of the land base currently assigned to wood production and act accordingly.

In addition, the Council considers there is a need to implement a program to expand the forest area in strategic locations and improve forest productivity, especially in relation to native timbers but also softwoods. A reafforestation program developed by the Commonwealth and

State Governments, funded in part by the roll over of existing softwood loans is recommended, in conjunction with the development of initiatives to encourage private forestry.

2.2.2 Security of Supply

Inadequate tenure over the forest resource has been identified as a major impediment to the development of an efficient cost competitive industry. Strategies developed to address this problem include the need for a review of timber supply agreements by State Governments and industry to ensure that they facilitate the development of efficient industry operations, particularly in terms of resource use and industry structure. The Council recommends that State Ministers change agreements where they are not conducive to industry efficiency.

} a public resource!

what about sustainable yield!

2.2.3 Public Awareness

The Council has identified the need to obtain greater community acceptance of wood production as a legitimate land use, compatible with retention of other forest values, and of the value and significance of the forest products industry generally, as an important pre-condition to Government action on the problem of resource supply. Programs which promote recognition of multiple resource use concepts are to be aimed at fostering improved community perceptions about production forestry by State forest services and private forest owners.

The Council has found however that there is a lack of effective co-ordinated industry action on this matter even though the industry is acutely aware of the importance of favourable community attitudes toward its operations. Although discussions on how to resolve this problem are continuing, the development of a national approach to strengthening the forest products industry is seen as particularly important (see 2.4.1).

2.2.4 Industry Consultation

An improved program of consultation between industry and forest growers is required with respect to future resource needs - volumes, quality and security of supply. Committees, consisting of State forest services, private growers and industry sector representatives are to be established whose objective will be to provide ongoing advice to Government on wood supply strategies. These discussions will focus on examining, in detail, industry resource needs in both the short and long term. Such a process would be integrated with supply and demand projections provided to the Australian Forestry Council and act as a means for dialogue with State Governments on resource requirements.

2.3 Cost Competitiveness

The Jaakko Poyry report indicated that although the industry was generally cost competitive on the domestic market this was largely due to the high level of natural protection

inherent in the industry as a result of large ocean freight costs relative to product value. The consultants identified high manufacturing costs associated with fairly small mill sizes, and high ocean shipping costs as a factors limiting export potential at present.

Cost containment through better control of raw material and energy costs, and improved productivity is vital to increase competitiveness against substitute non-wood products, imports (current and potential) on the domestic market and to maximize export opportunities in Asia and other international markets. The containment of Government charges, particularly in relation to energy and the transport infrastructure, is also important to the industry's development.

Although the Council has identified a need for the industry to address these issues it recognizes that considerations associated with the achievement of cost competitiveness at an international level are essentially the responsibility of individual companies rather than the industry as a group. As such the scope for developing specific recommendations is limited. However the following issues have been addressed by the Council.

2.3.1 Forest Resource Costs

The Council appreciates that resource prices should reflect growers costs and margins in growing wood for commercial purposes but believes that industry development could be assisted if the collection of resource charges was geared to cyclical fluctuations in demand. However, as the forest resource is the major raw material input throughout the industry, significant opportunities exist to improve cost competitiveness by ensuring that forestry operations are also cost efficient. The Council understands that growers and users will have different perceptions about resource pricing issues however it believes that there is scope for State forest services and industry to examine forest growing and harvesting practices to identify where improvements can be made. Issues such as logging prescriptions and administrative and operational methods have been identified by some sectors as areas warranting examination.

2.3.2 Productivity

The Council considers that productivity is a key area in relation to the industry's cost competitiveness, particularly in view of the consultants finding that unit production costs were high relative to some competing countries.

Productivity is essentially a corporate responsibility however the Australian Productivity Council (APC) is currently examining ways in which training programmes, waste reduction, quality control and more effective staff management within the industry can be addressed through the Council. The APC is also examining the possibility of using pilot programmes in key organisations within sectors.

2.3.3 Rationalization

Considerable rationalization has taken place in a number of sectors in recent years however in a number of cases change has been severely inhibited by the uncertainty created by Governments withdrawing resources from commercial use and reducing long term security of access to the forest resource. An assured resource with security of tenure is essential if industry is to invest in more efficient plants.

Other action to assist the industry to rationalize and further upgrade capital stock through an industry restructuring program should include:

- . the removal of impediments to necessary restructuring such as State forest service log allocation policies, particularly in relation to the hardwood sawmilling sector where rationalization to develop higher value added markets is required;
- . provision by Government of identified financial and taxation incentives and assistance, principally in the hardwood and pulp and paper sectors; and,
- . joint development of credible ideas for rationalization by industry participants.

2.4 Research and Development

The structural complexity and relative fragmentation in the industry, particularly forest products sectors such as native sawn timber and furniture production, has created a number of difficulties in achieving necessary levels of research and development.

Research and development in the industry is principally carried out by the CSIRO and in the forestry sector, the State forest services. Universities, colleges and some wood processing companies also make small but notable contributions. Research funding is primarily through the public sector with the private sector contributing less than 20 percent of annual funding.

2.4.1 National Co-ordination

Most sectors have drawn attention to the need for an increased program of research and development in relation to both process technology and product development. Plans for continued import substitution and development of export markets will be substantially assisted by an increase in research and development.

The 150 percent taxation concession on research and development expenditure represents a valuable initiative although structural characteristics in some sectors - fragmentation and the predominance of Government funded research institutes - will tend to limit its impact.

The Council recognizes that the additional funding required for research and development will have to be provided by both industry (growers and processors) and the Commonwealth Government. Such an initiative however will require an entirely new approach if it is to avoid the problems of fragmentation in administration and funding between the industries' sectors.

The Council suggests that consideration be given to the establishment of a national statutory corporation to encompass all sectors in the industry. This body could form the basis for national direction and co-ordination of research and development between Government and industry. The corporation could also be involved in domestic and overseas market research, technology transfer, product promotion and training. Funding for the body would be sought on the basis of an industry wide levy and a matching Commonwealth grant, similar to other rural industry research funding. The Council understands however that consultation will be required throughout the industry if this proposal is to be further developed.

2.4.2 Other Sectoral Issues

Sectors within the industry have identified a number of additional needs associated with research and development. These include the development of wood based construction systems for buildings, improved technology transfer to end users and streamlined product approval procedures. Although many of these issues can be addressed by a national corporation with responsibility for co-ordinating and planning research and development in the longer term a number require immediate attention.

Increased co-operation is required between industry and Commonwealth and State agencies in the development and funding of research. In a number of sectors research facilities need to be up graded on a joint funding basis and research carried out by these organizations need to have a particular industry focus to address tactical research problems which undertake research into the production of viable high value added products.

2.5 Domestic Market Development and Promotion

The Council has also identified that the structure of the industry and diverse range of products produced, has lead to difficulties in developing a common approach to market development and promoting the use of forest products. The market environment in which the industry operates is expected to become increasingly competitive through aggressive marketing of non-wood substitutes and imports. The development by each sector, of a national approach to market development and product promotion, will be vital to improving the overall prospects of the industry in this environment.

Options for developing a national sectoral approach have been identified by the Council. These include:

- . the extension or formation of national marketing bodies for each sector; and,
- . the role of the national corporation (refer 2.4.1) beyond that of conventional research and development to include market research and development, and product promotion. Such a body would need to establish and maintain considerable consultation with existing sector marketing/promotion groups.

Sector working parties have identified that co-operation with other sectors in market development, and product marketing to develop new markets is important to the industry's future.

In a number of sectors a nucleus for these developments is already in place in existing organizations.

2.6 Export Market Development and Promotion

The Council recognizes that both the available forest resource and the industry's cost base is presently not conducive to large scale export performance although significant exports of some products have occurred, notably woodchips. The Council believes that it is reasonable to expect that the current export performance of the industry can be significantly improved if an infrastructure to promote awareness of the need for the development of export initiatives by the industry were created.

This might be achieved by:

- . collection and dissemination of information concerning export market potential in the industries and export opportunities through joint national action by industry and Government. Such action would be assisted by the Department of Trade extending its Global Marketing Plan for product development to include forest products;
- . expanding industry awareness of the range of programs offered by Government to assist in the development of export opportunities; and,
- . developing a joint national approach to the export of forest products between growers and processors.

2.7 Attitudes to Change

Good working relationships at all levels in the industry will also be important to growth. The full benefit of any upgrading of production capability will only be fully realized through industry-wide support by shareholders, management and trade unions, of the necessity for change involving:

- . changes to the structure of the industry;

- . the greater use of more appropriate and effective technology, preferably from Australian sources;
- . the provision of adequately trained staff to enable the transfer of technology;
- . a lower cost structure; and,
- . increased productivity.

To be effective, changes within the industry should be planned with selectivity in the type, and timing of introduction, and should provide for the involvement of the appropriate trade unions. Consultation and planning should take place at a level commensurate with the change proposed and should involve representatives from the employers, trade unions and employees who would be involved in the implementation of change.

The Council recognizes however that the mechanism for fostering better relations will initially require discussion to develop a possible structure for consultation at all levels in the industry.

2.8 Future Directions for the Industry

Due to the nature of the forest resource, the development of the industry in the long term necessitates examination of industry needs and opportunities 25 to 50 years ahead. Nevertheless the Council recognizes that differences exist between the various forecasts of future demand and that long term strategies cannot be simply predicated on one particular set of forecasts. Two thrusts are fundamental to the Council's view of the long term issues.

- . The industry will progressively undergo a fundamental change in orientation from a predominantly passive and domestic market orientation to one of aggressive cost competitiveness at an international level.
- . As the Jaakko Poyry study indicates, Australia is one of the few countries where the necessary prerequisites and inputs, such as land, capital, technology and a stable political environment, are available for large scale forest and forest industry development.

The Council therefore believes that long term opportunities exist for substantial import replacement, for some significant export development, and for a progressive reversal of some of the historical trends through the development of new, better and/or cheaper wood products. However, the commitment by Commonwealth and State Governments to long term expansion and development of the forest resource in suitable locations and on a sufficient scale at these locations is a critical requirement for the realization of these opportunities.

The Council is confident of the capacity of Governments, industry and unions to realize the long term goals of cost competitiveness at an international level, and significant export growth. It urges that the Commonwealth and State Governments, in particular, recognize the critical role of the further development of the forest resource at strategic locations.

3. CONCLUSION

In conclusion, the Council firmly believes that there are excellent prospects for growth within the forestry and forest products industry given full commitment by Commonwealth and State Governments to addressing long term resource issues.

FORESTRY SECTOR STRATEGIC PLAN

1. OBJECTIVE

To establish a secure forest resource base sufficient to enable competitive forest products sectors to expand and take advantage of domestic and export market opportunities.

2. SITUATION ANALYSIS

- . State Governments own and control most of the forests used for wood production. The area controlled by the States comprises 11.7 million hectares of native forest and 0.56 million hectares of plantation. Private resources account for 10.9 million hectares of native forest, with varying degrees of wood production capacity; and 0.25 million hectares of plantation.
- . Australia imports a substantial part of its wood and wood product requirements. Indications are that the forest resource likely to be available for wood production will continue to be insufficient to meet Australian demand for the next 35 years at least.
- . Over the last 10 years, large areas of native forest have been placed under conservation status which denies their use for wood production. These withdrawals have reduced future wood supplies and are resulting in job losses and increased dependence on imports. Further withdrawals would cause a worsening of this situation.
- . Lack of security of wood supply is an impediment to investment which is required if the forest products industry is to improve its competitiveness against imports and develop export markets. Government commitment, both Commonwealth and State, to securing and expanding the forest area available for wood production is essential to the development of an internationally competitive industry.
- . The long lead time between the establishment of forests and their maturity for harvesting causes forestry to be relatively unattractive to the small scale private sector investor. Attractive royalties are required to ensure continuation and expansion of private forestry.

3. STRATEGY

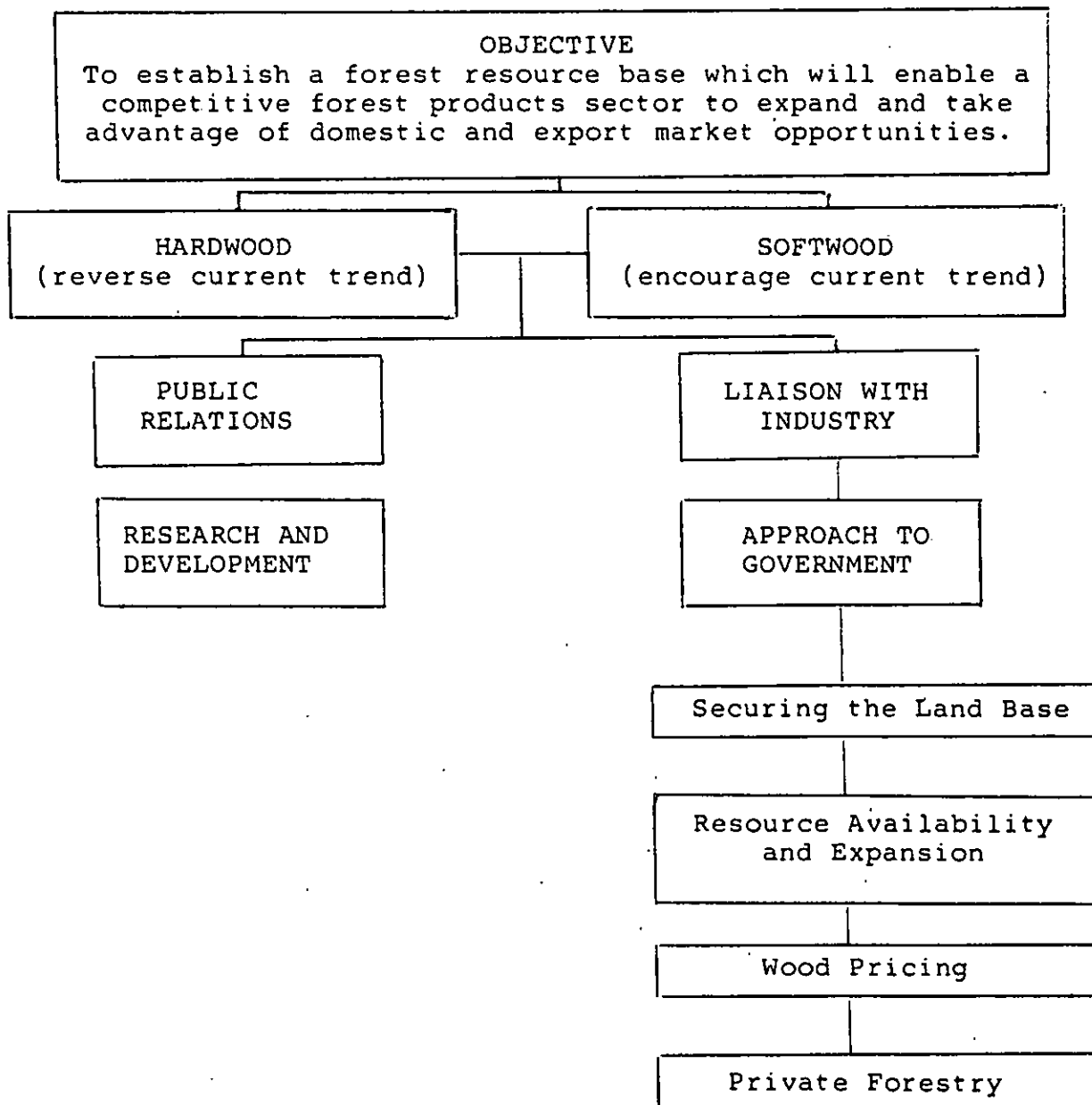
The strategy has the following main components:

- . ensuring a secure land base for long term forest production by resisting further withdrawals of forest

from wood supply and providing appropriate security of supply to enable the forest products industry to invest with confidence;

- . expansion of the hardwood and softwood resource and improved hardwood productivity to take advantage of identified market opportunities; and,
- . achievement of royalty levels adequate to encourage forest owners to practice effective forest management.

In order to achieve the sector objective, a series of interrelated steps, detailed in the following diagram, are required.



3.1 Public Relations

Sound public relations are essential to the successful implementation of the strategy.

Action:

Ensure community recognition of wood production as a legitimate land use and of the value and importance of the forest products industry generally. Programs which develop such recognition must improve community perceptions about the environmental effects of production forestry.

Responsibility:

State forest services and private forest owners, through the Australian Forest Development Institute, to initiate education programs orientated towards both the school system and general audiences. The Standing Committee on Forestry and FAFPIC could maintain an overview of this program.

Timing:

Programs are underway, but an immediate escalation for a five year period is required.

3.2 Liaison with Industry

This would provide the forest growers with a details of what industry requires to expand and take advantage of market opportunities and industry with information on current and future resource availability.

Action:

A program of consultation between growers and industry is to be developed to discuss future resource needs - security, volumes and quality. Such consultation should consider the future end use requirements and opportunities for hardwood and softwood in domestic and export markets.

Responsibility:

State forest services are to establish committees consisting of public and private growers and industry representatives whose objective will be to provide advice on wood supply strategies. Where such committees exist FAFPIC should review their adequacy.

The Standing Committee on Forestry and FAFPIC should review progress and integrate with supply and demand predictions.

Timing:

1986.

3.3 Approach to Government

The creation of an acceptable public attitude to production forestry and adequate liaison between growers and industry is a pre-requisite to successful negotiations with Governments.

3.3.1 Securing the Existing Land Base

Action:

Ensure Commonwealth and State Governments recognize the capacity of forestry and forest based industry to create wealth and employment and hence make Government aware of:

- . the serious implications of the withdrawal of any of the land base currently assigned to wood production; and,
- . the serious effect the Commonwealth Government can have on the land base available for wood production through the Environment (Impact Proposals) Act, Australian Heritage Commission Act and use of external affairs powers.

Responsibility:

The forest owners and users, through FAFPIC, to jointly advise the Minister for Primary Industry and in turn State Ministers at Australian Forestry Council.

At a State level, State forest services and industry associations should make Commonwealth and State politicians aware of the issues and their importance to the industry's future and seek commitment to secure the land base for commercial forests.

FAFPIC to monitor progress.

Timing:

Urgent.

3.3.2. Resource Availability and Expansion.

Action:

Provision of timber agreements that will facilitate and encourage the development of an internationally competitive forest products industry. Such agreements should facilitate and encourage desirable rationalization in the industry.

Responsibility:

State forest services and industry associations, through FAFPIC, to request State Ministers to examine timber agreements against the need to encourage efficient industry operations and structure. Where agreements are found to be inadequate they should be altered.

The Standing Committee on Forestry and FAFPIC should monitor progress with this matter.

Timing:

Immediate where such reviews are not taking place.

3.3.3 Regional Opportunities

Action:

Ensure State Governments recognize regional constraints and opportunities to develop an integrated regional forest products industry on a scale that will facilitate international competitiveness and maximize the industry's contribution to the Australian economy.

Responsibility:

State forest services, private forest owners and industry to jointly advise appropriate State Governments where opportunities exist. Advice should also be provided to the Minister for Primary Industry by FAFPIC and in turn to State Ministers at Australian Forestry Council.

Within States, forest owners and industry, through FAFPIC and industry associations to make State politicians aware of the issues.

FAFPIC to monitor progress.

Timing:

After identification of the opportunities through industry liaison committees established under 3.2.

3.3.4 Afforestation

Action:

Implementation of a program to expand the forest area, and improve productivity, especially in native hardwood forests but also softwoods. The main emphasis should be on establishing forests for wood production but projects which primarily serve environmental and conservation objectives might also be included.

Responsibility:

FAFPIC recommends that the Minister for Primary Industry establish a program, in consultation with the States, to jointly fund a land purchase and afforestation and hardwood forest improvement program. A worthwhile program would require funding of at least \$5 million per annum for 10 years. Projects which primarily serve objectives other than wood production should be funded by non-repayable grants. Roll over of existing softwood loan funds should also be considered.

The Standing Committee on Forestry and FAFPIC to keep the matter under review.

Timing:

Immediately after consideration by the Standing Committee on Forestry and input from State forest services.

3.3.5 Wood Pricing

Action:

Achieve royalties which provide a fair rate of return to efficient forest growers with adjustment over time to reflect cost movements.

Responsibility:

As Governments are the dominant forest owners, they play the key role in determining resource prices. State forest services and private forest owners should request State Ministers to examine current royalty rates with a view to adjusting them to provide reasonable incentives to proper forest management with due regard to the price industry can afford to pay.

Timing:

To be undertaken in conjunction with the review of timber agreements.

3.3.6 Private Forestry

Action:

It is likely that satisfactory returns on investment will continue to be achieved by large industrial forest owners. On the other hand, there is also a place for the smaller, private forest operator - for example agro-forestry. Active encouragement should be given to ensure that private growers continue to contribute to the resource base. Indications are that exploitation and land clearing considerations may currently outweigh sound forest management practices on some private land.

Innovative marketing arrangements should be encouraged between Governments, industry and landowners through joint ventures as is currently happening in some regions. Governments, in addition to providing funds for State forest activities, should also actively encourage the establishment and sound management of private forests.

Responsibility:

State forest services and the Australian Forest Development Institute to examine in detail. There is also a significant rôle for the Commonwealth and State Governments and FAFPIC

recommends that the Minister for Primary Industry and the Australian Forestry Council consider this matter.

Timing:

For consideration at the 1986 Australian Forestry Council meeting.

3.4. Research and Development

Seek early expansion of co-ordinated programs of research in the areas of forestry, logging, wood utilization and forest economics.

Action:

The Council is aware that the Standing Committee on Forestry is currently reviewing issues relating to research in the industry. Co-ordination of research effort, communication and dissemination of results and the form and basis of forest research funding are areas of particular concern. The Council strongly endorses the need for this review, and for review as a continuing operation.

Commonwealth and State Governments and industry must recognize the importance of the forest based industry and ensure that soundly based research and development be identified and adequately funded.

Responsibility:

The Standing Committee on Forestry should continue, through its research working groups, to give special emphasis to identifying current gaps in research and to developing integrated programs to cover these gaps.

