## **Timber Workers for Forests (Inc)**

## Submission to the Forestry Tasmania Draft Forest Management Plan 2008-2017

**1.7 Carbon Sequestration** (page 21) It is revealing to note that barely a page and a half of this entire draft Forest Management Plan is dedicated to carbon sequestration and that carbon trading is not even mentioned. This despite the fact that the Australian Government has now signed the Kyoto Protocol.

While Figure 10 (p21) clearly indicates that a relatively high proportion of the carbon in our "forest estate" is stored in the soil and debris no information is supplied about the levels of carbon stored in different types of forest.

It is known that mature and old growth forest store the largest proportion of carbon and that most of is released when these are clearfelled and that only a relatively small proportion is replenished by the short rotation regrowth forest that takes its place. Most of the timber in mature mixed forest, when clear felled, is not converted into durable wood products. Only a very small percentage is actually used as sawn timber or converted into other building products such as plywood and chipboard. The majority is actually burnt or decomposes in the coupe. The bulk of that which is harvested is pulped for short term use as toilet paper, cardboard boxes or other paper products and soon goes to landfill or the equivalent. Burning in a controlled environment (for generation of electricity) might be better than open burning from a particulate pollution perspective it is certainly not carbon storage though it might save on energy use from other sources.

At the recent "Old Forests - New Management" conference (Hobart, February 2008), Dr. Jerry Franklin (Professor of Ecosystem Science at the University of Washington's College of Forest Resources), made it abundantly clear that climate change is no longer something we can afford to talk about speculatively and that carbon sequestration in mature forest is something that responsible Forest Managers must put front and centre. Not only for environmental considerations but also for financial reasons.

TWFF notes that the issue of 'carbon trading' is completely missing from the draft FMP and suggests that this is a serious omission. We suggest that 'carbon sequestration' and 'carbon trading' should be addressed in considerable detail in the final FT Forest Management Plan and that a clear indication of that the amounts of carbon stored in old growth forest, mature mixed native forest, regrowth forest and plantations should be clearly detailed.

TWFF also suggests that strategies that maximise carbon sequestration and the potential economic return from carbon trading be developed and detailed in the FMP.

**2.1 Sustainable Yield** (page 23) The statement that FT "sustainably harvests at least 300,000 cubic metres of high quality sawlogs annually" is highly questionable. FT defines "the sustainable yield of a forest" as " the level of commercial timber (or product mix) that can be maintained under a given management regime without reducing the long-term productive capacity of the forest". This might, at first glance, seem reasonable.

In Professor David Lindenmayer's book: "On Borrowed Time. Australia's environmental crisis and what we must do about it" he points out that: "There are many definitions of 'ecologically sustainable resource management'. Indeed the term 'sustainability' has been so widely used and abused that it is regarded by many as a 'weasel word', bereft of true meaning. It has been used to mean virtually all things to all people. Ecological sustainability doesn't mean the same thing as 'sustained production.'

For example there might be a sustained yield of timber from a forest region (say 300,000 m<sup>3</sup> per year) but if the timber extraction is poorly managed it is not considered 'ecologically sustainable' as it has the potential to seriously damage the environment. The best way to illustrate 'ecologically sustainable' sustainable' resource management is to define it for a particular sector. Forestry provides an example. 'Ecologically sustainable' forest management involves 'perpetuating ecosystem integrity

while continuing to provide wood and non-wood values; where ecosystem integrity means the maintenance of forest structure, species composition, and the rate of ecological processes and functions within the bounds of normal disturbance regimes."

Further down the same page we are told that " *sustainable yield calculations are based on ensuring the present standing volume is maintained at the end of the calculation period – usually 90 years*"

**2.2.1** *"Clearfelling is used for wet eucalypt forests with tall dense understoreys"* (page 25) Nominally this is for the harvest of Eucalypt sawlogs with the bulk of the timber described as *"arisings"*. These including Myrtle, Sassafras, Celery Top Pine (often immature and virtually unusable as sawn timber) and others are then burnt, pulped or sold at derisory prices as the relatively small demand cannot support the glut. By far the bulk of the harvested timber is actually chipped.

When TWFF audited the clearfelled Coupe74D (EPO74D) we were shocked to discover that only "26% of the total timber in the coupe was harvested during clearfelling. 51% of the eucalypt was extracted by contracotors and just 1% of the special species timbers" Logging Coupe Inventory – Graham Green 2002 – ( http://www.twff.org.au/epo74d.pdf\_). After 'regeneration burning' substantial scorched Myrtle logs were exposed that had been buried deep in windrows. We estimated that some 998 tonnes of timber per hectare was wasted.

The regrowth forest may 'regenerate' for 90 years before the same happens again though this time it is probable that the *"stands of even-aged regrowth are thinned, typically at ages 25-40 years to concentrate stands growth on fewer stems so that the nominal rotation length can be reduced to about 65 years"*. Eventually the slow growing 'minor' species will be lost completely from the production areas of our native forests as they are turned into.

Aggregated or variable retention harvesting has shown itself to have serious problems associated with it. The small "islands of biodiversity" that are left in what is essentially a clearfell are vulnerable to scorching in the ensuing "regeneration burns" and wind damage and seem unlikely to fulfill their role in ensuring genetic biodiversity.

TWFF considers that to describe these practices as "sustainable forest management" is, at the very least, misleading. Even the term "sustainable yield" ignores the deterioration in quality of the Euacalypt sawlogs being grown in regrowth forest and the elimination of minor species.

TWFF suggests that FT should only use the term "sustainable forest management" to describe practices that are "ecologically sustainable". That is: management practices that perpetuate ecosystem integrity while continuing to provide wood and non-wood values; where 'ecosystem integrity' means the maintenance of forest structure, species composition, and the rate of ecological processes and functions within the bounds of normal disturbance regimes.

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