



Submission to the Victorian Environmental Assessment
Council's
River Red Gum Forests Investigation Draft Proposals Paper

October 2007



The United Nations Conference on Environment and Development,
Rio de Janeiro from 3 to 14 June 1992,
Principle 1

Human beings are at the centre of concerns for sustainable development.
They are entitled to a healthy and productive life in harmony with nature.

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Timber Communities Australia is the peak national grassroots community support group for those that depend upon our sustainable forest based industries. Supporting and representing rural communities and their people, who rely to varying degrees on timber and timber products for their viability

TCA is proud of our 13,000 strong membership database and openly acknowledge that we not only support our membership but the wider rural community through our extensive national branch network.

Our members represent forest growers (native and plantation), millers, forest harvesting and haulage contractors, forest nurseries and most importantly their staff and families. In addition our membership represents the broader community including doctors and hospital staff, teachers and local schools, family businesses and people who are supported by the flow on effects that arise from a vibrant, healthy and wealth creating forest sector.

Nationally TCA has 82 branches throughout Australia with 14 Branches in Victoria. Timber Communities Australia believes that through proper management of resources based on sound scientific reasoning rural towns reliant on forest generated industries can achieve prosperous economies and sustainable futures for generations to come

Since the release of the draft report in July there has been a groundswell of community outrage with VEAC and their proposals. The scene was set when Chairman, Duncan Malcolm, made the statement that the needs of biodiversity outweighed the needs of communities.

What has followed since that day has been nothing short of amazing. All the different bush user groups united to become one voice. At the VEAC public consultation meetings an average crowd of 200 people gathered to make known their disapproval of VEAC recommendations. These culminated in some 500 protesters in Kerang sending a message loud and clear to the visiting Premier, Mr John Brumby, that rural communities have had a gutful of VEAC recommendations.

It should be evident to VEAC councillors that communities in the investigation area are against the formation of National Parks and would prefer to see active management that will allow for continuation of current forest practices.

Community Killers

Once again the timber industry will bear the brunt of VEAC recommendations. Once again, as seen in the Otways and Box and Ironbark forests, it will be the small towns that are destroyed and the death of industries that have sustained these towns for over 150 years..

The lack of thorough socio economic modelling raises the question of VEAC's credibility in delivering a balanced outcome. When making decisions that can have detrimental impacts, solid rationale and reasoning needs to be applied. The survey sheet used to determine socio economic modelling was only 2 pages long and given to employers only. It has not contained questions relating to families, school numbers or expenditure.

VEAC have only touched on the socio economic impacts to timber communities in the draft proposals paper. The full socio economic report reads quite differently.

At an individual level there is also a range of potential impacts of the loss of employment for individuals and their families including poverty and financial hardship, reduced future work opportunities, reduced participation in mainstream community life, family relationship strains, and intergenerational welfare dependency

The above statement is on page 85 of the RRG draft proposals report Below is the rest of the statement that is only in the full Socio economic report

There may also be psychological difficulties that can cause a great deal of distress to sufferers and their families; prevent a return to work; and be costly to the community Prolonged unemployment can also generate a range of personal and social problems including increased drug and alcohol dependency and increased demand for health services.

These sorts of stresses should not be tolerated in modern society and no organisation or government has the right to inflict these on rural communities. TCA through its past involvement in the Otways and Box/ironbark VEAC process has seen firsthand the devastation to rural communities that suffer VEAC investigation processes.

In both these areas communities are still trying to recover. The reductions enforced on the timber industry have flowed through to communities. The predictions of increased tourism visitation have not eventuated. Many families have been forced to relocate trying to seek employment opportunities. In both these areas only directly affected businesses were compensated (nowhere near enough) with the flow on business left with no assistance.

A graphic illustration on what happens to communities when important rural industries are impacted on is the Swifts Creek scenario. In this circumstance the local sawmill providing the majority of the town's employment closed. In the ensuing months domestic violence escalated, suicides occurred and several local businesses shut their doors. Thankfully, through government intervention and a willing business partner the mill has reopened and the town is flourishing again.

There have been numerous media reports on the effects of the drought in relation to mental health issues. To take away more hope for the future as VEAC recommendations do could see people pushed to breaking point.

TCA is extremely frustrated with VEAC treatment of community impacts. Over the course of the investigation TCA along with other organisations have reminded VEAC of the shortcomings of their assessment. VEAC have failed to acknowledge that existing social cultural, environmental and economic benefits of multiple use forest management contributes to society. These benefits have been pointed out to VEAC yet they have chosen not to factor them into the socio economic report

'Approximately 60% of the benefits of VEAC's draft recommendations are enjoyed by people in Melbourne while only 5% accrue to the study area. In contrast, most of the costs of the draft recommendations are incurred by those living in the study area.'p82

Why should red gum communities be punished to make people in Melbourne feel good about the environment. VEAC have chosen to use choice modelling to come up with monetary values for biodiversity.