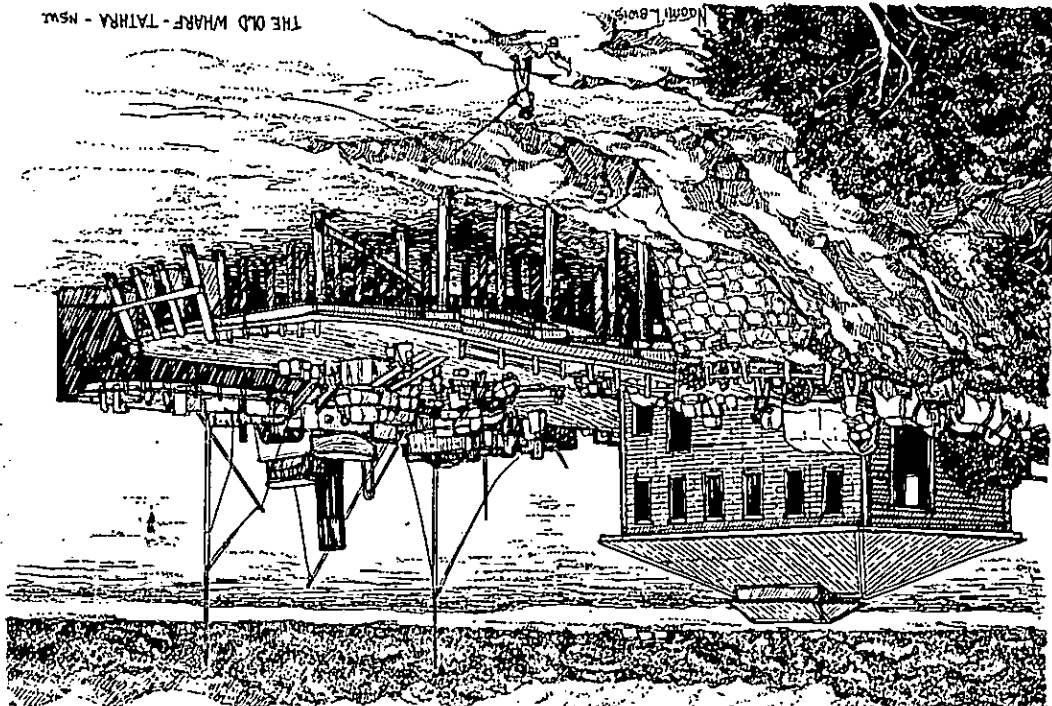
The Commonwealth Government should give special consideration to increasing research and development grants to the industry.

The State forest services and sector associations should also give urgent consideration to future funding of research, for example, the possibility of imposing levies on production and establishment of a national statutory corporation in accordance with the Commonwealth Rural Industries Research Act.

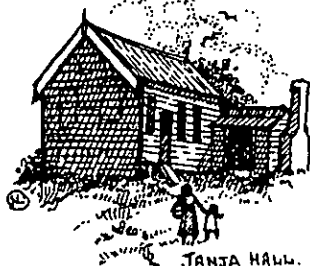
Timing:

The Council notes that the urgency of this work has already been recognised by the Standing Committee on Forestry. This will overcome any present unnecessary or potential duplication of research effort and ensure resources are directed to highest priority projects.

The cost of improved research review processes will be minimal because existing organisational structures, principally by the Standing Committee on Forestry, are adequate to ensure most goals are reached.



9861 AON 20



THE TATHRA WHARF is unique, being the last piece of coastal architecture of its kind. Construction of this deep-sea wharf started in 1860 and the basic structure was enlarged a number of times between then and 1910 when the two-storey warehouse was built. This last remaining link with the era of sailing boats and steamships was vital to the development of the whole region. Roads being almost non-existent at that time, supplies were shipped in and the district's produce, timber, leather and gold from the Tanja diggings, was shipped out through the wharf. At Tanja stands the area's oldest public hall. Built of local spotted gum weatherboard at the turn of the century, it is still in regular use and well kept by a heritage-conscious community. Tathra Wharf was classified by the National Trust and in 1978 it was entered in the register of the National Estate by the Australian Heritage Commission.

22 FRANKS HILL'S DNE
TATHRA 2550
4/11/86

Dear NCC,

Enclosed cheque for £10 as
contribution to your costs
of sending material on
ownership, burning etc.

(Ref. today's phone call to
Young Lady in office).

Great success in your work.

Kind regards
Betty Thatchell

Jocelyn

4/11/86

BETTY THATCHER,
32 FRANCIS HOLLIS DR,
TATHRA 2550

Would like to be put on mailing
~~list~~ list for esp. WOODCHIPPING but
also Hazard Reduction Burning.
Is involved with a Wildlife Refuge
down there & can compare effects
of operations with what's happening
in Refuge. Is going to send a
donation

21st November, 1986

Ms Betty Thatcher,
32 Francis Hollis Dr.,
Tathra. N.S.W. 2550

Dear Betty,

Thank you very much for your donation and best wishes. The latest woodchipping leaflet has just appeared (entitled "The South East. Let's save the forest ... and the jobs!") so I delayed sending you the material until I could include this in the bundle. I have also included a copy of the previous leaflet, entitled "The South East: Forests not Woodchips", and one produced on the Victorian scene by the East Gippsland Coalition. You may also find the copy of the N.C.C.'s Forest Policy ^{helpful} - it contains an combined form many of our positive policies for the wise use of Australia's forests and woodlands, and can be used to counter the arguments of people who try to say that conservationists are against forestry, or have only negative policies.

Regarding hazard reduction burning, I am enclosing copies of two N.C.C. policy papers which may be helpful, "Fuel Reduction Burning - the Policies of the N.S.W. Voluntary Conservation Movement", and "Urban Bushland Management", which contains some relevant discussion on hazard reduction burning and alternatives. If you have access to scientific journals and papers, we could give you some references to more technical papers you may wish to read. Please let me know if you would like further information of this sort.

Thank you once again for your donation and interest.
Yours sincerely,
Jocelyn Howell. PROJECT OFFICER

P.S. Woodchipping - New South Wales, TEC
available, \$10 + \$1-45 postage.

EX



Nature Conservation Council of N.S.W. - for information

Similar letters also sent to:

Minister for Agriculture and Forestry

Minister for Planning and Environment

22 OCT 1986



C O P Y - for information only

THE ROYAL ZOOLOGICAL SOCIETY OF NEW SOUTH WALES

P.O. BOX 20, MOSMAN, N.S.W., 2088, AUSTRALIA

Telephone: 969-7336

18th October, 1986.

The Hon. Barry Unsworth, M.P.,
Premier of New South Wales,
Parliament House,
Macquarie Street,
Sydney, 2000.

Dear Premier,

The Royal Zoological Society of New South Wales wishes to express its concern about the lack of public commitment by the New South Wales Government on the future direction of woodchipping in the Eden region.

You will be aware that the Society does not involve itself in conservation matters except in circumstances where it has appropriate knowledge or insight. It is therefore as a matter which we regard as of exceptional importance that we make the following observations.

The issue of concern to this Society is the future of the fauna of the region. Firstly from the Society's review of the published literature and Environmental Impact Statements on the adequacy of national parks and nature reserves, it is the Society's view that the decisions dating back to the 1960s allocating land for park and reserves recommending dedication of new areas must be heeded because of the magnitude of the current changes wrought by woodchipping. Secondly, the Society's review of the available material on the subject of the future of fauna in forests to be logged shows that the current plan of management in respect to wildlife is quite inadequate. A detailed revision of the wildlife management procedures of the plan need to be published and available for public criticism.

To assist in bringing both these matters into the public area, the Society submits that the Forestry Commission of New South Wales should prepare an Environmental Impact Survey under the Environmental Planning and Assessment Act. The Society feels that it could contribute by making a submission to comment on such an Environmental Impact Survey.

The Society looks forward to your reply on these matters.

Yours faithfully,

Michael L. Augée
President



NEW SOUTH WALES
MINISTER FOR PLANNING AND ENVIRONMENT

13 OCT 1986

Ms. Judy Messer
Chairperson
Nature Conservation Council of N.S.W.
Level 1, 55-57 Wentworth Avenue
SURRY HILLS NSW 2010

20 OCT 1986

Dear Ms Messer

4/8/86

Thank you for your recent letter concerning woodchipping operations in south eastern New South Wales.

I have carefully noted your comments and have referred a copy to the Director of National Parks and Wildlife so that he is aware of your views. As you may be aware, the National Parks and Wildlife Service recently presented a detailed submission to Government on the Harris Daishowa (Australia) Pty. Ltd. draft Environmental Impact Statement. The Service's submission formed part of the basis of the New South Wales Government's submission to the Commonwealth Government.

You may be interested to know that following the recent public review of the draft Environmental Impact Statement, the Minister for Primary Industry requested the New South Wales Government to provide more detailed information in relation to matters of forest management, and more specifically those aspects coming within the responsibilities of the Forestry Commission of New South Wales. The Forestry Commission has prepared a public report containing this information to supplement the details given by Harris Daishowa in the draft Environmental Impact Statement.

This Supplementary Information Report is currently on public exhibition until 10th November, 1986. The report may be viewed at the Environment Centre, 57 Wentworth Street, Surry Hills, the State Library, Macquarie Street, Sydney and also various Town Libraries within the Bega Valley Shire.

Thank you for your interest.

Yours sincerely,

BOB CARR.

Eden Campaign

14 OCT 1986

Time Frame For Lobbying Nov./Dec.Brochure

A new colour brochure should be printed week 3 in October. Brochure and covering letter urging NSW conservationists to write letters and join deputations to see pollies in marginal state and some Federal electorates.

Mailout to ACF, TWS, NPA, FOE, Greenpeace, Fund for Animals, and possibly National Trust, CASERAC

Mailout - week 4 in October.

Letters from all SEFA Groups

Letters to all state pollies will be required from SEFA organisations. Letters to be staggered throughout Nov/Dec. At same time, groups should try to arrange meetings with pollies - after Parliament rises?
Letters to push the line that votes will be on the line over the woodchip issue. (see TEC's example)

Choose your Date!

ACF

17/11/86 → 21/11/86

NCC

24/11 → 28/11/86

NPA

8/12-12/12/86

TWS

10/11/86 → 14/11/86

FUND FOR ANIMALS.

18/12 → 24/12/86

NATIONAL TRUST (?)

GREENPEACE/FOE

13th/12 to 17th/12/86

CASERAC/COSPARC

1st. Week December (tentative - to be confirmed)

Letter Writing Nights

NCC are encouraging all its member societies to run letter writing nights. TWS has run one recently. Other clubs are ringing in to ask for sample letters to run letter write-ins. All groups, if humanly possible, to try for letter writing blitzes.



EDEN WOODCHIPPING - CAN THE UNSWORTH GOVERNMENT KEEP THE SUPPORT
OF THE ENVIRONMENT MOVEMENT?

Dear

Environmental Votes

Each year environmental problems become the focus for public concern around New South Wales. The monorail, urban planning and woodchipping are three current major issues.

Votes have been lost over the monorail and urban planning. In the natural environment area the new Unsworth Government cannot depend on the achievements of the Wran years.

The Eden woodchipping project due for a decision very soon, will be the litmus test for the Unsworth Government - because it is a hard decision and it affects the bulk of eucalypt forests left on the mainland.

The Environmental Challenge

Australia has already lost two thirds of its original forest. Woodchipping involves intensive logging causing significant damage to wildlife, flora, water catchments and wilderness. The regrowth following logging is not an acceptable substitute for the environmental qualities found in our original native forests.

Even the Forestry Commission admits there is "legitimate concern" about some of its protection policies. (HD EIS Supplement, 1986). Our surveys show them to be highly inadequate as are the existing national parks in the region.

Further Australia's economic problems cannot be solved by digging up or woodchipping our remnant natural areas.

The Political Decision

The Unsworth Government must satisfy environmental and economic needs. A decision should include:

- * reservation of new areas as national park, including Tantawangalo and Coolangubra
- * use of less environmentally sensitive material for woodchips
- * maximisation of the economic benefits from woodchips (which may not involve export of the raw material)
- * economic assistance to the region, especially for the tourist and eucalypt plantation sectors

Such a decision would help distinguish Labor from the Liberal-National Party Opposition.

Your support to Barrie Unsworth, Bob Carr and Jack Hallam for a decision that has environmental and economic benefits would be greatly appreciated.

Yours faithfully,

Jeff Angel
Assistant Director
8th October, 1986

Loceby

MEDIA RELEASE

October, 20, 1986. South East Forest Alliance

3 NOV 1986

- EDEN WOODCHIPPING -

CONSERVATIONISTS SET SIGHTS ON MARGINAL ELECTORATES

NEW TIMBER REPORT OFFERS SOLUTION

Conservationists today announced that the campaign to save the forests of Australia's South East from woodchipping would be expanded into marginal NSW state and federal electorates.

At the same time, a new report entitled "Forests and Jobs In Eden" has recommended a strategy where national parks, lower intensity logging and local timber industry development can protect jobs and environmental values.

EDEN-MONARO - A PRIME TARGET

At a meeting in Canberra major conservation groups targetted several marginal seats.

"A prime target is Eden-Monaro which contains the woodchip operation, but includes many conservationists. Federal Labor won this seat on the Franklin Dam votes. Keeping these and other votes will depend on gazetting the proposed national parks and protecting old growth forest from woodchipping" said spokesperson, Mr Jeff Angel.

"After the Kakadu and French uranium debacle Federal Labor support from the environment movement is hanging by a slender thread. Two of the areas threatened by woodchipping - Tantawangalo and Coolangubra - have been listed on the Interim Register of the National Estate. A decision to log these would incur grave political risks." he said.

"We are beginning to organise a campaign committee to letterbox the Eden-Monaro Electorate, hold public meetings, especially in Queanbeyan and possibly stand a candidate in the next election. Support for the Labor member, Jim Snow is already melting away, including long standing Labor Party members."

"There are votes in saving our remnant native forests and adopting sensible long term solutions. Marginal seats held by both the NSW State and Federal Governments would benefit through retaining the support within the environment movement."

BOTH JOBS AND THE FOREST CAN BE PROTECTED.

An economic study of the Eden timber industry has found that national parks, lower intensity logging and local timber industry development, can protect forest industry jobs, in the South East.

It also reveals that if present Forestry Commission plans are followed, there will be a massive drop in employment and hardwood production.

"The South East forestry industry is not, at present, based on sustained yield. The new report proposes a better future for the South East, with a stable and sustainable production of sawlogs from a low environmental impact harvesting system; use of sawmill and sawlog wastes and thinnings and local processing of eucalypt and pine pulpwood." said Jeff Angel. "New national parks and low impact harvesting will also protect important tourist assets."

"The study, which was funded by the National Estate program comes at a time when government is searching for a sensible solution to the woodchip conflict. Adoption of the report's recommendations will allow the State and Federal Governments to resolve an increasingly difficult political situation." he said.

FURTHER INFORMATION:

Jeff Angel, 062-498870 (Sunday)
02-272523 (Monday)

**POLICY ON THE SOUTH EAST FOREST REGION TO PROTECT LONG TERM
EMPLOYMENT AND THE ENVIRONMENT.**

FINAL DRAFT October 29, 1986.

- ① Woodchipping, uses intensive logging and burning that removes most vegetation. This causes soil erosion, destruction of wildlife, wilderness and loss of water catchment values; and requires an environmentally destructive fire management policy to reduce the fire risk from and to regrowth.

Government should recognise that old growth native forest ecosystems are rare and endangered. They have important values not reproduced in regrowth and plantation forests which are the result of significant human disturbance.

Appropriate protection of old growth forest should occur after a full inventory of biological and cultural values.

- ② Several areas in the south east require immediate protection as national parks and nature reserves, including:

- Tantawangalo
- Coolangubra
- Cathcart
- Upper Merrica River

Egan Peaks Nature Reserve and Mt Imlay National Park extensions — in later NWS

Submission on EIS.

There is strong evidence that existing national parks west of the Princess Highway are inadequate for the long term protection of wildlife and do not securely represent the region's flora. In addition, there are legitimate concerns about the long term viability of habitat trees and forestry protection corridors.

- ③ Native forests available for timber production should not be turned over to woodchipping but logged for sawlogs on a low impact plan, to reduce environmental problems and ensure long term stable yields. Strict environmental safeguards should be enforced.

Low impact machinery should be used and the least environmentally sensitive areas logged first, to allow a continuing review of nature conservation needs and further protection as research indicates.

- ④ The current south east timber strategy of the NSW Forestry Commission and the timber industry will lead to the loss of several hundred jobs and falling hardwood production for at least the next forty years. This is due to overcutting and the use of machines to replace jobs. The strategy should be modified to enable jobs and the environment to be protected.

- ⑤ A sustainable timber industry in the Eden region should be sawlog driven, on an average 115 year cycle and retain 70% of the canopy, (existing at the time of logging) on public land. Sources for sawlogs and woodchips include:

- pine sawlogs from the Bombala Plantations used initially to compensate for the cuts in hardwood quotas required to achieve long term sustained yields
- establishment of eucalypt plantations
- hardwood sawmill waste / logging residues thinnings and pine thinnings

Private land should be logged at a lower than currently proposed intensity to allow the establishment of agro-forestry to supply a sustained yield of sawlogs and grazing land.

Woodchips should not be made available from clearcutting operations in Victoria.

The removal of thinnings will stimulate sawlog growth in the pine and hardwood forests. The taking of hardwood thinnings should require an environmental impact statement, as the available areas have already been clearcut once and require care to prevent further environmental degradation.

The size and type of woodchip resource is suitable for local processing to maximise employment and economic benefits.

- ⑥ There should be development of tourist facilities near the new parks and economic stimulation of local towns to further attract both the retirement and young family migrants.

- ⑦ The Forestry Commission of NSW should be reformed to improve its public accountability and environmental responsibility. This would reduce the polarised nature of the forestry debate and enhance the political stability of resource allocation decisions.

Reforms are recommended to ensure:

- ✓ - formal public involvement in management plans
- ✓ - third party enforcement of forest practises regulations
- ✓ - a community based Forests Advisory Council responsible to the Minister
- strict environmental controls on the logging of private land

- ⑧ Bushworkers should be paid award rates instead of piece-rates or subcontract basis to improve employment conditions, safety and the implementation of environmental safeguards. The current system favours productivity to the disadvantage of non-timber producing activities such as environment protection.

No specific
NCC policy

Ask Jeff?

Also - any proposals
for alteration?

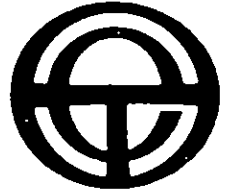
who worked
out 115 yrs?
Worked out after
SEFA mtg, +
Keith Tardo
Subsequently
worked up the
figures.

who is
responsible?
Refers back to
need for continuing
research.

not in NCC policy

No NCC policy.

TOTAL ENVIRONMENT CENTRE
18 Argyle St., Sydney, N.S.W. 2000. Phone 27 4714



4th December, 1986.

08 DEC 1986

SOUTH EAST FOREST ALLIANCE -
POLICY

Please find enclosed the final draft of the Policy we have been discussing for several months. In order to release it publicly, we need to officially endorse it.

We could, alternatively, decide not to release it, although I think most of it exists in small pieces in the public arena already.

Could your Group please consider the Policy and provide a written response by the second week of January, 1987?

Jeff Angel.

NATURE CONSERVATION COUNCIL OF NEW SOUTH WALES

176 Cumberland Street
SYDNEY NSW 2000

18 December, 1986

Mr Jeff Angel,
C/- South East Forest Alliance,
Total Environment Centre,
18 Argyle Street
SYDNEY NSW 2000

Dear Jeff,

re: South East Forest Alliance Policy

In response to your letter of 4th December, I can report that S.E.F.A.'s statement, "Policy on the South East Forest Region to Protect Long Term Employment and the Environment", dated 29th October, 1986, was ratified by the Nature Conservation Council of N.S.W. at the meeting of its Executive on Friday, 12th December, 1986.

There is thus no impediment to including N.C.C. of N.S.W. endorsement in publicity associated with the release of the S.E.F.A. policy.

I am enclosing with this letter several copies of N.C.C.'s Forest Policy (September 1986), to make up for the ones which went astray prior to the October SEFA meeting.

Yours sincerely

Jocelyn Howell
PROJECT OFFICER

Encl.

THE SOUTH EAST: FORESTS NOT WOODCHIPS

13 NOV 1986
South East Forest Alliance
c/ Total Environment Centre
18 Argyle St. Sydney. 2000
November 1986.

Dear friends,

A decision on whether to woodchip the South East forests is near.

The Federal Government is about to receive the final environmental impact statement from Harris-Daishowa. There is intense pressure to allow woodchipping to go ahead, including the destruction of the proposed Tantawangalo and Coolangubra National Parks.

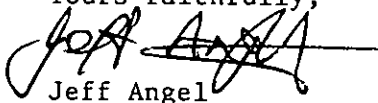
However, the State and Federal Governments have been presented with proposals from the conservation movement that will protect jobs; the proposed national parks and stop clearfelling of other native forest. The enclosed brochure outlines the plan.

We need to put maximum pressure on the politicians in the next few months. Your group can help save our forest heritage by:

- * sending a letter to your local Member of Parliament and relevant Ministers, pointing to the economic alternatives
- * urging your members to write
- * distributing the brochure in your next mail-out (ring or write us for further copies)

This is the last chance for the South East.

Yours faithfully,



Jeff Angel

Convenor

South East Forest Alliance.

21 November, 1986

Mr J.H. Snow,
Member for Eden-Monaro,
2nd Floor,
STCC Building,
34 Lowe Street,
QUEANBEYAN NSW 2620

Dear Mr Snow,

re: Eden Woodchip Issue

The Nature Conservation Council of New South Wales would like to acquaint you with its concerns regarding the proposed renewal of the export licence for woodchips from the Eden region by Harris-Daishowa (Australia) Pty Ltd.

As you may be aware, the Nature Conservation Council of New South Wales comprises 78 conservation and scientific organisations, with a total membership of approximately 140,000 throughout the state, including many in your electorate. Council has had a long-standing concern for the conservation and wise use of the nation's forests and woodlands, and has recently combined its many positive policies towards this aim into a Forest Policy paper. We enclose a copy for your information, and feel sure you will appreciate the positive recommendations of conservationists which it contains.

The current proposal by Harris-Daishowa (Australia) Pty Ltd to continue its export woodchipping operations from Eden causes considerable concern to this Council and its member societies. Our overriding concern is that native forest ecosystems will be destroyed, without being adequately represented in biologically viable conservation reserves, as part of a non-sustainable timber extraction operation.

It is the considered opinion of research scientists with expertise in wildlife studies that the existing National Parks and Nature Reserves are inadequate by themselves to ensure the long-term survival of the Eden region's wildlife. There are inherent, unresolvable conflicts between woodchipping operations which include near or complete clearfelling (as part of "integrated bogging" operations) and wildlife conservation. Clearfelling on an alternate coupe basis causes large-scale destruction of wildlife habitat and food resource.

Many animals need as homes, the hollows which only mature trees older than 100 years can provide. Also, large amounts of the food of many species is destroyed when the bulk of the tree canopy is removed by clearfelling. The range of plant species and sizes needed by wildlife for food and shelter is very likely to be reduced by post-logging fires and hazard reduction burning.

These concerns, along with a number of others, are discussed in more detail in our submissions on the Environmental Impact Statement by Harris-Daishowa (Australia) Pty Ltd, and the Supplementary Document by the Forestry Commission of New South Wales. As you will see in the copies of these submissions which we enclose for your information, it is of particular concern to conservationists that the sustainability of the operation proposed by Harris-Daishowa has not been demonstrated. This has disturbing implications for the region's future employment in the timber industry.

A proposal which combines use of the region's timber in an environmentally acceptable and sustainable way, with prospects for continuing employment, has been researched by the South Eastern Forest Alliance. This proposal makes use of plantation pines as contributions to the sawlog and woodchip resource, and urges the establishment of eucalypt plantations on already-cleared land. Future hardwood resource, together with much employment, would be generated by the establishment of hardwood plantations; these have been given insufficient consideration by the Forestry Commission.

Details of this proposal are contained as "Approach 3" in the paper "Forests and Jobs in Eden", by Keith Tarlo, published by the Total Environment Centre, Sydney, October 1986. We understand a copy of this paper is being forwarded to you, but would be happy to forward further details of the proposal if you do not receive the paper in time for your consideration along with this letter.

Council believes a proposal which combines environmentally acceptable use of timber in a way which assures future employment will be of great interest to you, and recommends "Approach 3" for your support. This proposal accords with the Nature Conservation Council's Forest Policy, which we commend to you.

Yours sincerely

Judy Messer
CHAIRPERSON

Encls.



Minister for Agriculture and Minister for Lands
New South Wales

15 DEC 1986

5 DEC 1986

Ms. Judy Messer,
Chairperson,
Nature Conservation Council of N.S.W.,
Level 1,
55-57 Wentworth Avenue,
SURRY HILLS. N.S.W. 2010 02.

Dear Ms. Messer,

Eden Woodchip Issue

October

Thank you for your letter of 22nd ~~September~~, 1986, and the copy of Council's Forest Policy.

As you are aware, Harris-Daishowa (Australia) Pty. Ltd. has recently prepared for the Commonwealth Government, a Draft Environmental Impact Statement with respect to the renewal of their woodchip export licence, pursuant to the provisions of the (Commonwealth) Environment Protection (Impact of Proposals) Act, 1974.

The Commonwealth Government nominated the company to prepare the Draft E.I.S. and has recognised certain inadequacies in the document, especially, as you correctly point out, it is the Forestry Commission, and not the company, which has responsibility for forest management on dedicated State Forest in the area. The Commonwealth has therefore requested additional information from the New South Wales Government.

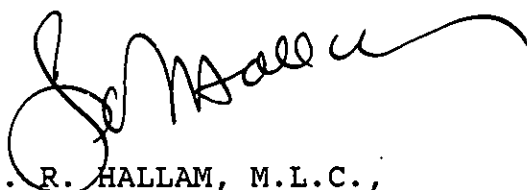
Following consultation with my colleague, the Minister for Planning and Environment, the Forestry Commission of New South Wales has been directed to prepare a complementary Draft E.I.S. under the provisions of the Commonwealth Act, which will satisfy the needs of the Commonwealth Minister and which will be in conformity with State requirements as notified by the Director of the Department of Planning and Environment.

The document has now been completed and was placed on display by the Commonwealth Government until the 10th November. I note the concern of the conservation movement generally to have the opportunity to make public submission on the document and this opportunity was available. A decision on the renewal of the export licence will not be made until this procedure has been completed, public submissions considered and a final E.I.S. prepared and submitted to the Commonwealth Government.

The objective in following through this procedure is to ensure that the requirements of both Governments are met and in a way that does not involve unnecessary duplication, inordinate delays or wasteful expenditure, while at the same time ensuring that the Draft Environmental Impact Study by the Forestry Commission is placed on public display. This would appear to meet the wishes of your Council.

Your interest in this matter is appreciated.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. R. Hallam', with a long, sweeping horizontal flourish extending to the right.

J. R. HALLAM, M.L.C.,
Minister for Forests.



Minister for Agriculture and Minister for Lands
New South Wales

15 DEC 1986

5 DEC 1986

Ms. Judy Messer,
Chairperson,
Nature Conservation Council of N.S.W.,
Level 1,
55-57 Wentworth Avenue,
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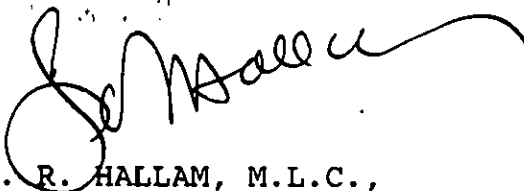
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Your interest in this matter is appreciated.

Yours sincerely,



J. R. HALLAM, M.L.C.,
Minister for Forests.

22 October, 1986

The Hon. R.J. Carr, M.P.,
Minister for Planning and Environment,
10th Floor,
139 Macquarie Street,
SYDNEY NSW 2000

Dear Mr Carr,

re: Forest Policy and Woodchipping in the South East

The Nature Conservation Council of New South Wales has pleasure in forwarding you a copy of its Forest Policy. This document draws together Council's many positive policies for the conservation and wise use of the state's forests and woodlands into one statement.

We would like to draw your attention particularly to Council's policy on woodchipping. Many of the adverse effects of "integrated" logging involving near or complete clearfelling are exemplified in the Eden woodchip proposal by Harris-Daishowa (Australia) Pty Ltd. Council's submission on the Environmental Impact Statement by Harris-Daishowa, a copy of which was forwarded to you on 4th August, contained details on the adverse impacts of the woodchipping operation, particularly on wildlife habitats and the long-term survival of the region's flora and fauna. Thank you for your letter of 13th October in reply to our letter accompanying our submission on the E.I.S.

Council notes that the Commission of Inquiry foreshadowed by the Premier's office on 15th July 1986, has not been forthcoming, and that in fact there is still no opportunity for public assessment of the management operations of the Forestry Commission of N.S.W. under Part V of the Environmental Planning and Assessment Act. Council believes the E.I.S. Supplementary Document released recently under federal legislation is not an adequate substitute for consideration under state legislation.

Council therefore renews its request for public assessment under state legislation, via an Environmental Impact Statement with the Forestry Commission as joint proponent and has also conveyed this request to the Minister for Agriculture and Lands, the Hon. J.R. Hallam.

As noted at the recent meeting with the Premier, there is also an urgent need for the implementation of a formal consultative mechanism, i.e., a Forestry Advisory Council. The NCC would appreciate your support for this measure.

Yours sincerely

Judy Messer
CHAIRPERSON

Encl.

Copy N.C.C.

30 JUL 1986



PORT STEPHENS CONSERVATION SOCIETY
PO BOX 281 NELSON BAY 2315

July 29, 1986

The Secretary,
Department of Arts, Heritage & Environment,
G.P.O. Box 1252,
CANBERRA. 2601

Attention: Mrs. A.M. White

Harris Daishowa Woodchip E.I.S.

Our initial concern is that the E.I.S. review period be extended to 3 months, having in mind that its preparation has involved 18 months, and that it covers an area of approximately 200,00 hectares over a period of 20 years.

We consider that failure to grant such a minimal concession would not be compatible with a serious government concern to facilitate and evaluate maximum public input.

We wish to make the following further submissions.

The significance of the E.I.S. for evaluation purposes is substantially nullified because it does not embrace the major role in forestry operations coming under the control of the Forestry Commission of N.S.W.

We therefore submit that before an adequate environmental assessment of the impact of the Japanese woodchipping operation can be made, the Forestry Commission of N.S.W. must submit an E.I.S. as a joint proponent under Part V of the N.S.W. Planning and Assessment Act.

Finally we submit that this project negates a priority guideline for decision-making by any responsible contemporary government involving the usage of a renewable resource, viz: adherence to the principle of "sustainable yield" as laid down in the World Conservation Strategy, to which the government claims to subscribe.

We consider that overriding the admitted pressure and magnitude of current economic difficulties, governments must acknowledge that a basic human survival requirement is the ongoing viability of the natural environment of the planet.

Consequently, provided we manage to avert the threat of nuclear annihilation, human survival will depend upon our capacity to learn to achieve harmonious cohabitation of the human and natural environments.

...2

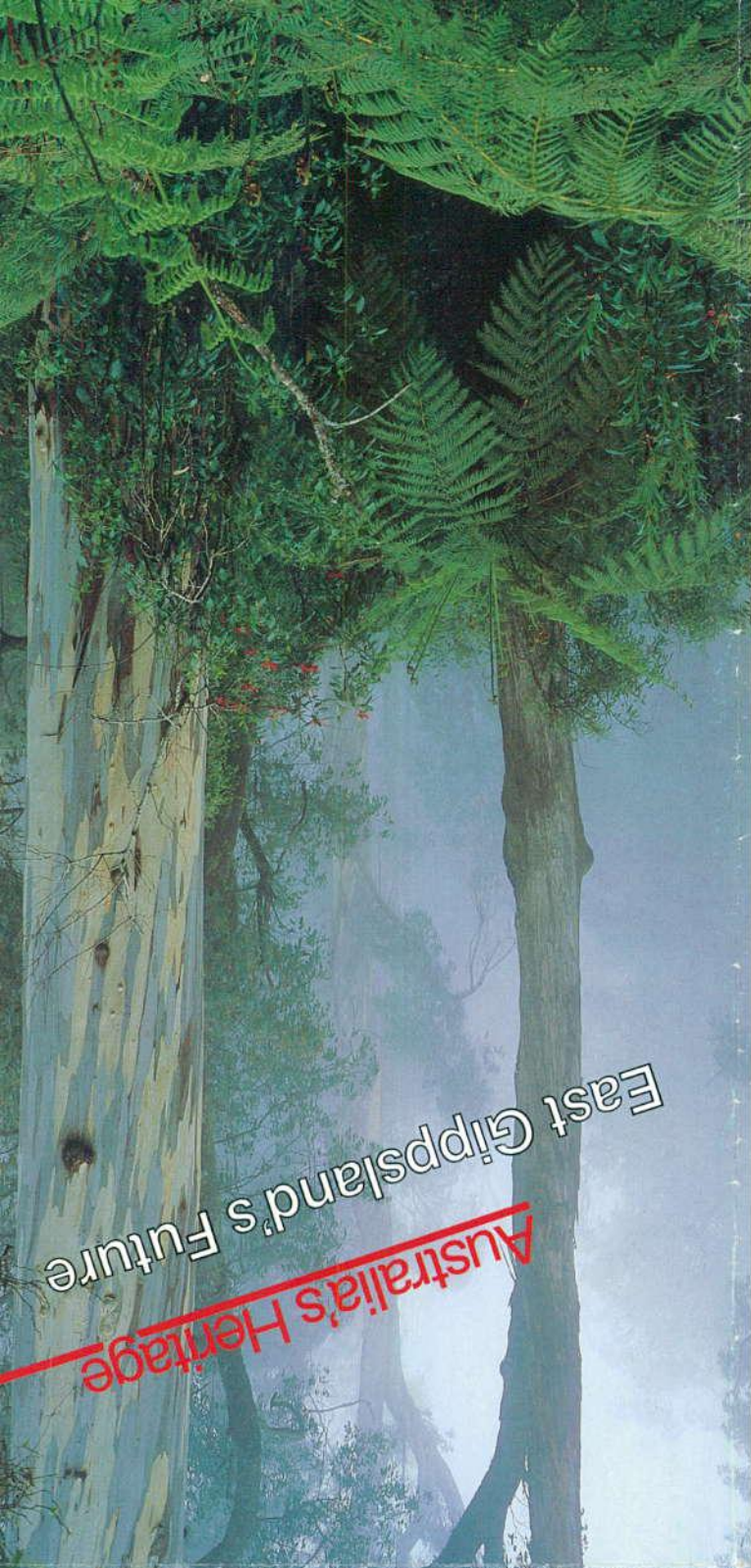
The damage done to the natural environment of our continent during the 200 years of white settlement (a moment of geological time) is beyond calculation.

However, decisions of recent and contemporary governments have initiated a significant pattern of harmonious cohabitation.

We trust that this pattern will not be damaged by a decision on this issue.



G.R. ANDERSON
Executive Officer



Why new National Parks in East Gippsland?

East Gippsland is Victoria's forgotten corner. Its forests are wild and beautiful. They are a haven for rare plants and animals.

It is as delicate as Daintree and as powerful and captivating as the Franklin. Magnificent and irreplaceable areas in East Gippsland now face destruction through logging. Your support is needed to save our diminishing natural heritage. The Victorian Land Conservation Council (LCC) has recently reviewed land use in East Gippsland. Its draft recommendations are now open for public comment.

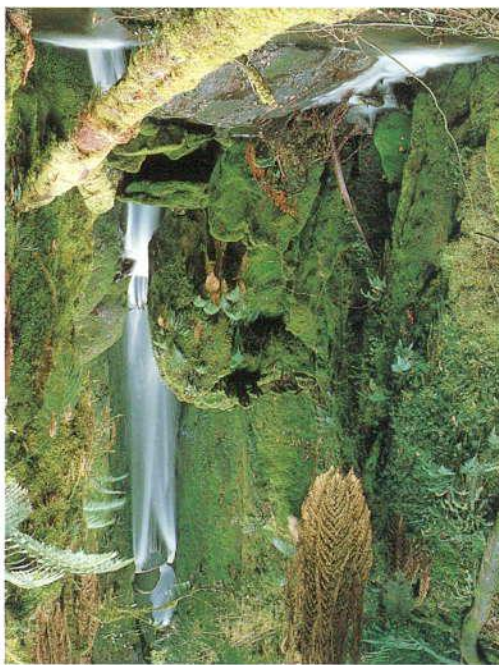
A coalition of Victoria's major conservation groups has proposed that all areas of scientific and environmental significance be preserved in National Parks. Some of these areas have been included in the LCC's recommendations for new Parks. However, there are also major and disturbing exclusions.

Those areas which must be protected are:

- **the Rodger River Wilderness.** Incorporating Gelantipy Plateau and the Bowen Range, and bordering the Snowy River National Park, this is Victoria's last great forest wilderness.

The VNPA is a member of the East Gippsland Coalition, which also includes:

- Australian Conservation Foundation
- Conservation Council of Victoria
- Native Forests Action Council
- The Wilderness Society



For further information, contact:
 Victorian National Parks Association
 285 Little Lonsdale St, Melbourne 3000
 Tel: 663 2091
 East Gippsland Coalition
 285 Little Lonsdale St, Melbourne 3000
 Tel: 663 1561

Donations of time and money for this campaign are gratefully received!
 Enclosed is a cheque or charge Bankcard no.

Name
 Address
 Code
 Signature

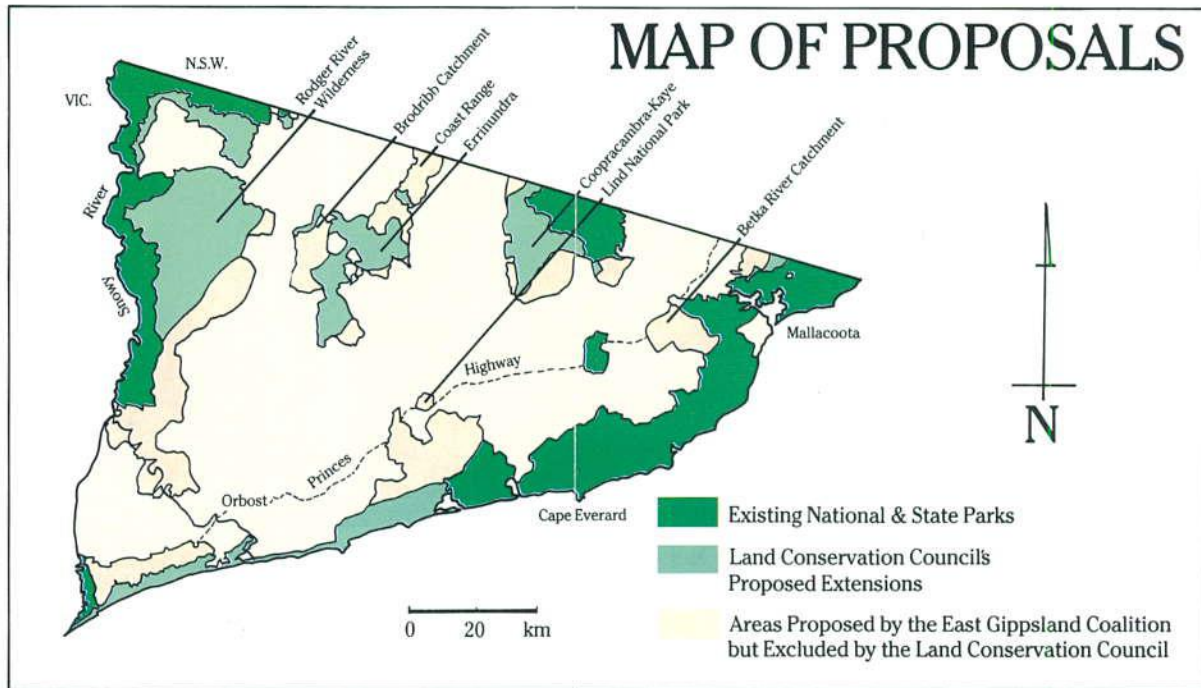
Ten minutes of your time may save these forests

- Stands of Mountain Ash from Shakespeare's day
- Magnificent Wilderness areas
- Ancient rainforests
- Untouched rivers and streams
- Habitat for many gliders, the long-footed Potoroo, the Tiger Quoll, rare bats and owls.

Please do two things:

1. Write to the Land Conservation Council, 464 St Kilda Rd., Melbourne, 3004.
 2. Write to your local Members of Parliament, or send them a copy of your submission. It is vital that they know your views. (Ring us if you don't know who they are!)
- Your submission need only be a few sentences long. Your response will help ensure that our heritage is preserved, intact, in National Parks. The LCC's recommendations are open for public comment until July 15th, 1986.
- The LCC's recommendations are open for public comment until July 15th, 1986.
- support its recommendations for National Parks, especially
 - the Rodger River Wilderness, and
 - the Errinundra Plateau
- underline the need to preserve all areas proposed by the East Gippsland Coalition. Of special importance are:
 - Coast Range
 - Brodribb catchment
 - Betka River catchment
- support the retention of Lind as a National Park.
- emphasize the need to exclude woodchipping from the forests of East Gippsland.
- Above all, point out that old forests are now rare in the world. Such priceless treasures as we still possess should be retained for the future appreciation and inspiration of all Australians.

MAP OF PROPOSALS



These forests are remarkably diverse. Many distinct vegetation communities co-exist here, including ancient mountain ash forests characterised by an unusual multi-aged structure. Amongst the tallest hardwood forests in the world, they are a refuge for endangered animals such as the long-footed potoroo and tiger quoll.

Undisturbed stream catchments are rare in Victoria. The Rodger presents an unrivalled opportunity to preserve a pristine catchment and its complex ecosystem. The LCC has recommended that it be made a National Park in its entirety. **This should be strongly supported.**

- **the Errinundra Plateau** bears rainforest and mixed species forests of international importance and exceptional beauty and fragility. No substantial area of the plateau is yet reserved. Partially recommended by the LCC, **it should be saved in its entirety.**

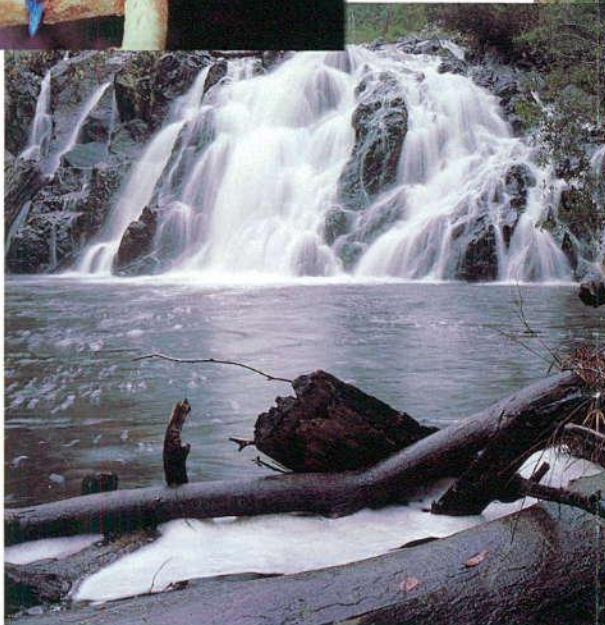
- **the Coast Range** is the northern section of the Errinundra area. It possesses the finest pure stands of Brown Barrel (cut-tail) in Australia. It is a haven for a rich diversity of wildlife, for gliders, owls and other creatures. Overlooked by the LCC, **this area must be preserved in a National Park.**
- **the Brodribb Catchment**, like that of the Rodger River, is another example of a pristine catchment. Nominated for the National Estate Register, it too has been omitted by the LCC. **It should be preserved.**

Other important areas, too, such as the Betka River catchment, are either omitted or inadequately reserved. **They should be protected.**

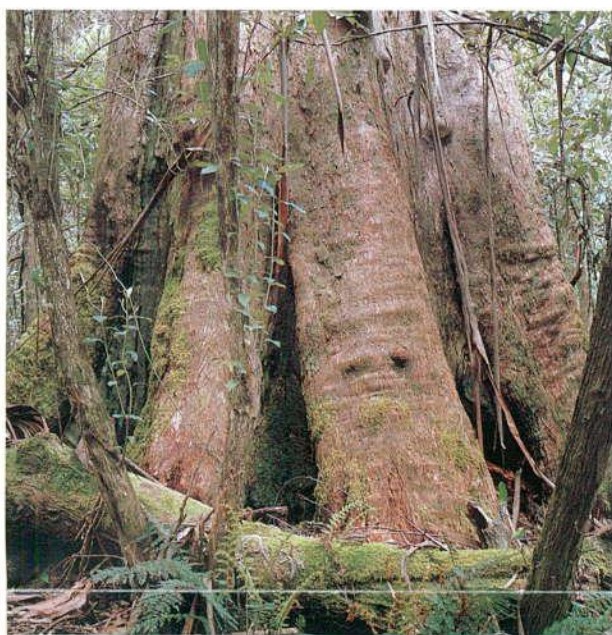
The LCC also recommends that Lind National Park be revoked and in part turned over to logging. This would set a precedent threatening all National Parks in Victoria.



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East Gippsland's future...

For two decades, the timber industry has overcut the region's forests. Now it must drastically reduce its operations if it is to survive at all.