TCA questions the validity of this modelling as it is easy to say you would pay for something that is a perceived value when you know the money will never come out of your pocket. If someone went and physically asked for financial contributions the response would be quite different

TCA believes information given to participants in the choice modelling survey was presented in such a way as to influence a desired outcome. There was no information on the adverse effects to the community only information on improving environmental values. There was no comparison between flora and fauna numbers in national parks and state forests making it impossible for respondents to make informed decisions.

TCA believes VEAC should be held accountable for their proposals. The community reflect this view. The situation was best summed up when VEAC chairman, Duncan Malcolm was questioned by Trent Swan, a member of a 6th generation Barmah family. Trent gave an insight to his family's relationship with the forest and the strong cultural links they have with the area. He asked Mr Malcolm if in 5 years time if VEAC got it all wrong would VEAC take responsibility for their mistake. The response from Mr Malcolm was that Trent's question was ridiculous as no one can look into the future and VEAC wouldn't be accountable. Trent responded in typical rural fashion explaining how he had been brought up to take responsibility for his actions. VEAC do not understand this concept.

Before VEAC puts forward its final recommendations TCA would like to see

- 1: Thorough socio economic modelling, such as that undertaken for East Gippsland to assist government in assessing VEAC proposals. Modelling should also be undertaken to ascertain the socio economic impacts of any activity that is going to be negatively affected. These include camping/tourism, hunting, fishing, farming and cattle grazing as well as the timber industry.
- 2: Full understanding of the flow on effects to other business and communities need to be ascertained. VEAC have only calculated economic impacts and have not factored in impacts to schools, volunteer organisations, service clubs and health services etc. The multiplier that most economists use to determine flow on is 3 or 4X. VEAC has only used a 2X multiplier and grossly under estimated socio economic impacts.
- 3: That a review of VEAC recommendations in other areas be undertaken to determine if the predicted benefits are taking place. These should include impacts on affected communities as well as determining if expected biodiversity improvements are occurring.
- 4: That decisions that have been made using choice modelling be put on the scrap heap and a more thorough and robust system be used to determine best outcomes. TCA believes choice modelling is too open to influences and not reflective of real impacts.
- 5: That mental health issues be given consideration in decision making process. VEAC recommendations contradict government positions in relation to rural communities and drought stresses. At a government run forum into rural communities and climate change it was put forward that the best way to avoid mental health issues was to provide employment opportunities and active community participation. VEAC recommendations will deny this.

To Lock it up or Leave it

Why is it that whenever a report on land management is published the timber industry is set up as the fall guy? VEAC have not produced evidence of adverse effects of timber harvesting and recognise **'that there is a real possibility that the riverine forests and wetlands will not survive unless the under flooding is addressed.'**p8

If lack of water is the problem what does locking up forests and excluding forest users achieve? In times of drought isn't it better to utilise commercial timber thinning programs to thin the forests and reduce competition amongst trees. Simple logic dictates that less competition means more water for remaining trees. Active forest management, particularly in red gum forests is a better tool than lock up methods. **'Changes to public land use categories alone will do virtually nothing to avert this problem (lack of water). Increased reserve system protection must be underpinned by more water reaching wetlands and floodplain forests'**. P10

TCA believes VEAC have gone for a land grab for parks. Page 8 states **'in constructing the proposed conservation reserve system, VEAC has endeavoured to consolidate and improve public land connections between habitats'**. Green groups have been proposing this corridor system for many years and in some cases such as East Gippsland has cost hundreds of jobs by the unnecessary creation of transit reserves. Wildlife does not discriminate in which type of forest it lives. Indeed there is strong evidence to suggest in areas of forest disturbance the frequency of endangered species is higher than in National Parks. Should we be returning National Parks to State forest to help biodiversity rather than the other way around?

It should also be pointed out that on the 28th February 2007, the Scientific Advisory Committee, reporting to the Minister for Environment, gave its final recommendations for listing of River Red Gum as a threatened species under the Flora and Fauna Guarantee Act 1988. This expert panel rejected the nomination, because the listing did not satisfy any of the criteria.

VEAC have also given little recognition to the dynamics of Redgum forests. Under current drought conditions the whole of the forest estate is vastly different to what it would be in wetter conditions. Many of the rare and threatened ECV would change rapidly with rain and well meant but ill conceived protection measures would not be necessary.

Also alarming is the statement **'It was assumed that additional management costs for public land areas, including new national park, would be 3 million'**p80. A report based on assumptions and not fact is very dangerous. To put a pie in the sky figure on park management is irresponsible and research should have been done to quantify this figure.