The industry faces the loss of 330 of its 550 jobs through this reduction **irrespective of new National Parks**. Woodchipping is not a viable long-term option for maintaining these jobs.

The regional economy must be diversified.

The recently released report, **Jobs in East Gippsland** shows that East Gippsland's future rests with its forests and its National Parks. Its jobs will be increasingly based on tourism, as well as on a sustainable timber industry and on agriculture.

New National Parks will have a relatively minor impact on timber employment (15%) but will be a source of jobs through tourism and Park management. They will remain an economic resource for centuries.

They will also safeguard our heritage.



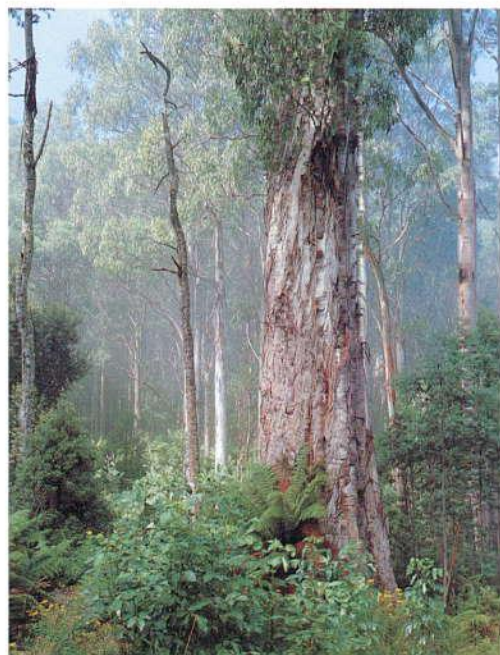
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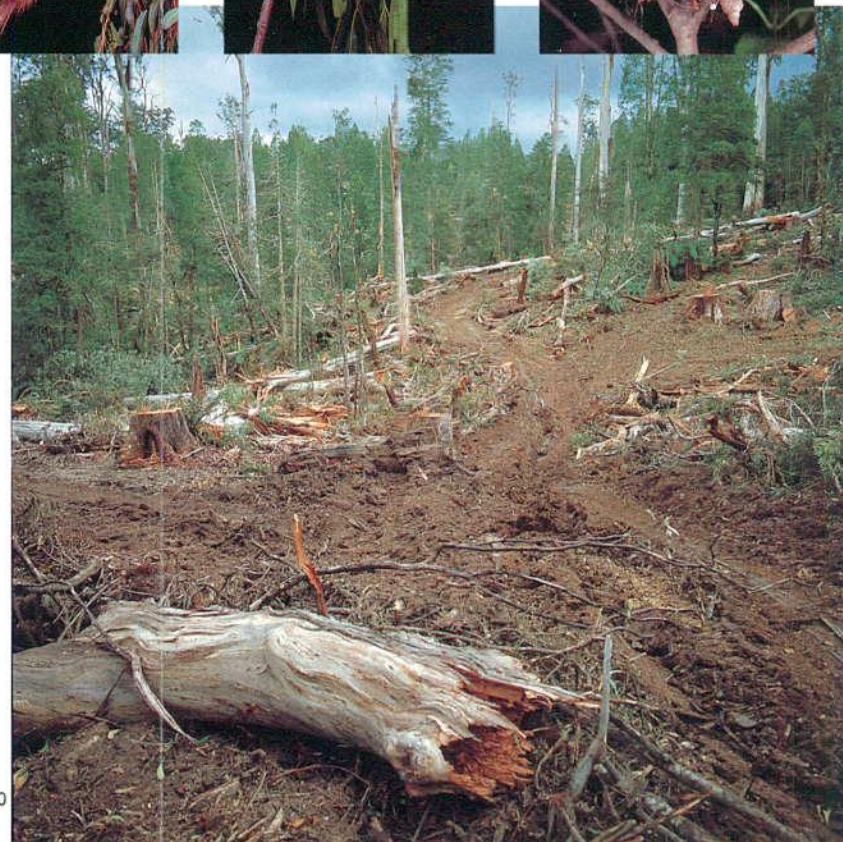
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Cover: Shining Gum near Monkey Top, Rodger River Wilderness. (David Tatnall)

1. Young Greater Glider. Studies show 90% die after felling. (Cyril Webster A.N.T.)

2. Azure Kingfisher. (Cyril Webster A.N.T.)

3. Unnamed falls on the Rodger (David Tatnall)

4. A pristine stream - the Rodger River (David Tatnall)

5. Coast Range (David Tatnall)

6. Tiger Quoll - the only surviving quoll species in Victoria and endangered. (G. B. Baker A.N.T.)

7. Yellow-bellied Glider. (G. B. Baker A.N.T.)

8. Eastern Yellow Robin. (Cyril Webster A.N.T.)

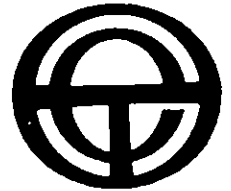
9. Giant Mountain Ash in the heart of the Rodger. (John Renowden)

10. Clearfelling on Errinundra. (Ern Mainka)

11. First Creek Falls, Errinundra. (Ern Mainka)

3 JUL 1986

TOTAL ENVIRONMENT CENTRE
18 Argyle St., Sydney, N.S.W. 2000. Phone 27 4714



2nd July, 1986.

Copies of this letter sent to:
Australian Conservation Foundation,
National Parks Association,
Nature Conservation Council of NSW.

Mr. Tim Moore, MP
Member for Gordon
Parliament house
Macquarie Street
SYDNEY, 2000.

Dear Mr. Moore,

Coolangubra, Tantawangalo and
Cathcart park proposals

According to the Eden Imlay Magnet of 29 May, you addressed a dinner meeting arranged by the Eden branch of the Liberal Party the previous Thursday.

You apparently stated (1) that there is already sufficient land in National Parks in the area without adding more in the Tantawangalo and Coolangubra areas which are at present State forest. Apparently you believe (2) that the two areas are vitally necessary to maintenance of a viable timber industry. You also stated your belief (3) that "the conservationists in their push for more parks have no real expectation of getting all they ask for."

It is surprising that Mr. Greiner, Mr. Ian Armstrong and yourself should each commit the Coalition against additional parks in the region prior to publication of the E.I.S. for the woodchip operation.

Contrary to the proposed park areas being 'vitally necessary' the E.I.S. reports that the woodchip operation is viable without them. The Eden Management Plan shows the sawlog industry is only viable for another 18 years anyway. Withdrawal of Coolangubra and Tantawangalo means a 43% loss of logs so a timber industry would still be viable but on a smaller scale for that period.

The third charge I find rather objectionable. You should be aware that Total Environment Centre wastes neither its expert volunteers' time nor its donors' money on spurious park proposals. Every park proposal we have ever put forward has been genuine. We have achieved or are in the process of achieving each of our proposals.

What I find most disappointing is the willingness of the Coalition to acquiesce in the destruction of a million hectares of forest by a 100% Japanese owned company which is treating us like some sort of colonial possession. It's simply no good trying to persuade the general public that the Coalition is a viable alternative to Labor in the nature conservation field when you have policies like that.

Yours faithfully,


Director

Total Environment Centre.



PARLIAMENT OF NEW SOUTH WALES
LEGISLATIVE ASSEMBLY

22 JUL 1986

The Chairman,
Nature Conservation Council of N.S.W.,
1st Floor,
57 Wentworth Avenue,
SURRY HILLS 2010

OFFICE: First Floor
844 Pacific Highway
Gordon
PHONE: (02) 498 3257
DX: Member's Office
Gordon Electorate
DX 22
Sydney
MAIL: P.O. Box 57
GORDON 2072
New South Wales
Australia

Dear Chairman,

I have received a letter dated the 2nd of July, 1986, from Mr Milo Dunphy, the Director of the Total Environment Centre concerning remarks of mine reported in the "Imlay Magnet" of the 29th of May last. As Mr Dunphy has circulated a copy of his letter to you, I am doing you the courtesy of forwarding a copy of my response.

Yours sincerely,

TIM MOORE, M.P.,
Member for Gordon,
Shadow Minister for the Environment,
Water Boards and Ports.

Encl.

19 July, 1986



PARLIAMENT OF NEW SOUTH WALES
LEGISLATIVE ASSEMBLY

9th July, 1986

Mr Milo Dunphy,
Director,
Total Environment Centre,
18 Argyle Street,
SYDNEY 2000

OFFICE: First Floor
844 Pacific Highway
Gordon
PHONE: (02) 498 3257
DX: Member's Office
Gordon Electorate
DX 22
Sydney
MAIL: P.O. Box 57
GORDON 2072
New South Wales
Australia

Dear Mr Dunphy,

I acknowledge receipt of your letter of the 2nd of July, 1986, headed "Coolangubra, Tantawangalo and Cathcart Park proposals".

The remarks about which you write are, of necessity, only briefly reported in a newspaper article.

I am certainly accurately reported as saying that, should the Commonwealth Government decide to renew the export woodchipping licence after consideration of the Environmental Impact Statement from Harris-Daishawa, then the State Opposition would not support any decision taken by the New South Wales Government which would have the effect of affecting the economic viability of the woodchip and saw log industries on the far south coast of New South Wales.

You take exception to my remark that "the conservationists in their push for more parks have no real expectation of getting all they ask for."

I cannot remember whether the words quoted are precisely those used by me but I see no reason to resile from the sentiment contained in them.

During the course of the evening I was asked a question about the nature of the negotiating process, within the State political framework, of the creation of national parks and other nature conservation and environmental initiatives.

I propose to set out, in some detail, the way I responded to that question in order that the sentiment expressed by me was accurately reported and that it was not said in any pejorative or critical fashion.

What I said was, in fact, in defence of the rights of organisations such as the Total Environment Centre to seek to advocate and obtain change in the area of environmental protection that they considered to be desirable. I said that proposals for new national parks or changes to existing boundaries were genuinely advanced by environmental groups in the hope that they would be adopted by government. I indicated that, contrary to some beliefs, such proposals

were done in a well documented fashion and were supported by an analysis of why the proponent believes that the proposal should be adopted.

I then went on to indicate that, in my view, those proponents had no real expectation of having all that they advocated immediately accepted by government and that, whilst they continued to believe that all proposals should be adopted, what was involved was a gradual and negotiation-based process.

I have never said - did not on that occasion say - and would not say - that such proposals were advanced for purely destructive or vexatious purposes.

What I did say - and will continue to say - is that governments must balance their own priorities and the submissions that are put to them before deciding whether to agree to such submissions as are made to them.

I have also said - and will continue to say - that it is entirely reasonable and desirable that environmental groups continue to press for the unachieved portion of their environmental agenda. That is not only their legitimate role, but, in my view, it is their responsibility to keep pushing for greater public acceptance of proposals for environmental preservation and conservation.

I do not resile from the remarks made by me concerning the south coast and I am, at present, reading the Environmental Impact Statement lodged with the Federal Government by Harris-Daishawa as a basis for that government's consideration of renewal of the woodchip export licence.

Equally, in the context given as outlined above, I do not resile from the other remark to which you objected. It was not an attack or reflection on the integrity of the voluntary conservation movement. As you would be aware, in a number of instances, I have been involved in some of the struggles over the last fifteen years or more. I value my limited involvement and certainly respect - without regard for their political affiliations whether in agreement or disagreement with my own - the contribution of those who have given and continue to give far greater commitment to these causes than I.

Yours sincerely,

TIM MOORE, M.P.,
Member for Gordon,
Shadow Minister for the Environment,
Water Boards and Ports.

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USE for PHOTOCOPYING

DO NOT GIVE AWAY!!

EDEN WOODCHIPPING

A Briefing Paper.

1. Background.

The application by Harris Daishowa (Australia) Pty. Ltd. to renew its export woodchip licence for a further 20 years, beyond 1989, has provided the opportunity for the community to question the value of the industry to both the South East region and Australia.

This process of questioning has brought to light two main issues - the need to provide a stable economic base for the Eden area. and the need to ensure that the natural environment of the region is adequately protected. The export woodchip industry can do neither. It cannot provide the basis for a healthy economy and it threatens environments of great natural beauty as yet unprotected by the national parks system. Industry practices degrade soil and water qualities, destroy vegetation and wildlife, and irreparably damage wilderness values that are so rare throughout the state.

Both the Federal and State Governments are in a position to decide the future of the Eden woodchip industry. Although the Federal Government has responsibility for the issuing of export licences, it has stated they will not be issued unless the N.S.W. Government wants them to be. It must be made clear to the members of State Parliament that the people of N.S.W. are strongly opposed to the export woodchip industry at Eden. Instead, N.S.W. requires environmentally sound development which provides both stable earnings and stable employment.

2. Economics of Eden Woodchipping.

The employment and earnings currently available from woodchipping at Eden cannot be maintained. The resource estimates of Harris Daishowa are not supportable and there are indications that shortfalls will occur in the future. As the industry stands, it provides relatively few jobs, and even fewer with the implementation of labour saving technology.

2.1. Resource Availability.

The e.i.s. uses an area nearly 50 000 ha more than what is actually available to log to estimate the resource availability. Also an error in the calculations of regrowth resource shows an overestimation of some 60 000 tonnes.

2.2. Overcutting of Sawlogs.

The Eden Native Forests Management Plan admits that overcutting has occurred, and states that "it is apparent that sawlog commitments cannot be supplied in full by integrated sawlog/pulpwood logging operations aimed at meeting the pulpwood (woodchip) commitment".

2.3 Employment.

As a capital-intensive industry, woodchipping necessarily employs relatively few people. Although greater amounts of resource have become available to the industry in Australia, as well as in Eden where licences have allowed an extra 400 000 tonnes per year to be exported since 1970, over 22 000 jobs have been lost in the forest industries in the same period. An important factor in these losses has been the increasing utilisation of labour-saving equipment and cuts in sawlog quotas due to overcutting.

2.4 Alternatives.

Alternative means of supplying woodchips include the establishment of hardwood plantations and the use of sawlog waste in combination with thinnings from some regrowth and pine forests. The forest resource could also be used to produce more highly processed timber goods, thus creating a greater number of jobs and greater value than the woodchip industry. Tourism is another valid use of the forest resource and increases in visits to National Parks in N.S.W. - from 13.8 million in 1980-81 to 14.9 million in 1983-84 - suggest that valuable opportunities are being missed in the Eden area.

3. Environmental Impact.

The Eden woodchip proposal threatens not only the natural values of the area as a whole, but forests that have been listed on the Interim Register of the National Estate, Tantawangalo and Coolangubra.

3.1. Wildlife.

Integrated logging, which removes most of the very old trees and 90% of the tree canopy, destroys habitat and food for a large number of species. At least 24 species of tree dwelling mammals and birds require the hollows produced only in old trees for nests and breeding. Nectar-feeding birds such as honeyeaters and lorikeets require the flowering tree canopies of a number of tree species to survive, while the koala needs to forage in tree canopies and is already uncommon in the area. The Forestry Commission leaves wildlife areas but these are very small, open to logging and burnt, quickly becoming degraded. Five trees per 15 ha are left for wildlife in logged areas, compared to 60 per ha in mature unlogged forest.

3.2 Vegetation.

The e.i.s. notes that one of its major deficiencies is that no detailed vegetation

map is available for the Eden management area. The impact on vegetation is therefore largely unknown. But with the intense logging, the risks to flora is great. Research undertaken at the National Herbarium indicates however that there may be many populations of rare and endangered plants in the region.

3.3 Soil.

Removal of large amounts of vegetation facilitates soil erosion and evidence suggests that nutrient losses can be so high that it may take 10 to 20 years before the soil can be restored to its original condition.

3.4 Water.

Hydrological characteristics of the area could be seriously affected by intensive logging. Increased runoff occurs initially as a result of loss of vegetative cover and compaction of the soil by heavy machinery. The failure of the logged area to hold water as long as in a forested area creates problems as there is less water available over a period of time. There are also indications of significant declines in water supply after dense regrowth has become established. Water quality may also be affected by logging, sediment loads increasing as a result of the above-mentioned soil erosion. The far south coast often has water rationing and severe droughts. Farmers, residents and the tourism industry do not need even less water.

3.5 Fire.

In the area of the most significant fire hazard in Australia, woodchipping poses a real threat. Young regrowth forests are more susceptible due to increased wind speeds resulting from the destruction of the canopy.

The increase in leaf cover and twigs along the stem of the tree close to ground level also provides more opportunity for fires to establish themselves.

3.6 Wilderness.

Wilderness has been identified by the Wilderness Working Group in the Coolangubra State Forest. Logging and roading are completely incompatible with wilderness and the establishment of any industry activities in those areas would destroy their wilderness values.

3.7 National Estate Values.

Listed on the Interim Register of the National Estate are the Nunnock Swamp Flora Reserve, Nethercote Falls, Coolangubra Forest Area and the Tantawangalo Creek catchment. Listing on the National Estate requires that the place "has aesthetic, historic, scientific or social significance or other special value for future generations as well as for the present community."

The Coolangubra and Tantawangalo areas have been proposed as National Parks and these proposals are currently under consideration by the State Government.

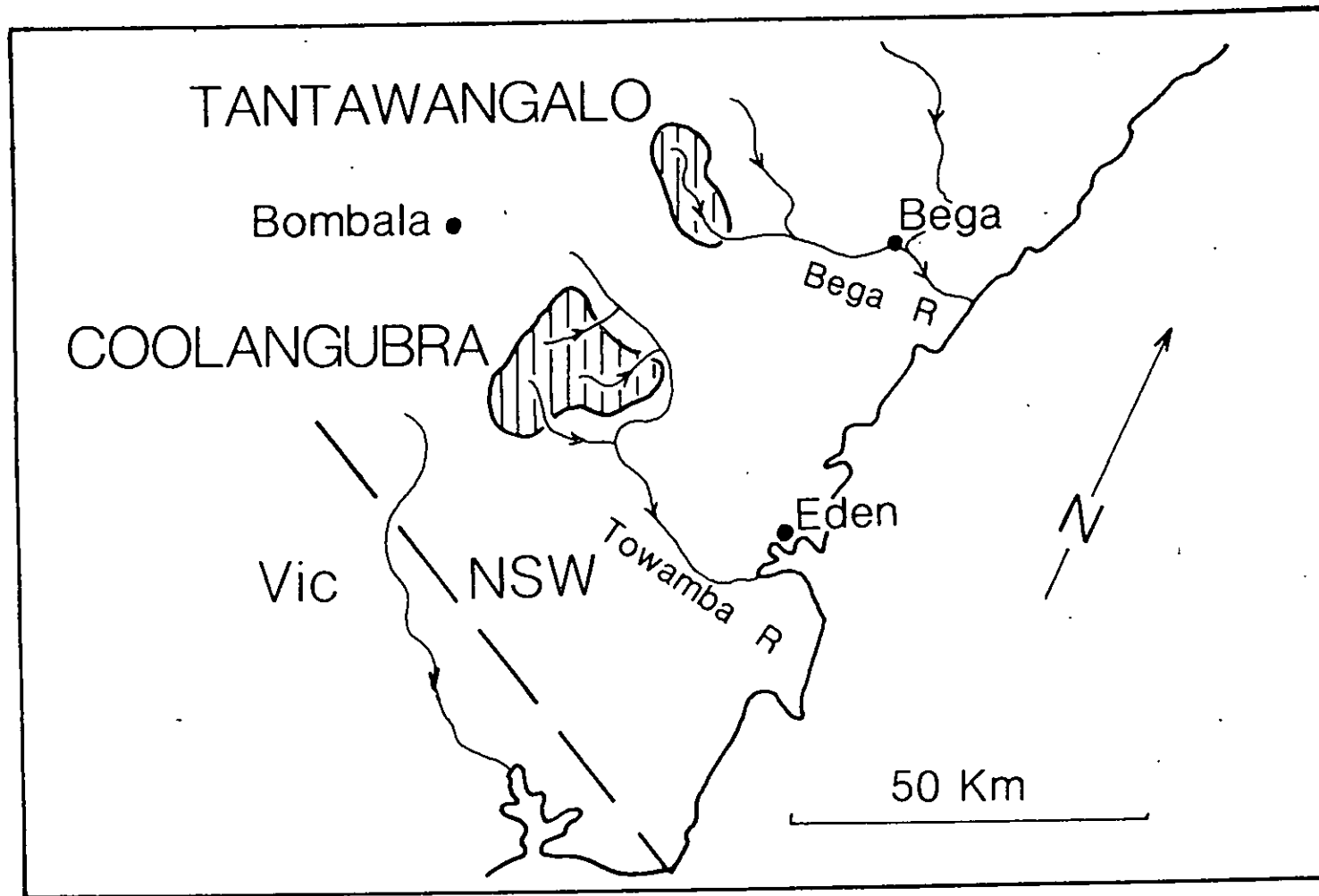
The Coolangubra Forest contains possibly the best arboreal mammal habitat known in Australia, while the Tantawangalo National Park would conserve undisturbed a catchment area vital for the protection of quality of water supply to local towns.

The National Park proposals, if implemented, would provide a very necessary addition to the national park and nature reserve system of the region. They are essential if the diversity of plants and animals in the South East of the state is to be conserved.

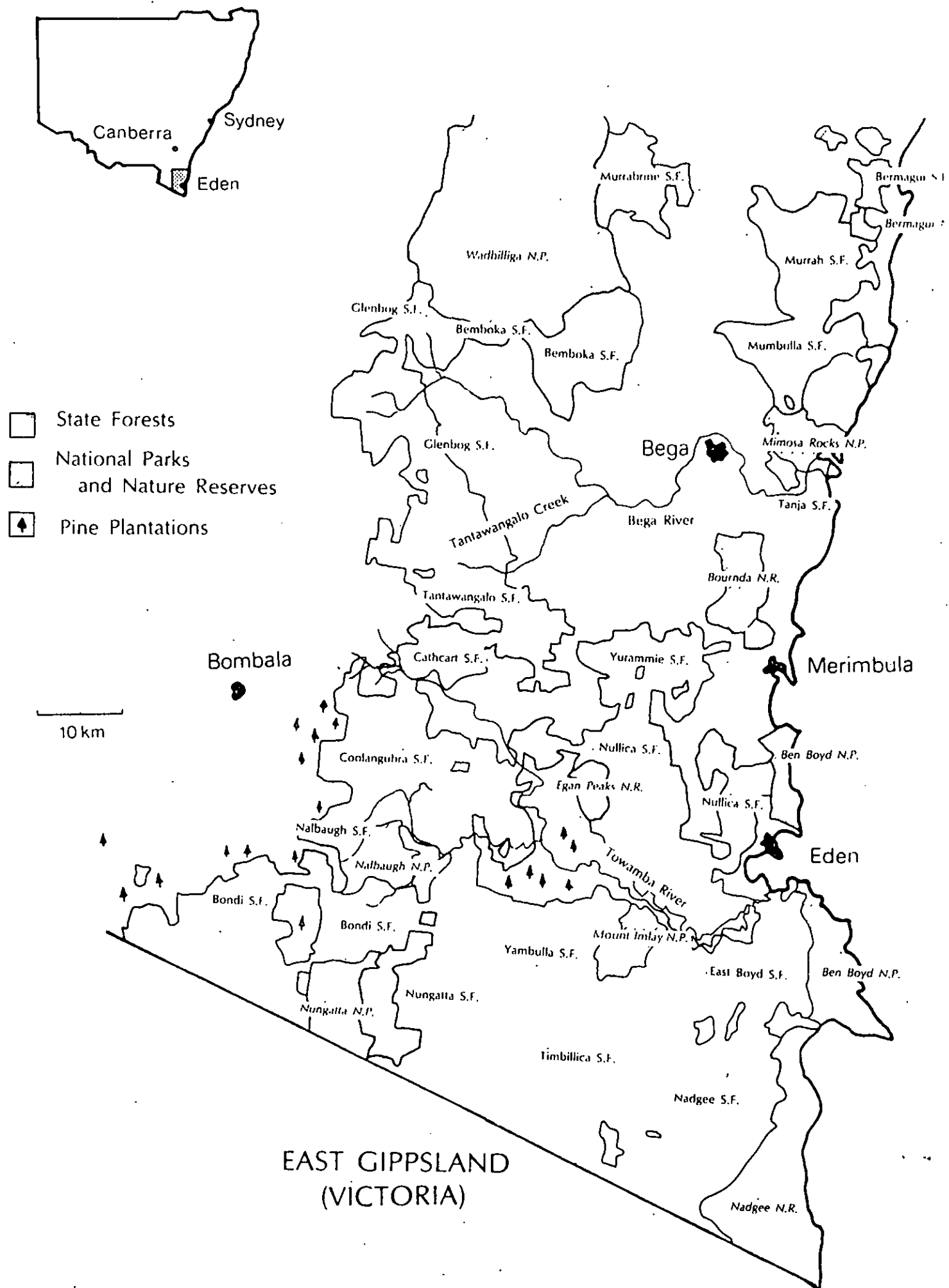
The application to renew export woodchip licences for the Eden area necessitates immediate action by the Government to conserve the region's natural areas.

However, in addition to this, it must be recognised that the industry does not fulfil the need to find development which is environmentally sustainable and economically rational in the long term.

If representative examples of these native forests are to be retained, then our generation must act to protect them.



EDEN (N.S.W.) WOODCHIP CONCESSION AREA



PASPALUM PLACE

By IAN WARDEN

Greenies endangering leeches on Tantawangalo Creek

I SPENT last weekend wading and slithering and climbing in and around Tantawangalo Creek and after we had killed about 100 leeches between us, plucking them from our calves and ankles and squidding them, it crossed my mind that this might be an endangered species of leech and that we might be squidding them to extinction.

Tantawangalo is one of two areas of native forest (the other is Coolangubra) in the Eden-Bega region which are the subject of intense lobbying at present by greenies who want them made into national parks and by loggers (and notably the Harris-Daishowa company with its woodchip mill at Eden) who want to be able to harvest timber there. A decision is nigh.

With some intrepid greenies from the Wilderness Society (one of them a top who brought his shaving cream) I had come to acquaint myself with Tantawangalo and perhaps to see it while it is still worth seeing. Logging, whether or not it is essential for the employment it gives (and this essay avoids that vexed and voluminous subject) changes hitherto untouched places utterly.

Just as artful greenies named a cave on the Franklin after Mr Fraser and (informally) a plant at Jackey's Marsh after Mr Hawke to try to persuade them to defend the places where the cave and the plant are found, it occurred to me that we might be exterminating a species of leech which might well be named after one of the Federal and NSW ministers whose decisions on Tantawangalo's status will be crucial. *Bloodsucker coheniformis* perhaps, or *Vampira unwarthiana*.

The Tantawangalo Creek, which has its origins somewhere near Nimmitabel and which flows southwards and eastwards to eventually join the Bega River and to contribute significantly to the fresh water supplies of various towns and hamlets, is wonderfully inaccessible at the moment and, requiring the negotiation of fire trails and overgrown tracks and then a bash through small jungles, tested the intrepidity and the map-reading skills of our leader.

En route we all but trod on a lustrous brown snake, which, perhaps made sluggish by the cold, unwound itself with graceful reluctance and mooched out of our way. I have seen snakes move with the speed of motorcycles on hot days and have marvelled at how fast they might have been if God had given them legs.

At night we camped on a beach on a bend in the creek and, while our wet socks and boots steamed by the fire and as the pale blue of our feet and legs gave way to a more human hue (we had been forced to wade a lot and the water had been like an appropriately chilled chablis), I lay back and looked up at the stars and wondered about the Meaning of Greeniness.

While we were there, in an environment quite untouched by humans and without a trace of a Cheezels packet or a Foster's can, I realised that as a group we were a quintessential example of those people so often characterised as being selfish because we do not want quiet places linked to the wider world with four-lane highways and equipped with the caravan parks which will enable tens of thousands to see with ease what at the moment can be seen only by dozens with difficulty.

The Forestry Commission and Harris-Daishowa will argue, as they have elsewhere, that the roads which are built or the tracks which are widened to allow the loggers to get at the timber also allow the public to get at the (altered) scenery.

It must be said that there are elitist greenies who hate the common people and their Pajeros and their vulgarity and who think that the wilderness is too good for them. I own up to a soupcon of that attitude and to the occasional strong desire to get out of sight and earshot of ugly people with ugly ideas and ugly pastimes and I have been with groups of greenie bushwalkers turned quite

homicidal by the discovery of trail-bike riders and Pajero drivers in places where the law outlaws them.

There is some snobbery about this, and yet it is my experience that greenie motives are usually more laudable than that and that their interest is



Picture IAN PERKINS

Tantawangalo Creek as it looks for the time being.

not in having places left unmolested so that they personally can visit them to the exclusion of all others, but so that they can enjoy the warm inner glow which comes from the certain knowledge that the plants and creatures there are being left alone to do their own things. I would not need to struggle along the Tantawangalo creek again to feel pleased for the tree ferns, the shining gums, the dragonflies, the fantails and all plants and creatures (even the leeches) great and small in the knowledge that they were unmolested and had all the time they needed to grind on and on in the service of the processes of evolution.

This is a notion which completely baffles those who do not feel it. It is an idea not dreamed of in their philosophy and so they find it hard to credit the sincerity of those who subscribe to it. Perhaps those of us who think this way are equally blinkered. Over the weekend I tried to think like a forester or a logger and to look at the trees of the forest as lumber, as potential planks and woodchips, but failed miserably and could only see living things of great character which seemed to have the right to live on in majesty. Perhaps if my mortgage and the feeding of my children depended on my being employed to set about them with a McCulloch my philosophy would be less cramped.

Tourists would not want to traverse the creek the way we did. Often the only way along the creek was through it in chilly waters which were often waist-deep, or, where it became torrential and turned into waterfalls, by hopping on and sliding down boulders the size of bungalows which had once been sprinkled down the gorges like hundreds and thousands by ancient torrents too muscular to imagine.

Anyone who has ever visited the rainforest gully at the Australian National Botanic Gardens may achieve a rough idea of what the creek is like in its more placid phases if they can imagine bigger and more contorted tree ferns, fallen logs straddling the creek and offering burly bridges to nowhere but the dense understorey, and, above them, immense and skyscraping trees some of which were saplings when the First Fleet ruined the neighbourhood by arriving in Australia.

The tree ferns dominate the edges of the creek. I talk to plants at the best of times but obliged to barge into the ferns and squeeze between them on many occasions I found myself saying "Sorry!" and "Excuse me!" to plants which have vaguely

human proportions and which, when they are upholstered with moss, are a little like tall, lithe basketball players in chunky pullovers. Where they have fallen over, their massive fronds making them top heavy and topple-prone, they continue to grow with the trunks lying horizontally and with the crowns looping upwards again towards the light (imagine the shape of a tobacco pipe). When this happens other plants, sometimes including some smaller ferns, take root in the trunks and sprout all along their length.

When and if the logging begins the nations' greenies will feel the most angst on behalf of the trees but, alas, the tree ferns, lots of them as old as the mature trees, will be victims of the chainsaw massacre too, because trees will fall on them and because, where they stand between the loggers and their trees, they will be knocked down.

Indeed, it is quite wrong to think of native forests as being nothing but trees. The long stretch of forest that we traversed on our way back to the cars was a botanical smorgasbord with a complicated population of understorey shrubs, including swathes of a form of the Austral indigo, *Indigofera australis*, with flowers of an unusual candy pink, stands of prickly oxalobium, *Oxalobium ilicifolium*, with flowers of a bright orangey yellow and the big white flowers of the climber Australian clematis, *Clematis aristata*, glowing in the gloom.

The way out of the forest area and back to the highway passes beside an area which has been logged. It looks like nothing on earth. A few token trees have been left as seed trees and habitat trees, but they stand alone and isolated and wretched. Fires lit to dispose of debris have seen to it that there is no understorey at all. In the propaganda war over the forests the loggers and their apologists do suffer from the disadvantage that logging creates shocking uglyscapes until, eventually, regrowth of some of the original species does soften the panorama. In the interim the greenies take and publish the shock pictures in the hope that some of the shock will reach the generally shockproof hearts and minds of the politicians who have to decide whether the song of the chainsaw should be allowed to drown out the songs of the birds.

NSW Cabinet splits on logging in Eden region

By EAN HIGGINS

The NSW Cabinet has split over woodchipping in the State's south-east.

The Minister for Agriculture, Mr Hallam, yesterday came out against the call by the Minister for Planning and Environment, Mr Carr, for new national parks in the Eden region.

Mr Carr also came under attack from the NSW Labor Council, which also rejected the national parks proposal on the basis of employment protection.

The row comes at the worst possible time for the State

Government, which is fighting the Heathcote by-election largely on the environmental issue of national parks.

It is running an advertising campaign portraying the Labor Party, in contrast to the Liberal Party, as the only protector of the environment from the pillage of commercial exploitation.

The division confirms indications that NSW may turn out to be the next national political battleground in logging and environmental issues, with the Federal Government also having to make decisions soon on woodchipping in the area.

On Tuesday Mr Carr launched the Labor Party's latest environmental assault.

Questioned on calls to protect the Coolangubra and Tantawangalo State forests in the Eden area from logging, Mr Carr said he had received recommendations for two new parks from environmental groups and expected to receive an assessment in May from the National Parks and Wildlife Service.

He said his personal view was that "there is very good potential for the creation of major new national parks in that region of the State".

This would exclude logging

entirely in those areas of ecological significance, he said, although he suggested a compromise in which industry would proceed in other areas.

But, when asked yesterday if Mr Hallam agreed with this proposal, a spokesman said, "he doesn't".

"It's not as if there is a shortage of national parks in the area," the spokesman said.

He said existing national parks included Deua, Moreton, Nadgee, Bournda, Ben Boyd, Wadbilliga, Mimosa Rocks, Nungatta, Mt Imlay, Nalbough, Kosciusko and Egans Peak.

Logging could be carried

out in the two State forests in question, the spokesman said, but any areas of particular significance could be protected as forest reserves.

The Cabinet split divides those ministers more concerned with the "greeny" vote from those more directly worried about employment.

The Minister for Industrial Relations, Mr Hills, was not available for comment.

The NSW Labor Council's organiser in charge of forestry matters, Mr Tim North, yesterday said council officials and the ACTU's main official on logging issues, Mr Bob

Richardson, had met Mr Hallam, Mr Unsworth, Mr Hills, and a representative from Mr Carr's office last September.

There, the union officials expressed their opposition to any new national parks in the south-east, arguing that the protection of employment in the sawmills and chip mills in the region was essential, and that the local environment was already adequately protected.

"There must be continued access to those resources," Mr North said.

If new parks were created, he said, "a lot of people are going to get hurt".

lent of the question 'Have you stopped beating your wife?' returned the unflappable Richie.

However, fellow commentator and World Series Cricket veteran Tony Greig wasn't pulling his shots.

"I'm a Packer man to the bootlaces."

— Gerard Noonan
and Carolyn Cummins

as a company with prominent US interests — perhaps even more prominent than it now is in Australia.

Only two months before, Consolidated Press made its biggest ever thrust into an overseas market by acquiring G.F.V Communications Inc, the largest publisher and producer of coupon inserts in the United States.

Conpress will not reveal what it paid for G.F.V. but industry sources said the price was very high, perhaps equal to the total net worth of Conpress. But the acquisition has given the

others' property... he approached me, then I thought I might be able to buy his and he thought he might be able to buy mine. He was right and I was wrong.

"He wanted to buy more than I wanted to buy."

He said it was inevitable that in the wake of recent changes in the Federal Government's media policy that rationalisation of the television industry would occur. He believed the Nine Network had the best chance of continued success if it was sold intact.

New NSW national parks plan

By EAN HIGGINS

The NSW Government could take the conservation lead in the controversial woodchip logging dispute in the State's south-east by declaring new national parks.

Amid Labor Party efforts to make environmental issues a key fighting ground in the State's two by-elections and the Tasmanian logging dispute, the NSW Minister for Planning and Environment, Mr Carr, said he favoured new parks in the Eden area.

The move represents an interesting contrast to the Tasmanian battle.

The Federal Government will soon decide whether to renew Eden woodchipper Harris-Daishowa (Australia) Pty Ltd's export licence, and meanwhile, two forest areas have been nominated for listing in the National Estate.

But by creating national parks, the State Government could set the pace by banning commercial exploitation completely in designated areas.

Mr Carr made his remarks at a news conference in Sydney to launch the second wave of the Labor Party's advertising campaign on environmental issues for the Heathcote by-election.

Asked the Government's position on logging in the

Tantawangalo and Coolangubra State forests, Mr Carr said he expected to receive an assessment in May from the National Parks and Wildlife Service on two new-park proposals in the Eden region.

This followed submissions from environmental groups.

Asked if he had a personal view, he replied: "I think there is very good potential for the creation of major new national parks in that region of the State."

He said he was awaiting "detailed confirmation of that instinct" from the service.

However, he hinted that declaration of new national parks would form part of a compromise package.

"I believe that in Eden we can achieve a policy that protects significant areas, areas of ecological significance, within National Park status but permits the industry in areas that don't have that ecological significance," he said.

This would maintain employment levels.

He later said the Government did not accept the position of the Australian Conservation Foundation's NSW campaign officer, Ms Jane Elix, that logging in the Eden area be phased out over a number of years.

According to Labor Party

sources, jobs are more important for votes than the "greeny" element but finding a balance between the two could be crucial in holding the marginal Federal seat of Eden-Monaro and the marginal State seat of Monaro.

Harris-Daishowa has warned of dire consequences if it is not allowed to log Tantawangalo and Coolangubra.

The two areas form part of the company's 280,000-hectare woodchip concession.

Harris-Daishowa's general manager, Mr Peter Went, said yesterday that while the two State forests had not yet been logged, they were key areas for exploitation in the company's new management plan.

He said that if they were excluded, it would cost 49 jobs immediately at the company's chip mill and result in the closure of two sawmills with more than 500 jobs involved, not to mention indirect employment.

Meanwhile, the Labor and Liberal parties both raised the environmental issue in the by-election for Heathcote, which includes the Royal National Park.

The Labor Party's strategy is three-fold; to scare voters that a Liberal-National Party government would allow both logging and sand mining in

the park established in the last century; to try to drive a wedge in the Opposition; and to undercut the position of independents running on environmental issues.

One Labor advertisement in the local press shows a scene of devastation with a heading reading: "Vote Liberal for a Wide Open National Park."

Mr Carr produced a list of press clippings purporting to prove his point.

Both the Opposition Leader, Mr Greiner, and the NSW National Party Leader, Mr Murray, vigorously denied any intentions of commercial exploitation of the Royal National Park, and Mr Greiner said he would resign if a coalition Cabinet went against him on such an issue.

Mr Bryce McNair, of the Forest Industries Association of Tasmania, said yesterday that compensation for the timber industry in Tasmania would cost at least \$120 million a year.

Mr McNair was commenting on the Federal Government's announcement on Monday that it was considering offering "appropriate compensation arrangements" for timber companies affected by the current review into the logging of National Estate areas in Tasmania.

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SUBMISSION BY
THE NATURE CONSERVATION COUNCIL OF NEW SOUTH WALES
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE EDEN (N.S.W.) EXPORT WOODCHIP OPERATION
FOR THE PERIOD 1989-2009, April 1986.

Proposed by Harris-Daishowa (Australia) Pty Ltd.

28 July, 1986

1. INTRODUCTION

The Nature Conservation Council of New South Wales presents the following comments on the above-named Draft Environmental Impact Statement.

The Nature Conservation Council of N.S.W. comprises 77 conservation organisations throughout the state, and has had a long-standing concern during its thirty-year existence for the adequate conservation and proper management of the state's forest ecosystems.

Council strongly recommends that Harris-Daishowa (Australia) Pty Ltd. be refused an export licence for the proposed woodchip operation because of its adverse impacts on the long-term conservation of forest ecosystems and species inadequately represented in the region's existing National Parks and Nature Reserves. In addition, the proponents have failed to demonstrate the long-term sustainability of their timber extraction operations.

Council finds the Draft EIS an inadequate document on which to base a decision on the granting of an export licence because of deficiencies in its consideration of a number of matters, as outlined in this submission.

The most fundamental inadequacy of the EIS is its inability to enable assessment of the full environmental impact of the proposal without active participation as joint proponent by the Forestry Commission of N.S.W., which is responsible for forestry management procedures which form an integral part of the operation. Council's recommendation concerning this inadequacy is contained in Section 11 at the end of this submission. This recommendation, together with those in Section 2, form Council's major recommendations for immediate government response to the proposal. Recommendations relating to specific aspects of the proposal and the EIS are contained throughout the body of this submission, and have generally been highlighted by underlining.

2. MAJOR RECOMMENDATIONS

The Nature Conservation Council of New South Wales strongly recommends that approval not be granted for a woodchip export licence to Harris-Daishowa (Australia) Pty Ltd. for the years 1989-2009, for the following reasons:

2.1

The existing and proposed timber extraction operations by Harris-Daishowa will have an adverse effect on the long-term survival of the region's forest ecosystems, including wildlife, which are inadequately conserved in existing National Parks and Nature Reserves.

2.2

The sustainability of the existing and proposed pulpwood extraction operation has not been demonstrated by the Harris-Daishowa (Australia) Pty Ltd Environmental Impact Statement and the Eden Native Forest Management Plan 1982, on which the EIS depends for basic information.

2.3

The E.I.S. provides insufficient information on which to base a decision regarding granting of an export licence for 1989-2009. Deficiencies are particularly evident in the following areas:-

- . existing flora and fauna inventory of the region
- . forest management necessary for wildlife conservation
- . future pulpwood and sawlog resources
- . pulpwood yield estimates from logging regrowth thinnings
- . effect of project on water resources and catchment hydrology
- . effect of soil fertility levels on growth rates of future timber resource
- . alternatives to the proponents' proposal.

As stated in the EIS page 4.3, a working group chaired by Dr. D.A.N. Cromer, Director General of the Forestry and Timber Bureau, found that only fragmentary data existed on the biological and ecological features of many of the areas where woodchips were harvested; hence a large degree of uncertainty surrounds the nature and significance of the environmental impacts. The EIS states that no original research was undertaken in preparing the section on "Existing Environment" (page 7.1).

Approval of the project on the basis of information provided in the EIS would run counter to Recommendation Number 1, regarding Export Licences, of the Senate Standing Committee on Science and the Environment, in their report on Woodchips and the Environment (1977), namely -

"Until such time as the environmental problems relating to soil nutrients, wildlife preservation and the conservation of genetic characteristics.....are satisfactorily resolved, and with the exception of proposed projects intending to use as chip material only waste from genuine sawlog operations, no licence for the export of woodchips be issued to new projects."

2.4

In addition, the Nature Conservation Council of N.S.W. strongly recommends that no approval be granted to Harris-Daishowa (Australia) Pty Ltd, for an increase in the current export woodchip quota up to 1989, because resource availability has not been adequately demonstrated, and all relevant environmental factors have not been considered. Approval of this quota increase

would contravene Recommendation Number 2 of the above-mentioned Committee, namely-

"No increase in the quantity of chips to be exported be approved without the most careful consideration of all relevant environmental factors as set out in this report."

The EIS appears to give no special consideration to the environmental impacts of this proposed quota increase, and refers primarily to personal communications on potentially available resource as the justification for a quota increase. Therefore, similar concerns about environmental impact apply to this quota increase as apply to the application for licence renewal beyond 1989.

3. IMPACT ON WILDLIFE

3.1

Integrated logging, as practised and proposed for pulpwood extraction, will have an adverse effect on forest wildlife, such that the long-term survival of the region's wildlife is not assured.

Integrated logging as practised and proposed for pulpwood extraction for Harris-Daishowa (Australia) Pty Ltd (HDA) will have an adverse effect on forest wildlife. The EIS admits (page 2.12) that "...there are still many limitations in knowledge concerning the forest fauna of the area, and the impact of logging and fire." There is very little information on the region's forest invertebrates, amphibians and reptiles. Some research has been published on birds and mammals, but for most species insufficient research has been carried out on individual requirements to be able to predict with accuracy the likely effect of integrated logging operations on long-term survival. For faunal species on which research has been carried out, an adverse effect is predicted if current woodchip operations continue.

Integrated logging removes most of the very old trees required to provide nests for at least 24 species of tree-dwelling mammals and birds (gliders, pigmy possums, bats, lorikeets, cockatoos, owls, tree-creepers). Also, integrated logging removes large amounts of tree canopy, needed as a food resource for, e.g., nectar-eating birds, koalas.

Wildlife known to be affected adversely by "integrated logging" operations for woodchipping include:

- i) birds and mammals which require tree hollows present in old trees as homes and nests for breeding -
 - . birds - at least 14 species
 - . gliders and possums - at least 6 species
 - . some forest bats - at least 4 species

(Hollows generally begin to appear in eucalypts from about 50 to 100 years of age, depending on species.)
- ii) nectar-feeding birds, including honeyeaters, lorikeets and silvereyes, which require flowering tree canopies of a variety of species to ensure year-round food resources;
- iii) birds which forage on mature tree trunks, notably the treecreepers;
- iv) the koala, which needs to forage in tree canopies on leaves, and is already uncommon in the area.

3.2

Recommendations for forest management designed to ensure the long-term survival of the region's wildlife have not been followed in the existing woodchip operation, and are not proposed.

The HDA operation proposes the cutting of the entire old growth forest allocated for integrated logging in the Agreement Area within forty years, by 2010.

The nature and extent of unlogged areas of old growth forest are of crucial importance to wildlife survival. Recher, Rohan-Jones and Smith, in 1980, after conducting specific research into the effects of the Eden woodchip operations on forest birds and mammals, recommended a number of management prescriptions necessary to help achieve the objective of species conservation. These are summarised on pages 54-56 of their paper, Effects of the Eden Woodchip Industry on Terrestrial Vertebrates with Recommendations for Management, published by the Forestry Commission of N.S.W. as Research Note No. 42, 1980.

These recommendations have not all been followed in management prescriptions currently in operation and proposed for HDA's future operations.

For example, Recher et al recommended the following requirements for buffer strips:-

- . forty metres to either side of a watercourse should be the minimum width for buffer strips;
- . logging should be excluded from any part of the buffer strip;
- . buffer strips should be extended to the top of some drainage lines within each compartment.

Rather than support these management prescriptions in total, the Forestry Commission's Eden Native Forest Management Plan (1982) (ENFMP) in Appendix 9, and Appendix 4A of the EIS, specify that a filter strip shall be a minimum of 20 metres each side of a watercourse for slopes under 18°. Trees may be felled within or into filter strips provided no tree is felled "deliberately or negligently" into a stream.

In addition, filter strips may be burnt as a result of post harvest burning operations. Thus it is misleading to regard filter strips as unlogged wildlife refuge areas. In fact, current prescriptions for filter strips appear to be weaker than those in force ten years ago, when no trees could be felled nor logging machinery come within 40 metres of any stream with a catchment area greater than about 50 hectares. Also, filter strips do not conserve habitats away from watercourses.

Policing of prescriptions relating to filter strips is very important. Because logging crews received piece rates rather than wages and are under pressure to meet pulpwood quotas, the temptation to fell trees in gully sites, which often support the biggest and most profitable trees, is considerable.

Recher et al also recommended that the length of the logging cycle should be staggered through space and time, in order to ensure survival of birds and mammals which require older trees. Although the Forestry Commission has introduced its PMPC system, including the "Special Emphasis Flora and Fauna Protection" category, this is not part of a comprehensive system of staggered logging cycle lengths. Longer cycles will not come into operation until after all old growth forest has been cut in the first 40 years to 2010.

Confidence in the effectiveness of the Forestry Commission's PMPC system in protecting valuable wildlife habitat has been undermined by events such as the fate of the Waratah Creek area in Coolangubra State Forest, described under section 6.3 in this submission.

3.3

Insufficient research has been carried out to enable comprehensive assessment of the proposal's impact on the region's wildlife.

Recher et al (1980) reached the following conclusions, in part, on the effect of clearfelling operations on wildlife.

- . "There will be a decline in the abundance of animals which require mature forest."
- . "A number of birds and mammals may be threatened with extinction on a regional level."
- . "Changes in the pattern of flowering and the abundance of nectar will affect the movements and numbers of nectivorous birds."
- . "There may also be other changes in abundance, patterns of movement or nesting cycles which will not become apparent until a significant part of the existing mature forest is logged and replaced by regeneration."

This last conclusion suggests that further wildlife research should have been funded by the proponents so that results could have been presented in the EIS to enable proper assessment of impact of the proposal on wildlife. The type of research needed includes habitat size and food resource requirements of wildlife dependent on mature forest, migratory capacity, and present population size within State Forests and national parks and nature reserves. This research has not been done, in fact, the EIS states (page 7.1) that "no original research was undertaken in preparing this section [Existing Environment] of the study."

Approval of the project as proposed in this EIS would therefore run counter to recommendation number 21 of the Senate Standing Committee's 1977 report, Woodchips and the Environment, namely, that-

"The Federal Government pay particular attention to the conservation status of forest flora and fauna when considering the issue of export licences, with a view to approving export proposals only where necessary steps have been taken, as published in State land management proposals, to adequately conserve flora and fauna species of the proposed area of supply."

Conservation of birds and animals in State Forests and flora reserves is one of the statutory objectives set out for the Forestry Commission under the NSW Forestry Act, [S.8A (i)(e)(ii)].

4. ADEQUACY OF THE REGION'S EXISTING CONSERVATION RESERVES

Because of the adverse impacts of integrated logging on forest wildlife, as described above in Section 3, adequate undisturbed areas of forest habitat and food resource are required in the form of national parks and nature reserves to ensure conservation of forest ecosystems and species. The existing national park and nature reserve system represents the result of political trade-offs rather than a survey of adequate conservation needs. According to Recher et al (1980), "with the exception of Nadgee Nature Reserve, none of the parks was established following a survey of their flora and fauna, nor was the

scientific community consulted." The vegetation consultant states in the EIS (page 7.19) that "no comprehensive survey of the entire area has yet been carried out....In the opinion of the author, such a survey is urgently needed if the adequacy of the existing reserve system is to be properly assessed."

Recher et al (1980), after specific research on forest birds and mammals, concluded:-

"We do not consider the National Parks and Nature Reserves in the Eden District adequate by themselves for the long term conservation of the region's wildlife"

Thus, additions to the national park and nature reserve system are essential if the region's plant and animal diversity is to be conserved.

The following national parks and an extension have been proposed to augment the region's conservation reserve system. The national park proposals contain areas of National Estate significance.

a) Coolangubra National Park

Comprising 48,000ha including the existing Nalbaugh and Nungatta State Forests. This proposal contains a great diversity of vegetation types and habitats, spanning a transition zone from coastal forests to highland forests. It has wilderness value and great wildlife significance, containing possibly the best arboreal mammal habitat known in Australia at Waratah Creek. This area of great wildlife significance has been recognised by the Forestry Commission, but has not been protected from logging. The richest habitat for these arboreal mammals has been substantially cleared for agriculture and pine plantations, so that management of the remaining suitable habitat is critical for their conservation.

b) Tantawangalo National Park

Tantawangalo National Park would conserve undisturbed a catchment area vital for the protection of quality of water supply to local towns. It also supports a rich and diverse bat fauna as well as large numbers of arboreal mammals and birds.

c) Merrica River catchment addition to Nadgee Nature Reserve

The entire Merrica River catchment should be added to form a rational boundary for management of Nadgee Nature Reserve. This would implement Proposal number 21 of the Senate Standing Committee on Science and the Environment, in their report Woodchips and the Environment, 1977.

Proposal 25 of the Standing Committee also urged Governments to give most serious consideration to the conservation status of forest flora and fauna, discouraging further projects involving clearfelling for woodchips if necessary.

Recommendation: The export licence should not be approved because the project proposes to subject to integrated logging areas which are on the Interim Register of the National Estate and should be added to the region's national park and nature reserve system.

5. IMPACT ON THE CROWN TIMBER RESOURCE

5.1

Approval for the project should not be granted because the proponents have failed to demonstrate that their projected pulpwood resource is available for harvesting in an environmentally acceptable manner.

Within the EIS and ENFMP '82 there are several differing estimates on just how much State Forest land will be subjected to integrated logging for pulpwood extraction.

The EIS, on pages 4.9-4.10, claims that of 279,000ha of State Forest in the Agreement Area, 97,000ha will be "excluded from logging" and "will be substantially unaffected by logging". This suggests 182,000ha will be used for integrated logging including pulpwood extraction.

However, Table 1.A.1, Appendix 1A of the E.I.S. lists the total area available for routine wood production within the Agreement Area as 231,900ha, and uses this area as the basis for calculating the pulpwood resource. By multiplying it with the estimated yield of 87.9 tonnes/hectare, pulpwood resource totalling 20,374,000 tonnes was estimated, of which 6,891,000 tonnes has already been harvested, leaving 13,483,000 tonnes, which the proponents allocate to the provision of 530,000 tonnes per year until 2010, in Table 5.1 of the E.I.S. Appendix 1A states: "The resource estimates given above include volumes in those areas alongside streams which are now being left largely unlogged. The volume of pulpwood not utilised in stream-side situations amounts to some 2% of the original estimate of total pulpwood availability." This would reduce the original estimate by 407,480 tonnes, equivalent to 4636ha of unlogged forest, leaving, presumably, 227,300ha to be logged for pulpwood resource. Elsewhere, (e.g. in the ENFMP '82) the figure of 218,000ha is quoted as the area of State Forest available for pulpwood extraction.

The difference between the area of 231,900ha on which the pulpwood resource estimate was initially based, and the resource available from 182,000ha, represents 49,900ha, which is equivalent to over eight years' supply at 530,000 tonnes per annum:

The proponents do not acknowledge this deficiency. Instead the EIS claims (page 5.10) that "the prescribed yield of 530,000 tonnes per annum can be sustained until the year 2010 or the end of the 40-year first cutting cycle. Some pulpwood from thinning is expected to become available after the year 1995. The volumes have not been assessed at this time as sufficient data is not yet available on logging regrowth....The nett effect of the progressive switch in resources [from old growth resource to thinnings] is that the life of the old growth resource may be extended.....beyond 2010."

Thus, although the proponents refer here to a contribution to the pulpwood resource from thinnings, they admit (in section 5.3.1 of the E.I.S.) that insufficient research has been done by themselves or the Forestry Commission to provide accurate assessments of future thinnings volumes. The work of Bridges cited in the EIS and ENFMP '82 relates to thinnings trials in forest regenerating after fire rather than after integrated logging. Growth rates of regeneration after fire may be significantly different from those of regeneration after integrated logging.

In addition, the proponents admit (page 5.16, E.I.S.) that "there are still significant problems to be overcome before thinnings reach a stage of being competitive with other sources of chipwood."

Recher, Rohan-Jones and Smith recommended in 1980 that "a major research programme should be initiated as a matter of urgency into methods of thinning, silvicultural effects of different levels of thinning, and the use of smaller diameter logs for pulp." It is clear that the proponents have not considered this research important enough to have results available before applying for a renewal of their licence.

Thus, either the proponents have failed to demonstrate that the pulpwood resource is available, or they do not intend to follow environmental prescriptions. Approval for the export licence to the proponents should therefore be refused.

Approval of the project would contravene recommendation number 4 of the Senate Standing Committee on Science and the Environment in their 1977 report, Woodchips and the Environment, namely that-

"Renewal of licences for the export of woodchips be made conditional upon the assurance of means to ensure sufficient regeneration for future requirements, particularly on private land."

5.2

Approval for the project should not be granted because current forestry operations have resulted in overcutting of the sawlog resource beyond sustainable levels, and proposed operations will continue this process.

The proponents claim (EIS page 5.10) that "the often repeated charge that pulpwood harvesting in N.S.W. has hastened the demise of the sawmilling industry by chipping sawlogs and harvesting smaller potential sawlogs is not supported by fact." The proponents then cite management prescriptions, supervision procedures and licence conditions in support of this claim. (Appendix 10, cited as part of supervision procedures, was absent from the copy of the EIS supplied to the Environment Centre of N.S.W.).

However, the ENFMP '82 contains the following statements:

page 36 "It is apparent that sawlog commitments cannot be supplied in full by integrated sawlog/pulpwood logging operations aimed at meeting the pulpwood commitment."

page 36
-37 "There are sound reasons why the pulpwood allocation from the Management Area should not be increased. It would be desirable, therefore, on management grounds, to reduce the sawlog allocation to a level that can be supplied from integrated logging operations. The longer this adjustment is left the greater the reduction in yield that will ultimately be required."

page 36 "Actual yields [of sawlogs] have been greater than assessed." Figures quoted are 14.8m³ gross/ha actual cut compared with 12.1m³ gross/ha assessed volumes.

Appendix 1A of the EIS, Section 3, states, for the Eden District:

"Thirty-one percent of the assessed area has been logged in integrated sawlog/pulpwood operations since assessment. In this time about 32 percent of the adjusted assessed volume of pulpwood has been cut and about 39 per cent of the sawlog volume, indicating that yields of both products have been slightly higher than expected."

"Eden is the only District where logging has been almost completely integrated for the period under consideration. Actual pulpwood production per hectare has tallied closely with assessed yields. Actual sawlog production has been 26 per cent higher than assessed."

For the Bega District:

"...with 11 per cent of the area logged in integrated operations, 12 per cent of assessed pulpwood has been cut, and 17 per cent of sawlogs."

The ENFMP '82 also states:

page 35 "A very substantial reduction in yield is inevitable by the end of the initial cutting cycle. Whilst sustained yield is achievable in total wood production, the present levels of sawlog production cannot be sustained in the short term." (In fact, the table supplied shows the old growth sawlog crop being exhausted in 2002 at the present quota commitment level.)

page 36 "It is not possible at this stage to estimate the likely level of sawlog yield for the second cycle, but it is unlikely that 40 year old regrowth stands will be able to sustain the present yield."

This last statement is not surprising, considering that the estimated time needed for growth to sawlog quality is 80 years, possibly shortening to 50 years on the best sites. Inquiries to the Forestry Commissioner by the N.C.C. as to the sawlog resource after 2002 yielded a reply which referred us to the harvesting prescription (eg. page 60, ENFMP '82) which states -

"As a general rule, all trees considered capable of significant net merchantable value increment for economic harvesting during a subsequent cutting cycle shall be retained, except that such trees may be harvested as thinnings where the value increment of the stand will benefit."

We were invited to inspect the logging operations to confirm that "this prescription results in the retention of an appreciable number of such trees." No quantitative estimates of the extent of this future sawlog resource were provided.

Taken together, and in context, the statements above indicate that:-

either the pulpwood extraction operations have been allowed to determine a rate of timber extraction which has led to serious overcutting of the sawlog resource;

or timber volume estimates and/or forest management operations by the Forestry Commission of NSW are inadequate to ensure proper management of the Eden district's State Forests.

If the former is the case, then approval of a further export licence to HDA will see a continuation of overcutting of the sawlog resource, and will be the cause of the sawlog industry's demise.

If the latter is the case, the management of the Eden region's State Forests by the Forestry Commission of N.S.W., on which the HDA project depends, needs to be examined and revised before any consideration can be given to approval or otherwise of HDA's proposal.

5.3

Approval for the project should not be granted because HDA's proposed operations will leave State Forests in a condition where the sustainability of the operation through the second cutting cycle (2010-2050) has not been demonstrated

Sustainability of pulpwood and sawlog timber extraction beyond 2010 has not been demonstrated by the proponents, as evidenced in sections 5.1 and 5.2 above. The evidence presented indicates that present sawlog yields are not sustainable. The future pulpwood resource, heavily dependent on regeneration growth thinnings, has not been demonstrated; the only estimates presented (in Appendix 1E) are based on post-fire regeneration, not post-logging regeneration.

6. IMPACT ON THE NATIONAL ESTATE

Approval for the project should not be granted because it proposes logging which will destroy or impair values of National Estate areas.

As discussed in Section 7.1.10 of the E.I.S., four areas approved for listing on the Interim Register of the National Estate are affected by the proposal.

6.1

Nunnock Swamp Flora Reserve

Although reserved from logging by its existing Flora Reserve status, for its National Estate values to be preserved great care is needed in the fire management of the surrounding area. Proposed hazard reduction burning on a 3-5 year frequency, if allowed to escape into the Flora Reserve, could have a disastrous effect on the Reserve's rare Eucalyptus parviflora population. For the integrity of the swamp great care needs to be exercised in pulpwood extraction in its catchment; the EIS gives no details on this matter.

6.2

Nethercote Falls and Associated Rhyolite Outcrops

Although part of this area is classified under the PMPC system, it is surrounded by a pulpwood extraction area. The EIS does not give details on fire management procedures for the pulpwood extraction area which will ensure the preservation of the rare plants and vegetation communities of the area on the Interim Register.

6.3

Coolangubra Forest Area

Although the EIS claims the Forestry Commission has recognised the importance of the Waratah Creek area as arboreal mammal habitat, and classified it under the PMPC system, local observation reports that in fact the stippled area designated for Research on Fauna Values in Figure 7.6 was virtually all logged and subsequently designated as a faunal research area; except for the stippled area NW of the intersection between Wog Wog Way and Coolangubra Forest Way, which comprises a Eucalyptus nitens plantation.

In addition, the major part of the Coolangubra Forest Area on the Interim Register comprises a wilderness area, with which timber extraction operations are completely incompatible.

These examples demonstrate the inadequacy of protection which would be afforded to this area's National Estate values by continued management as State Forest. The Coolangubra Forest Area's wildlife and wilderness values must be protected by its dedication as a National Park.

6.4

Tantawangalo Creek Catchment

For this area any logging must be of secondary priority compared with the maintenance of the water quality values of the Tantawangalo catchment. The EIS claims (pages 7.36-7.37) this area represents considerable pulpwood and sawlog resource. However, this resource is not available, pending studies to be undertaken by a committee set up to report on whether wood production is compatible with water quality. The PMPC "Special Emphasis Catchment Protection" classification reflects the importance of protecting this area's stream values.

7. WILDERNESS

The export licence should not be approved because it is inexcusable that pulpwood harvesting operations which have compromised previously-identified Wilderness Areas should be allowed to continue to destroy more wilderness.

Discussion of wilderness in the EIS on pages 7.45-7.47 shows that pulpwood extraction managers have shown disregard for the wilderness areas defined in the report of Helman et al (1976). Buffer zones for the Nadgee, Genoa and Brogo Wilderness Areas, and the core of the Genoa Wilderness Area have all been compromised by pulpwood harvesting operations. The EIS proponents show a similar disregard for the classification of the Coolangubra Wilderness Area.

8. ENVIRONMENT PROTECTION, MONITORING AND REVIEW

The EIS gives insufficient information on how environmental protection measures will be monitored for their effectiveness, especially in the publicly-owned state forests. The proponents mention in Section 10 several "prescriptions" which will be followed as environment protection measures, notably for soil erosion, for maintenance of non-wood values, and for wildlife. The EIS admits (page 10.15) that "supervision and control of operations are of fundamental importance in maintaining the standards of harvesting and rehabilitation work."

The Senate Standing Committee on Science and the Environment, in its 1977 Inquiry into Woodchips and the Environment recommended that:

"Renewal of existing licences for the export of woodchips be granted only when it can be shown that implementation of environmental protection measures laid down by forestry authorities, as amended from time to time in the light of new knowledge, is fully effective."

Despite this important conclusion, the E.I. S. fails to give detail on how monitoring procedures have improved in effectiveness since 1977. It admits that "the standard of implementation of snig track drainage prescriptions varied between operations." Mention is made of a training course in "harvesting" techniques provided for operators, some modifications to environmental protection prescriptions, and figures are given (page 4.47) for penalties for breaches of licence conditions (201 warnings, 93 suspensions and 1 life banning).

These indicate that a significant amount of breaching of environmental protection provisions has occurred in the past.

The Standing Committee also concluded in 1977:

- 2.2.37 The Committee is not satisfied that forestry authorities are doing all that could reasonably be expected in the way of ensuring that existing environmental protection prescriptions are correctly implemented in the forest.
- 2.2.39 Even where well established prescriptions exist, it is evident that management structures and lines of responsibility for their practical implementation are for the most part either poorly delineated or only partially effective. This is a problem requiring resolution at the highest management level.
- 2.2.40 Worthwhile and really effective environmental protection must have its origin in a recognition by senior management of its importance.
- 2.2.43 With the exception of a few areas, the Committee is not satisfied that the importance of environmental protection is properly understood by those whose responsibility it is to carry out the protection work in the forest.
- 2.2.47 Without real incentive or control, forest management practices for environmental protection will operate at a minimum standard.

The Commission's Wildlife Policy for the Eden Region is often cited as demonstrating the Commission's ability to manage the forests for wildlife conservation. However, the Policy by itself is useless without effective policing and monitoring. Prescriptions relating to filter strips need to be policed because of the temptation to logging contractors paid piecework rates to fell large profitable trees in gully sites. The effectiveness of the habitat tree prescription in conserving wildlife needs to be monitored. This type of monitoring is not amongst those listed as being undertaken routinely in Section 10.5.1 of the E.I.S. How is the effectiveness of the Wildlife Policy monitored?

In order to give an accurate assessment of environmental impact in the future, the EIS needs to contain more information from the Forestry Commission on past adherence to environmental protection prescriptions and precise specifications as to how breaches would be prevented in the future. A programme monitoring the effectiveness of environmental protection prescriptions also needs to be undertaken.

Environmental protection measures applying to pulpwood extraction from private land also need to be considerably upgraded.

9. ALTERNATIVES NOT CONSIDERED ADEQUATELY IN THE E.I.S.

Federal legislation requires that the EIS "assess the potential impact on the environment of the proposed action and any feasible and prudent alternative to the proposed action." This EIS is deficient because the following alternatives and their impacts have not been adequately discussed and assessed.

9.1,

Hardwood plantations for the supply of woodchips

The EIS devotes only half a page to dismissing this alternative (on page 6.4) without providing any justification. Although trial eucalypt plantations have been established since the early 1970's, no data from these trials are given. Data from successful Eucalyptus grandis plantations which the Forestry Commission has purchased on the north coast could provide useful information, but are not mentioned.

The impacts of hardwood plantations in terms of:-

- . better utilisation of already-cleared land
- . reduction of environmental impact on native forest
- . provision of employment

are not even alluded to.

9.2

Use of forest thinning, combined with sawmill residues, as the woodchip resource.

Insufficient work has been done on the feasibility of using thinnings for the bulk of the woodchip quota. In 1980 Recher, Rohan-Jones and Smith (reference under "Wildlife" above) recommended to the Forestry Commission that:

1. An increasing amount of pulpwood should be taken as thinnings from logging and fire regeneration. A major research program should be initiated as a matter of urgency into methods of thinnings, silvicultural effects of different levels of thinning, and the use of smaller diameter logs for pulp.
2. A greater proportion of wood should be used from each tree, and the range of wood products extended. Whole tree logging and on-site chipping should be thoroughly investigated with the economics of the operation evaluated in consideration of the likely benefits to wildlife from the diversification of the logging rotation system.

This work should have been carried out by now and its results included for discussion in the EIS. No work on recommendation 1. appears to have been done by the proponents, and work on 2. is only just being initiated (page 6.2).

9.3

Lower chip volumes

The E.I.S. should contain a much more detailed review of alternatives to the logging of the proposed National Parks and National Estate areas.

The E.I.S. states that the exclusion of logging from areas which are on the Interim Register of the National Estate and have been nominated as national parks, notably Coolangubra and Tantawangalo, will reduce the pulpwood resource by 172,900 tonnes (page 6.7). The E.I.S. claims (page 9.7) that this will reduce the woodchip mill from a two-shift to a one-shift operation, thus reducing employment. A two-shift operation requires 715,000 tonnes per annum (page 9.7); the proponents are applying for 850,000 tonnes per annum altogether, and claim the mill would cease to be viable at 600,000 tonnes.

The EIS does not make explicit the fact that if the proposed National Estate areas were excluded from logging, a maximum of less than 40,000 tonnes per annum would have to be found from additional sources in order to allow the mill to operate just above the minimum two-shift level.

One alternative source for this 40,000 tonnes could be other Forestry Commission areas outside the current Agreement Area, if it can be shown that the substituted areas are less environmentally valuable than the National Estate areas. Another possibility is that of more intensive and efficient management of existing forests, leading to a higher productivity per hectare. Plantation sources should also be considered. The E.I.S. fails to examine in detail the important question of alternative sources.

9.4

Alternative uses of the timber resource

Alternative uses of the timber resource, involving development of timber-based industries which involve increased processing and therefore employment in the region, should be considered in detail in the E.I.S. The scribmer process is the only alternative mentioned, as a vague future possibility, on page 6.6

1982 employment figures for the Eden region (Bega Valley and Bombala Shires) showed that forest-based industry provided nearly 600 jobs (6% of the regional workforce). Woodchipping provides very little employment for the volume of timber used. Table 1.A.1, Appendix 1A of the EIS suggests woodchipping is using up about nine times more wood from old growth forest than sawlogging. However, direct employment in the woodchip mill is slightly less than in sawmills. Taking into account logging jobs, woodchipping still employs less than twice as many people as sawmilling.

Future employment prospects for many timber industry workers, especially in sawmilling, are not good, because, as outlined above under Section 5, the sawlog cut has been above sustainable yield levels. This is confirmed on pages 35 and 36 of the ENFMP '82. The table on page 35 of that document, (repeated in Appendix 1A of the EIS), shows that current sawlog commitments can only be met up to the year 2002 from the old growth sawlog crop, and the Management Plan states:-

"A very substantial reduction in sawlog yield is inevitable by the end of the initial cutting cycle" (page 35) and "...it is evident that the present sawlog cutting cycle will end before the present pulpwood cycle at existing rates of yield" (page 36).

Thus it is apparent that the woodchipping operation, though providing employment itself, has been contributing to the depletion of resource for the more employment-generating sawlog industry.

One would think that forest-based industries which made much better use of the timber resource in terms of job creation, would be of prime importance to planners and decision-makers with the welfare of the region at heart.

9.5

Tourism

Despite the fact that tourism is one of the most important employment-generating growth industries in the state, the EIS allots very little attention to it (pages 6.8, 7.56, 8.81). The possibility of increasing

regional tourism by increasing the forest areas reserved for conservation is dismissed in one sentence on page 6.9, with no provision of justifying figures.

Elsewhere in the state the creation of national parks has provided a major stimulus to tourism. Conservative estimates of total annual numbers of visits to National Parks and Wildlife Service areas in N.S.W. have indicated a steady increase from 13.8 million in 1980-81 to 14.9 million in 1983-84. The 1983-84 estimates for several inland parks in the north coast region include over 18,000 visits to the Border Ranges National Park, over 45,000 to New England National Park, and well over 60,000 to Dorrigo National Park. Such an influx of people and outside income cannot help but generate employment and other socio-economic benefits at both the local and regional level. When the EIS proponents dismiss tourism as unlikely to provide a feasible alternative to the woodchipping industry (page 3.82), this claim should be set in its proper context by comparison with the adverse economic effects due to loss of tourism resulting from destruction of natural areas. If the national parks inland from Eden are considered unable to attract large numbers of tourists, their small size should be compared with that of the larger inland northern national parks which attracted the visitation figures above. The N.C.C.'s recommendations in this submission for additional national park reservations would help to remedy any lack of attraction which may be due to small size.

10. OTHER INADEQUACIES OF THE E.I.S.

The requirements of an E.I.S. under the Commonwealth legislation, under which this EIS is being assessed, include the following:

- "S.4.1 To the extent appropriate in the circumstances of the case, an environmental impact statement shall -
- (f) include information and technical data adequate to permit a careful assessment of the impact on the environment of the proposed action:
 - (h) assess the potential impact on the environment of the proposed action, including, in particular, the primary, secondary, short-term, long-term, adverse and beneficial effects on the environment of the proposed action and of any feasible or prudent alternative to the proposed action."

However, despite these requirements, the E.I.S. on page iii says: "In some instances it was not possible to assess accurately the impact of the proposal through a lack of information. As with any document of this type it must be produced using information available at the time."

This approach taken by the EIS proponents is quite inadequate; the legislative requirements do not say that environmental impact assessment can be confined to information already available. If sufficient information is not available on which to base a decision, it must be obtained before the proposal is considered.

Examples where insufficient information is provided to enable impacts to be assessed include the topics discussed below.

10.1

Inclusion of uncertain timber resource

The Tantawangalo Creek catchment is the subject of study for a special committee, the Tantawangalo Committee, set up to determine whether logging can

proceed in this catchment at all, and if so, under what conditions. This committee has not yet made a decision on whether or not logging will proceed (EIS Appendix 6A, and page 7.37).

However, Section 6.2.3.1 of the EIS claims that the Tantawangalo Creek Catchment area nominated for the National Estate represents a significant proportion of the pulpwood and sawlog resource potentially foregone if National Estate areas were to be excluded from harvesting. This contribution to the timber resource is misleadingly portrayed by the proponents in Section 9.5.2.2 as though it is automatically available.

The N.C.C. recommends that the National Estate values of the Tantawangalo Creek catchment be preserved by its dedication as part of the Tantawangalo National Park.

10.2

Water

The EIS contains insufficient discussion on the long-term and wide-ranging effects of woodchipping operations which will involve large-scale alteration to soil surface characteristics, soil moisture retention capability, and transpiration regime. These changes are likely to have the following effects on streams which traverse catchments subjected to integrated logging-

- . stormflow peaks will be increased
- . persistence of streamflow in drought times will be decreased
- . erosion of streambanks and increased siltation downstream.

These effects will have impacts on-

- . agriculture downstream of woodchipping operations
- . water availability for town water supplies
- . estuarine industry dependent on good water quality
- . natural ecosystems.

The proponents have failed to provide an adequate assessment of these pervasive impacts of the project.

10.3

Soils

Although a geological map is presented in the EIS, the soils of the Eden region have not been mapped at a regional scale, except along the western boundary, and there seems to have been very little attempt in the EIS to relate future growth rates of the timber resource to different levels of soil fertility arising from different soil types.

10.4

Fire

The proponents continue to claim that improved access resulting from forest roading accompanying the woodchip operation will assist in suppression of wildfires. They have neglected to claim credit for one of the worst wildfires in recent years, when in 1980 a smouldering bark dump in Timbillica State Forest developed rapidly into a fire which burnt out 46,000ha of State Forest and Nature Reserve within a few hours. This fire started directly as a result of forestry operations, and the "improved access" via forest roading was unable to assure its control despite initial attack within 25 minutes.

In fact, forestry roading also provides improved access and opportunities for pyromaniacs, careless picnickers, and other people likely to increase the number of fires started. This impact is not considered in the EIS, although figures on causes of ignition are obtainable from fire protection authorities.

Like the Timbillica bark dump, the proponents are also proposing to inflict an insidious fire hazard on the region in the form of vast areas of densely-regenerating regrowth forest. This regrowth will carry heavy fine fuel loads, be susceptible to death itself if burnt when younger than 20 years, and create great difficulties for fire suppression if it catches alight when 10-15 years old. There is an inherent incompatibility between these constraints and the Forestry Commission's 1982 Fire Management Policy (ENFMP Appendix 26) of 3-5-yearly hazard reduction burning, which the EIS's Fire Behaviour consultant has understandably had considerable difficulty in trying to resolve (EIS page 8.23).

Thus, the EIS contains insufficient information on:

- i) the extent of increase in fire hazard the project will cause for the region;
- ii) the doubt this creates about the magnitude of the future pulpwood resource, and
- iii) the effect of proposed hazard reduction procedures on species conservation in this extensive forest area.

10.5

Vegetation

The Terrestrial Flora consultant highlights in Section 7.1.4 some of the deficiencies of the information on vegetation available in the EIS, as follows-

"No detailed vegetation map is available for the Eden management area...which will provide the bulk of the woodchips. In the opinion of the author, this is a major deficiency."

"The available information on the vegetation is very patchy. No comprehensive survey of the entire area has yet been carried out such that the subtler patterns of plant distribution can be documented, and sites of particular botanical significance identified. In the opinion of the author, such a survey is urgently needed if the adequacy of the existing reserve system is to be properly assessed. The lack of information for the Eden region contrasts poorly with the detailed information available for the adjacent forests of East Gippsland and systematic pre-logging flora and fauna surveys now being carried out in those forests."

The 1977 recommendation of the Senate Standing Committee on Science and the Environment, that export licences be approved only where necessary steps have been taken to adequately conserve flora and fauna species of the proposed area, has been quoted earlier in this submission.

In addition, the following important research areas need to be addressed, in the opinion of the vegetation consultant:-

- . effects of logging and fire on understorey vegetation
- . population biology of individual understorey species.

Because of the lack of a comprehensive vegetation survey, it is likely that there are many populations of rare and endangered plants in the region additional to the 10 listed in the Crown forests. Research by David Albrecht, of the National Herbarium, Melbourne, and others, suggests this is the case. For example, an undescribed species of Eucalypt occurs as a canopy dominant in parts of Coolangubra S.F. and Rockton section of Bondi S.F. This species has similarities to E. polyanthemus, which normally occurs west of the Great Dividing Range, and appears limited in distribution.

The Forestry Commission and EIS list 19 vegetation types as "forest types", a classification based on dominants of economic importance. An example of an alliance not listed in the EIS is the Melaleuca amyllaris-Kunzea ambigua community which occurs specifically on rhyolite outcrops, and contains rare species.

Deficiencies in the vegetation information supplied by the Forestry Commission and the EIS are indicated by comparison with the number of vegetation associations listed for the region by the National Parks and Wildlife Service of NSW, which we understand to be close to 90.

11. FUNDAMENTAL INADEQUACY OF THE E.I.S.

It is not possible to assess the full environmental impact of the proposed woodchip operations from this E.I.S. because forestry operations are largely under the control of the Forestry Commission of N.S.W., which has not contributed to the E.I.S. as a proponent. The following quotes from the introductory section, The Role of the E.I.S., page i, illustrate the situation.

"HDA (Harris-Daishowa (Australia) Pty Ltd), while nominated as the proponent of the continued woodchip operations, has little direct control over many of the aspects of the proposed operations as discussed in the document."

"The FCNSW (Forestry Commission of NSW) is responsible for all aspects of Crown forest management including planning, supervision, research, fire control and road construction."

"Accordingly, as distinct from most E.I.S.'s, the proponent (HDA) is unable to give undertakings concerning those aspects of the operation which are not under its control."

Areas where insufficient information has been provided to assess environmental impact include:-

- . allocation of timber resource;
- . supervision, control and monitoring of environmental protection measures; and
- . details on commitment to undertake environmental research and make research results publicly available.

Therefore, the Nature Conservation Council of N.S.W. recommends most strongly that approval of the export licence to the proponents be refused, on the grounds that the full environmental impact of the proposal cannot be assessed unless the Forestry Commission of N.S.W. submits an E.I.S. for assessment as joint proponent under Part V of the New South Wales Environmental Planning and Assessment Act, or participates in a public inquiry with format and terms of reference which will allow comprehensive assessment of all the matters discussed in this submission.

Prepared by
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PROJECT OFFICER
28.7.86

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186

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Dr Day has received a number of state and federal research grants in the areas of environmental isotope research, runoff generation, accelerated erosion, water demand management and riverine planning. She has experience in university teaching and research and is a member of national and international scientific bodies in hydrology, geology, Geography and environmental management. She has produced a book, Water and Coal and edited several other books on environmental quality management. She is writing a second book on water planning and politics.

DR DIANA GWENDOLINE DAY

My research interests lie within the fields of geography, geology and environmental sciences. My first degree was in geology, geography and economics. Following a Diploma in Education I completed a Ph.D. in catchment hydrology and geomorphology at the University of New England NSW. Subsequently I undertook further post-doctoral research into drainage network dynamics, runoff generation and water quality.

In 1981 I was invited to the Australian National University as a Research Fellow to initiate, with other research staff, the large Hunter Valley project within the Centre for Resource and Environmental Studies. This project examined the regional environmental (biophysical, economic, political and social) impacts of new and extensive surface coal mining development in an agricultural region. My research in this project has been summarized in a book published at the A.N.U. titled WATER AND COAL: INDUSTRY, ENVIRONMENT AND INSTITUTIONS IN THE HUNTER VALLEY, NSW. This research defined the escalating requirements for water and future demands, the planning for water supply infrastructure, water quality in the environment and the effect of energy intensive developments on the landscape, allocative issues and their political aspects, the organisational environment in water planning in NSW and, the interactions between public and private sector groups. An evaluation of water management problems in the region was made with suggestions for strategies and mechanisms for the resolution of important issues.

My research publications concern public policy questions in water and soils planning and politics, in particular; the mechanisms of water allocation; the conflict between energy and non-energy in-stream water uses and, river system dynamics and management. I have published on rural and mining land use change and its effect on the geomorphology of river basins, in terms of runoff changes, erosion and sedimentation. Further work has included appraisal of regional environmental planning and the changing scene of environmental impact assessment.

In 1985/6 my main research has been a study of the impact of land use on erosion and sediment yield from Australian catchments. The secondary data base was examined for representativeness and appropriateness in terms of current land degradation questions and the policies of natural resources management organisations. Recommendations for policy changes in terms of policy issues and data collection and network design were developed which facilitate a more integrated catchment approach to land use management.

A further field based project is ongoing to determine the controls of accelerated erosion and sedimentation within and external to unstable channel networks near and at Lake George, NSW. The environmental isotope Caesium-137 is being used in the study.

Two new research projects (funded by the Commonwealth Department of Resources and Energy and the A.N.U.) in 1986/87 include a study of river management, specifically of flow release policies from selected reservoirs in Australia and the associated rising conflicts of energy and environmental water requirements. The second project examines public participation and politics in water resources planning and focusses on the introduction of user pays domestic water pricing in Newcastle NSW.

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RESEARCH OVERVIEW

DIANA G. DAY

My current research at the Centre for Resource and Environmental Studies (CRES) at the Australian National University is within the area of water and land/soil resources planning and management. Previous research work has been in fluvial geomorphology, particularly studies of stream channel initiation and gullying and the hydrological, water quality and erosional changes in small and large catchments. A central component to this work and still ongoing is the study of disjunction between landform and process in stream system evolution.

At CRES I have developed a conceptual framework to more closely address the connectivity between water and land resource management systems. This considers the biophysical resource base as well as the institutional/planning environment. Work has encompassed public policy issues and provision of policy recommendations in water and land planning in the areas of

- . water allocation in rural and metropolitan Australia
- . land degradation and rehabilitation (for riverine and mined landscapes)

A range of institutional frameworks for management have been analysed in the above areas including inter-state comparisons and the role of the Commonwealth.

WATER ALLOCATION

Rural/industrial water allocation

In terms of water allocation I have researched industrialisation and water planning conflicts, with the Hunter Valley, NSW as a substantial case study which provides a number of generic policy recommendations. This was part of a Commonwealth (NERDDC) funded CRES study of resources development and regional environmental planning. My contribution comprised the first book on industrialisation and regional water planning in Australia and other published and co-edited works.

Important elements of my book 'Water and Coal' include the changing importance of water quality to society, analysis of the political and evolutionary path of water allocation decisions, the increasing importance of economic costs and incentives in pollution control and the nature of organisations as environmental problems. The increasing demands for re-evaluation of water allocation to environmental uses is also highlighted, along with increasingly complex societal values and the need to maintain sustainable hydrologic and aquatic ecosystems.

Urban water demand management

Water allocation tradeoffs and conflicts in metropolitan Australia are also of interest. One recent project (1986/87) is analysing the evolution of new metropolitan water management policies and the impacts this has on organisational structure and performance, and on the public and its participation. The introduction of user-pays domestic water pricing in Newcastle by the Hunter District Water Board has been used as a case study. Interactions between this utility and its public in relation to a new water pricing policy were analysed. Findings have applicability to organisations wishing to introduce new and often more radical policies and wishing to consider the importance of public participation. This work has received Commonwealth (AWRAC) support.

Instream water planning and reservoir flow release policies

Another research area of major interest is instream water planning or allocation of water to the comparatively unpriced uses and values of water which are non-consumptive and represent a non-energy use. These uses and values include wetland preservation, aquatic flora and fauna, water quality maintenance, for recreation and for river system stability. This project has received Commonwealth (AWRAC) and Australian National University funding support and provides the first broad examination of current and future water allocation conflicts and their resolution between environmental uses and consumptive/energy water needs.

Major regulated drainages in eastern Australia have been used as case studies for an analysis of the hydrologic impacts of large dams and the associated instream planning issues. A key aspect has been analysis of differing political and administrative systems in river management and particularly in issues of environmental water use.

Further related work comprises examination of changing Commonwealth roles in water and land planning, (such as in land degradation).

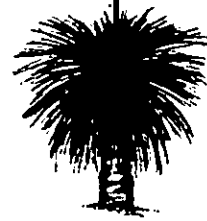
Land surface rehabilitation

Research has continued in fieldwork and analysis of drainage network evolution. This allows the establishment of form/process relationships and instabilities occurring within the landscape. Collaborative work with ANSTO has been undertaken in NSW relating to the use of the environmental isotope Caesium-137 as a tool to indicate erosion and sedimentation processes and hence the options for land management.

A linked research interest is on rehabilitation of land surfaces and river systems. Coal mine rehabilitation and the application of geomorphic and hydrological principles has been a major focus. This has allowed the development of links between rehabilitation and landscape architecture, engineering, aesthetic needs, economics and organisational controls and standards in mining.

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FOREST POLICY

INTRODUCTION

In formulating its forest policy, the NCC endorses one of the prime policy goals of the World Conservation Strategy:

"to manage the forest estate.....with commitment to maintain in perpetuity ecological processes, watersheds, soils and genetic diversity."

Similarly it aligns itself with that part of the National Conservation Strategy for Australia which states that:

"in the management of forest areas for timber production, due regard should be given to the various benefits and uses that the forest may provide and management should ensure that these benefits are sustainable."

The N.C.C. agrees with the NSW Forestry Commission's Statement in "Indigenous Forest Policy", published in 1976 that:

"there will continue to be a human need for the non-material values intrinsic to a forest environment such as catchment protection, wildlife habitat, natural scenic values and preservation of the scientific values of forest communities."

However, it disagrees strongly with any interpretation of the current Forestry Act which presumes to impose a responsibility to meet many demands placed upon the forest, with an emphasis on timber production.

In this policy the term forest is taken to encompass all the interdependent elements of the forest ecosystem, including dominant vegetation, understorey and ground cover strata, forest floor litter, soil microflora and vertebrate and invertebrate fauna.

State Forests comprise less than one fifth of native forest areas in NSW, compared with more than one third being held in private control, and only 6% reserved in National Parks.

The achievement of the proper care and management of State Forests will not entirely resolve the conflicts between the conservation and exploitation of forest resources. However, it will make a very important contribution insofar as:

- (i) Areas known to be of unique, rare or representative significance, whose natural values are incompatible with active forestry practices, will be set aside as National Parks or Nature Reserves.
- (ii) The State Forests will be managed by reference to ecological as well as sustainable economic and social priorities.
- (iii) The State Forests will provide important models on which to base guidelines for the control or management of private forestry as well as other forests on public lands.

Because timber production has first priority under existing statutory provisions, the native forests in NSW have been degraded as a result of over exploitation, i.e. cutting the forest faster than it was growing. Native sawlog supplies are now in rapid decline resulting in belated pressure on sawmillers to accept lower quotas - a procedure which the Commission admits has led to political intervention to the detriment of the forest estate.

PRINCIPAL POLICY

The N.C.C. believes that properly managed forests are a living resource which can sustain both ecosystems and species as well as being used for the benefit of humans - so long as all forest life and natural values are considered.

The N.C.C. does not accept that the major emphasis should be on wood production; it believes that NSW forests have a multiplicity of uses and should be managed for:

- (1) Conservation of ecosystems and species
- (2) Protection of water quality and soil
- (3) Wood for human use
- (4) Recreation/Tourism

This policy rejects the slogan of "multiple use" in favour of a system of zoning, believing that some of our forests should be managed with wood production as the prime objective (paying regard however to non-wood values), some with wood production as a secondary objective and some without any wood production at all. This latter concept is already acknowledged by the Commission in "Indigenous Forest Policy" which states that:

"if the dominant use lies in the field of scenic and nature conservation plus recreation or catchment protection, then management control and land title may be more appropriate to the National Parks and Wildlife Service".

Obviously the major part of the 3.55 million ha. of the native forests in NSW lacking specific conservation or recreational attributes, should be managed for the production of timber on the selective logging principle subject only to the reasonable needs of wildlife, soil erosion and water catchment protection, e.g. adequate streamside reserves, retention of habitat trees and revegetation where necessary. Some of the larger forests may lend themselves to internal zoning to provide for two or more of these four criteria.

SPECIFIC POLICIES

WOODCHIPPING

Woodchipping of our public forests should be confined to sawmill wastes and plantation thinnings. Integrated logging involving near or complete clearfelling is an unacceptable practice. The impact of integrated logging on the visual amenity, wildlife, soil and water quality, all of which are exemplified in the Eden woodchipping operation, are therefore rejected as inappropriate in a native forest.

PLANTATIONS

In order to reduce the demands on native forests, the N.C.C. supports the establishment of plantations of indigenous and exotic species provided that neither existing native forests nor woodlands are cleared for them.

SUSTAINED YIELD

Because it is based on a quantitative and not a qualitative criterion, and is not properly defined as to area, the N.C.C. rejects the widely used principle that the continuous volume yield of timber from a group of forests is a desirable policy. Sustained yield must be properly defined as it may well involve environmentally damaging forest practices.

IMPORTS

N.C.C. believes that it is immoral to import timber at the expense of the environment of other countries. Current areas of concern are tropical timbers from SE Asia such as Pacific maple (meranti) and Phillipine mahogany.

RESERVATION

Adequate samples of all forest ecosystems in NSW should be preserved as near as possible to their pristine condition. Large and representative areas should be in National Parks and Nature Reserves while smaller areas contained within particular forests should be protected as Flora Reserves with Management Plans which proscribe logging even with Ministerial consent.

Some major forest types not yet in secure tenure and requiring immediate protection are:-

(i) RAINFORESTS

Remaining areas under the control of the Forestry Commission which are not involved in the transition to hardwoods by the two veneer mills concerned should be either transferred to the N.P. & W.S. or gazetted as Flora Reserves depending on size, situation and sensitivity. Because the Forestry Commission's definition of rainforest is too restrictive, wet sclerophyll forests which have a predominantly rainforest over or under storey should not be logged. Urgent attention should be given to reservation of the remaining littoral and dry rainforest.

(ii) RIVER REDGUMS

Representative samples of Murray River redgums should be transferred to the control of the N.P. & W.S. NCC does not accept the contention that timber production objectives can be met while still maintaining the many other values of the forest.

(iii) FORESTS AND WOODLANDS ON THE WESTERN SLOPES

Due to the present underutilisation of cypress, ironbark and other forest associations of the Western Slopes, pressure for agricultural use of these areas is increasing. The N.C.C. believes that the Forestry Commission of NSW will be under pressure to relinquish parts of its estate on the Western Slopes. Comprehensive surveys should be made now so that major ecosystems can be conserved.

(iv) FORESTS AND WOODLANDS IN THE WESTERN DIVISION

Devastation of natural areas due to misuse by overstocking, rabbits and subsequent erosion have led to a regime which should not be tolerated and careful management is now needed so that the remaining portions of natural woodlands may recover and adequate samples of representative areas be preserved.

(v) RIVERINE FORESTS AND WOODLANDS

Significant stands of native vegetation bordering perennial and non-perennial watercourses should be preserved from logging and clearing.

STATE FOREST MANAGEMENT PLANS

- a) Ecological priorities should be identified as well as the economic and social values. One community should not be expanded at the cost of other communities unless this is demonstrably the natural condition of the forest complex.
- b) The present minimal public participation involving only local government authorities is unacceptable to the N.C.C. and should be expanded by legislative changes to provide for consultation with conservation organisations and local citizens. All draft management plans should be public documents and no action should be taken to implement a management plan until all conflicts have been resolved.

ROYALTIES

The N.C.C. believes that royalties should be sufficiently high to cover all appropriate Commission expenditure including re-establishment but excluding costs associated with conservation, recreation and statutory ministerial liaison. Interest on capital invested by the Government, not currently acknowledged as applicable, should become a notional item of expenditure for purposes of royalty calculation.

TAXATION

The N.C.C. advocates that both State and Federal Governments should discontinue fiscal measures which may stimulate the clearing of native vegetation on privately owned land and provide fiscal incentives designed to promote afforestation and retention of native vegetation.

HABITAT PROTECTION

The N.C.C. believes that native vegetation should be retained wherever possible beside streams and on all lands used for agriculture and pastoralism. Denuded areas should be revegetated with locally indigenous species in cases of unavoidable destruction eg. road widening.

WESTERN DIVISION

All applications for clearance of vegetation in the Western Division should be subject to rigorous examination. An E.I.S. should be prepared for major clearing proposals on those areas of extreme erodibility or habitats of vulnerable species.

ENVIRONMENTAL IMPACT

Despite considerable community interest in the management of State forests over the past 20 years, the Commission has shown a marked reluctance to consult with the public. An Environmental Impact Statement should be prepared and placed on public exhibition where there is likely to be a significant environmental effect. The N.C.C. advocates the further use of Conservation Orders by the NSW Heritage Council. An S.E.P.P. should be prepared by the Department of Environment and Planning to protect forests and woodlands on private lands.

NATIONAL ESTATE

The N.C.C. believes that rainforest areas listed by the Australian Heritage Commission on the Register or Interim Register of the National Estate should not be logged and other registered forests should not be subject to clear felling. Forests listed on the National Estate Register with high nature, soil or water conservation values should also remain unlogged.

REVIEW OF FOREST ESTATE

In addition to the foregoing there is an overall need for a reassessment of state forests by means of public inquiries. Consideration should be given to reclassifying as national parks, nature reserves or flora reserves those forests which are important for maintaining gene pools, endangered species, wildlife, wilderness and recreation.

Environment Groups'
**Statement on Employment
in Forest Industries**

PREAMBLE

1. **FORESTS AND JOBS : THE CURRENT SITUATION.**
2. **FOREST INDUSTRY DEVELOPMENT
AND FOREST MANAGEMENT**
3. **WAGES, CONDITIONS AND LIVING STANDARDS**
4. **SAFETY**
5. **WORKER PARTICIPATION**
6. **TRAINING AND EQUAL OPPORTUNITY**
7. **UNIONISATION**
8. **WOODCHIPPING AND WOODCHIP EXPORTS**
9. **MULTIPLE USE**
10. **CONSERVATION, EMPLOYMENT AND THE
ENVIRONMENT**

The Statement on Employment in Forest Industries has been written to provide a basis for exploring common policies and strategies with the union movement, with regard to forest-based Industries.

The Statement is based on the recognition that the central concern of the environment movement is to ensure the present and future well-being of people and other living things through the establishment of an equitable and environmentally sustainable society.

It believes that an economy which is environmentally sensitive provides ample scope for socially beneficial and sustainable employment.

The environment movement has a responsibility to consider the employment implications of its policies.

It supports the maintenance and generation of secure, longterm jobs in those areas of employment which do not conflict with the broad aims of the environment movement.

Equally, the environment movement supports the creation of employment, appropriate to the skills and needs of those displaced, to replace environmentally unsustainable jobs lost as a result of conservation concerns.

The environment movement recognises that the central concern of the union movement is to maintain and improve the living standards and working conditions of workers and their dependents.

We call on the union movement to actively consider the environmental implication of its various policies.

This Statement has been endorsed by the following Conservation organisations and groups :

1 FORESTS AND JOBS : THE CURRENT SITUATION

The environment movement recognises that unregulated market forces are bad both for workers and the environment. In the case of forests and forest-based industries, it recognises that :

- Native forests and the security of jobs in forest-based industries are dependent on the ecological sustainability of these forests. Both are threatened by overcutting and poor environmental standards of logging.
- Technological changes have led to major job losses in the timber industry. They have also led to an accelerated rate of exploitation and the destruction of native forests for profit and to cover these new capital costs.
- The low rate of utilisation of harvested timber contributes to overcutting and job loss.
- The contract payment system can be used to underpay bushworkers. It contributes to poor implementation of environmental standards because workers are paid only for the logs they produce and not for time spent on the implementation of environmental standards.
- The export of hardwood chips has greatly increased the rate of exploitation of our forests. We are clearfelling our forest heritage and exporting manufacturing jobs to Japan.
- The full costs of infrastructural development and environmental restoration are not being recovered from the timber industry. These represent a high rate of hidden subsidy which could be otherwise used to provide more employment in forest-based industries.
- State and Federal Governments, and State Forest services have played an inadequate role in the management of the forest resource. This has led to the present situation where private companies and timber industry interests dominate decision-making with regard to forest resources, and where environmental values have been displaced in favour of narrow economic interests.

The environment movement emphasises that the application of better environmental standards in forest-based industries can generate more jobs, throughout those industries and in those areas of employment dependent on them.

2 FOREST INDUSTRY DEVELOPMENT AND FOREST MANAGEMENT

The environment movement considers that there is much scope for the development of forest-based industries in ways which **stop the loss of jobs and the erosion of working conditions and improve standards of environmental protection.**

The environment movement supports the development of a **national forest industry plan** with these two major aims.

The environment movement sees the development of such a plan as the joint responsibility of the environment movement, unions, Government and forest industry companies. It sees the Plan's development as essential to the rational overall management of Australia's timber resource and the conservation of its forests.

Job losses can be stopped and current employment levels secured by :

- using environmentally sensitive and appropriate methods of resource management to ensure a sustainable longterm yield in areas utilised for hardwood production.
- encouraging the processing of forest products to the highest level of value-added, within Australia.
- by encouraging the highest possible rate of recovery of sawn timber throughout the processes of logging and milling.
- through ensuring that harvested timber is used for the purpose for which it is best suited, by improving the systems used for allocating wood between different companies and different end-uses.
- establishing hardwood plantations on already-cleared land near existing mills, in order to provide ongoing work close to towns with adequate social services and to reduce the pressure to continue clearing native forest.
- diversifying training and employment opportunities, and improving research, in all forest-related industries.
- increasing the efficiency and sensitivity of resource planning and management through the application of detailed forest management techniques at the level of individual stands of timber.

Protection of the forest environment can be improved by :

- identifying environmentally significant areas of forest, and reserving them from logging,
- significantly improving environmental standards in areas used for timber production to ensure that the yield is sustainable, while still guaranteeing the longterm maintenance of viable populations of forest-dependent species and the protection of soil, water and landscape values.
- significantly improving the implementation of environmental standards, including ensuring that workers are paid to limit damage to the environment caused by logging operations and also to carry out environmental restoration work,
- the creation of legislation which underwrites these standards and provides appropriate remedies against those companies which breach them.

The environment movement proposes that all members of the community, including environment groups and unions, participate in the **management** of forests used for timber production.

It sees the need for the application of a detailed **Code of Forest Management** which is legislatively enforced. This Code should spell out the day-to-day practice which an environmentally sound and economically viable timber industry must employ.

Decisions relating to forest management must be based on a full recognition of their environmental, social and economic impact. A sophisticated and up-to-date data base covering relevant environmental and resource information, as well as social and economic values, must be created to enable effective forward planning to occur. This information must be readily available to the public.

3 WAGES, CONDITIONS AND LIVING STANDARDS

The environment movement considers that the forest industry companies should pay the full economic costs of the labour and resources they use. This means that they should :

- observe award wages and conditions for all workers in all sectors of the forest industries,
- pay workers to maintain and implement environmental standards,
- in small towns dependent on the forest industries, provide adequate housing with security of tenure, and also provide training and appropriate social services.
- pay sufficient royalties and licence fees for public investment in the industry (through expenditure on infrastructural costs such as forest management, environmental management and restoration, workforce training, social services, and research) to earn a positive rate of return. This is so that workers do not provide a hidden subsidy to the industry through taxation.

4 SAFETY

The environment movement considers the level of deaths and injuries among workers in the Timber Industry to be unacceptable. It supports the introduction of safer work practices and technologies at all levels of the industry.

The environment movement supports the right of workers to stop work, without threat to their employment, in conditions which are unsafe for them or the environment, until the cause of the unsafe conditions is eliminated.

5 WORKER PARTICIPATION

The environment movement supports the right of workers to participate fully in all decisions which affect their work and the products of their work. This includes those decisions which govern long term investment plans as well as those concerning the immediate working environment.

The environment movement opposes those technologies, work processes and products which serve to undermine the working conditions, security of employment or living conditions of those affected by them, or which are directly or indirectly damaging to the environment.

The environment movement is committed to the effective participation of workers, the union movement, the environment movement and the government in the evaluation of new technologies and work processes prior to their introduction in the workplace.

6 TRAINING AND EQUAL OPPORTUNITY

The environment movement supports the creation of training and retraining courses leading to the creation of safer and more environmentally sensitive work practices.

It supports the provision of training schemes which impart the skills and work experience required to make work in forest-based industries accessible to disadvantaged and minority groups.

The environment movement does not support the creation of training and work experience schemes as a panacea for the problem of unemployment, nor does it support schemes which will lead to the reduction or undermining of existing work conditions or wages for any group in the workforce.

7 UNIONISATION

The environment movement recognises that the unionisation of forest industry workers in all sectors is an important step toward improving the wages, working conditions and safety standards among forest industry workers.

It also sees unionisation can be a means for improving the living standards of workers and their dependents, and improving the implementation of environmental standards in the industry by securing payment for time spent on environmental restoration.

The environment movement sees the unionisation of the workforce as an important means of ensuring that the longterm interests of workers and the environment movement are met. For its part, it will encourage its paid employees to join the appropriate union, and encourage its various organisations to develop appropriate salary and wage scales and work conditions.

8 WOOD-CHIP EXPORTS

The environment movement opposes the harvesting of native forests for export woodchipping. It does so for environmental, economic and employment reasons.

The reasons for this include the following :

- the practice of clearfelling large areas of forest, associated with woodchipping schemes, is environmentally unacceptable, as are, the short rotations on which forests may be managed for pulpwood production. Such intensive exploitation has a serious and damaging effect on flora and fauna populations, soil nutrients and water quality.
- woodchipping occurs at the expense of the future of sawmilling jobs. This is because native forests and subsequent regrowth (where these have occurred) are clearfelled for woodchips before many of the trees have grown to sawlog size. It has also served to displace sawlogging operations from many areas suitable for the production of sawn timber.
- the export of woodchips generates very few jobs for the tonnage of wood exported because it is not processed in Australia. It leads to a vast over-utilisation of native forests for woodchip, rather than the creation of additional jobs through value-added local processing using less of our forest resource.
- large subsidies to the woodchip export industry, through State Forest services, transport systems and other infrastructural assistance, would be better directed toward domestic employment-generating industries.

9 MULTIPLE USE

The environment movement considers that the concept of multiple use has been misused by the forest industry companies and State Forest services in Australia.

The environment movement supports the original concept of 'multiple use', meaning that there should be multiple use of forests overall, but that each area can have an exclusive 'use', ranging from logging to wilderness.

This contrasts with the State Forest services' implementation of multiple use as a term meaning that every area has multiple uses, with the main use being logging.

10 CONSERVATION, EMPLOYMENT AND THE ENVIRONMENT

The environment movement supports the creation of employment in those areas of forest-based work which contribute to the conservation and the restoration of the environment. It supports the implementation of permanent work programmes to maintain National Parks and recreational reserves.

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COMMENTS ON THE
FINAL ENVIRONMENTAL IMPACT STATEMENT FOR THE EDEN (NSW)
EXPORT WOODCHIP OPERATION FOR THE PERIOD 1989-2009

DECEMBER - 1986

by

Australian Heritage Commission

February 1987

1.0 CONCLUSIONS

The Commission considers that the Final Environmental Impact Statement (FEIS) does not provide sufficient information on the environmental implications of renewing the export permit for the Eden woodchip operation over the period 1989-2009. Accordingly, the Commission believes that, on the basis of the information provided, it would not be prudent for the Commonwealth to make a decision to grant permits until further information is made available. In particular, the Commission points out:

- (a) There is a critical lack of information on the terrestrial and aquatic fauna and flora in the Woodchip Supply Area. FEIS demonstrates that the long term effects on fauna and flora of the proposed action are unknown. The FEIS also has not provided sufficient advice on:
 - . how forestry management will affect the National Estate places,
 - . changes to the NSW Forestry Commission's Eden Native Forest Management Plan, (1982) and the essentials of a management framework which will protect the National Estate places,
 - . relevant aspects of the woodchip proposal not covered in the draft EIS. (see AHC Responses to the draft environmental impact statement (DEIS) and the supplementary document to the DEIS (SDDEIS)).
- (b) The Commission considers that the FEIS gives clear evidence that National Estate values would be lost. Therefore the Commission considers that the granting of export permits to Harris-Daishowa (Australia) Pty Ltd to conduct forestry practices in the National Estate places would be imprudent.

The Commission is concerned that this FEIS:

- . demonstrates inadequate understanding or concern on the part of the proponent in relation to the national estate values.
 - . shows that from the available information on impacts, there will occur significant and permanent loss of national estate values.
- (c) The document also has failed to consider the potential impact of the proposal on European cultural sites and has inadequately assessed the potential impact on Aboriginal cultural sites.
 - (d) There is also an inadequate treatment of feasible and prudent alternatives. In particular the options for protecting the National Estate places have not been given adequate consideration. Moreover, the impact of the alternatives listed on the natural, cultural and social environment has not been considered.

(e) The Commission considers that the FEIS has overestimated the resources available for woodchip by:

- . misuse of a volume/mass conversion factor; this is equivalent to 7.4% of the total export volume
- . miscalculation of the quantity of resource in Victoria; this is equivalent of a minimum of 2% and a maximum of 12% of the export volume
- . not excluding the National Estate area or any other areas which either the NSW or Victorian governments may declare as National Parks.

The Commission also considers that there is a definite lack of scientific data available to make reasonable estimates about the volume of regrowth timbers which could make up the shortfall.

Unless other resources are available, the Commission estimates that there should be a reduction of 30-40% in the annual volume of woodchips exported. This would have the effect of reducing the export quota to the initial volume granted in the 1970 export licence.

The Commission therefore concludes that the final EIS does not satisfy the requirements of the Commonwealth Environment Protection (Impact of Proposals) Act 1974. In particular sections (e), (f) and (h) have not been adequately dealt with by the FEIS.

6.0 SUSTAINABILITY OF THE PROJECT

The Commission believes that the FEIS does not show that the proposal can sustain an annual export of 850,000 tonnes of woodchip from 1990-2009. As a result of the Commission's assessment of the resource available in Victoria and NSW, the Commission estimates that the export volumes should be reduced by at least 10%. In addition the export volumes should be reduced by a further 20-30% to account for National Estate exclusions and any National Parks which either the Victorian or NSW Governments declare. Therefore the total export volume should be reduced by 30-40% to a volume similar to the volume in the initial export licence granted in 1970.

The Commission considers the proposed export tonnage of 850,000 tpa would place considerable pressure on the NSWFC and HDA to intensively harvest the National Estate places. It could also preclude any plans to increase conservation measures in management plans and to significantly increase the area of reserves in the region.

This proposal is not sustainable for exporting woodchip at the current volume of 850,000 tpa for the following reasons:

6.1 MISUSE OF CONVERSION FACTOR

The FEIS has misused the volume to mass conversion factor. On page 5.8 of the FEIS the suggested average annual increment of $3\text{m}^3/\text{ha}$ for regrowth is given as equivalent to 3.405 tonnes/ha. However the DEIS (Appendices, p.1) and the Eden Native Forest Management Plan (p. 30) state that the volume to mass conversion factor is 1.135 m^3 per tonne. Therefore, the average annual increment for regrowth should be 2.643 tonnes/ha.

The FEIS calculates in Fig. 5.2 (p. 5.11 and p. 5.8) that 200,000 ha of productive forest produces 680,000 tonnes/annum of resource by using the incorrect conversion factor of 3.405 tonnes/ha. The correct volume is 530,000 tonnes/annum of resource. This includes sawlog resources. If sawlog resources are excluded from the total resource, only 467,000 tonnes per annum of pulpwood resource are available.

On this basis the present pulpwood cut of 530,000 tonnes/annum from the old growth forests is not sustainable in the regrowth forests of the ENFMA. This is a fundamental mistake in the FEIS.

Error in the resource estimate = 63,000 t.p.a.

This represents 7.4% of the total export volume and 11.9% of the export volume from ENFMA.

6.2 ESTIMATED PULPWOOD RESOURCES - EAST GIPPSLAND

The Commission queries the estimated pulpwood supplies from East

Gippsland for both private property and sawmill residues. The DEIS anticipates 141,500 tpa of pulpwood supplies (i.e. 16.5% of the total woodchip export licence) to be supplied from East Gippsland. However, this volume is not assured and is based on a number of errors and assumptions which may not be valid.

Since the DEIS, the Victorian Government has expressed its concern about the impact of the proposal on private land. As a result it has called for an Environmental Effects Statements (EES) to be prepared by HDA. The Commission understands that this study will be completed by mid 1987. The recommendations of this study may reduce the area of the land available for integrated harvesting and hence reduce the pulpwood resource available from Victoria.

The Commission considers that this assessment of the environmental impact of the proposal on private land is critical, particularly in the light of the recent statement by the Victorian Land Conservation Council in its final recommendations of the East Gippsland Review (December 1986).

It notes that:

"considerable pulpwood harvesting is taking place on freehold land within the Mallacoota Inlet catchments and this is likely to be affecting water quality and sediment loads" (p. 91).

The Victorian government is also preparing a Code of Forest Practices for both private and public land which may exclude some private lands in East Gippsland from integrated harvesting.

Therefore, the Commission considers that the assumptions made in the FEIS concerning the quantity of resource on Victorian private land which could be available, has been overestimated. There have been no assurances from the Victorian Government that the anticipated volume will be available.

6.2.1 Miscalculation

At the time of the preparation of the DEIS and the FEIS, the LCC final recommendations were not available. It appears that the consultants calculated the expected sawmill residue (i.e. 80,000 tpa) on potential sawlog yield of 220,000 tpa from East Gippsland. The assumption was that no new parks will be declared in the area and that intensive forest harvesting operations were permitted. However, the LCC final recommendation was for a reduction in level of cut to 171,000 tpa and substantial parks to be declared in both Errinundra Plateau and Rodger River. The sawlog residue yield resulting from these final recommendation is now reduced to about 65,000 tpa.

An assumption within these calculations is that harvesting will occur. However, the Victorian government has not committed itself to such a course of action and will not until after its assessment of the Environmental Effects Statement on the Value Added Utilization Scheme (VAUS). If no integrated harvesting occurs then the quantity of sawmill

residue available would be much less i.e. approximately 36,500 tpa (sawlog cut reduced to 98,000 tpa).

Other major assumptions made which may affect the reliability of the resource estimates are that the outcome of the EES on private lands will be favourable to integrated harvesting and that the rate at which the DEIS anticipates clearing of private land will actually occur.

6.2.2 Three Likely Scenarios

There are three likely scenarios for the supply of export woodchips from Victoria. These are:

	Expected Vol. private property (t.p.a.)	Expected Vol. public land (t.p.a.)	Total (t.p.a.)	Resultant reduction to export volume (t.p.a.)
. Integrated harvesting on both private land and public land taking into account LCC recommendations	61,500	65,000	126,500*	15,000
. No integrated harvesting - on private land		65,000	65,000	76,500
. No integrated harvesting - on private or on public lands. (sawmill waste only from reduced annual cut)		36,500	36,500	105,000

* The total expected export volume in the DEIS = 141,500 t.p.a.

There is no guarantee, at this stage that the Victorian government will allow integrated harvesting on both private and public lands. If a decision was made not to allow integrated harvesting the annual export woodchip volume could be reduced by up to 12% i.e. 105,000 tpa.

Maximum possible reduction in resource estimate = 105,000 tpa. This represents 12% of the total export volume.

Minimum reduction in resource estimate = 15,000 tpa. This represents 2% of the total export volume.

6.3 EXCLUSION OF NATIONAL ESTATE PLACES

6.3.1 Loss of National Estate Values

The Commission is concerned that the outcome of proposed intensive forest harvesting practices on non-wood values is still unknown. National Estate values of mature and old growth forests will be