VEAC proposals to increase fuel loads on the forest floor are nothing short of ludicrous. VEAC suggests that levels be a minimum 50 tonnes per hectare. They estimate that pre European loads were 125 tonnes per hectare. This somewhat dubious figure doesn't seem to take into account flooding regimes that remove much of the forest litter. This amount of debris would result in a mega fire in the red gum forests, destroying them forever. By increasing fuel loads VEAC would inadvertently be placing biodiversity values they sought to protect in greater danger due to extra fire risk their recommendations would create.

Add to this the reluctance of CFA volunteers to place their lives in an unnecessary risk situation and red gum forests could be left to burn. For the sake of the forest management regimes involving active management would improve and protect forest health.

TCA believes that the following points need to be addressed before the final report is completed

1: VEAC acknowledge that water reforms underpin the bulk of the report. With water no longer on the table VEAC need to go back to the drawing board and revise many of its recommendations.

2 : That VEAC need to explain and demonstrate why traditional industries, such as timber and grazing are such threatening processes and needed to be reduced when VEAC openly admit that lack of water is the most threatening process for Redgum forests

3: That further research needs to be undertaken to quantify flora and fauna numbers in both national parks and state forest. Taking this further TCA believes that research needs to be done to investigate the relationship between forest disturbance and biodiversity values being that in most forest investigations rare and threatened species occur in areas of past disturbance.

4: The costs of national parks need to be weighed against the values of state forest. This needs to look into revenue created by both land tenures, including all commercial operations. Biodiversity values also need to be determined to see which land tenure produces the higher value. This also needs to compare costs on maintaining national parks opposed to costs for state forest.

The Great Divide

There is a great deal of debate within local communities as to VEAC recommendations regarding indigenous communities. This is creating an undercurrent of mistrust and ill feeling between people that have lived with each other for many years.

Giving any group exclusive rights will divide communities and it is felt that VEAC recommendations will create a racist divide, turning neighbour against neighbour. There have been countless hours of time and effort between indigenous and bush user groups to progress and solve many local issues and reach a better understanding between the groups. VEAC proposals will destroy this good work.

TCA understands what VEAC are trying to achieve and supports indigenous involvement but it cannot be at the expense of the whole community or by creating a divide between communities that have co-existed for many years.

TCA is currently working on an indigenous forestry program that once established, will be able to be utilised by all indigenous communities. The majority of the program is based on state forest activities and would be impeded if more national parks are created. Looking forwards TCA believes there is great opportunity to work with peoples such as the Bangerang Community, who want to provide opportunities for indigenous youth.

Can't see the forest for the trees

90 Jobs being lost is only worthy of mention on a couple of pages. There is a noticeable lack of information, within the report, regarding the timber industry and its contributions to local communities. The draft proposals document has been poorly laid out requiring a magnifying glass to reveal many of VEAC's proposals.

VEAC have not seen fit to give the timber industry a specific number of pages in the recommendation section of the report. Being one of the most important industries in the region, and an industry where most jobs are to be shed, TCA would like to know why VEAC has downplayed the importance of the timber industry

The Mid Murray management plan has only been implemented recently and included stakeholder participation to deliver a working forest plan. This should have been utilised more widely and many of its principles applied to VEAC's draft recommendations to deliver a more balanced outcome.

VEAC have made no mention of the huge advances in technology that are allowing better utilisation of red gum timber. Better harvesting methods and sawmilling techniques means that fewer trees are being harvested and more products being produced from logs. To be more economically efficient and environmentally friendly the industry has gone through self regulation and adjustment.

The Redgum timber industry is sawlog driven. Timber is used to produce a range of products from fine furniture, veneer panels and construction materials. The innovation of the industry should be applauded as they have developed uses for all the off cut material with nothing being wasted and even sawdust being burnt to produce energy.

Redgum timber is a valued timber not only in Australia but on the global scale. Its unique colouring and amazing durability contribute to the popularity of this amazing timber. There is no ready replacement for Redgum. It has not been grown in plantations with growing conditions required to achieve good growth almost impossible to duplicate, making Redgum plantations an unviable option. Even if plantations were successful it would be almost 50 years before sawlogs would be available. Add to this scenario the opposition of groups such as FOE, TWIS and the Greens to plantation development and the option of going to plantations is just a furphy. All of the mentioned groups have called for plantation development in trade off for reservation expansion. Now they have achieved the desired results they are attacking plantation development and wanting established plantations reserved because of high biodiversity values. This highlights the fact that these environment groups will never be satisfied and not trusted.

In the Otways and the box/ironbark forest, after all the pain the communities have suffered and the thousands of hectares locked up environment groups still want to lock more forest up. They don't want a balance, they don't want any trees to be harvested, they want the forest for themselves and the rest of us can live in poverty.

The continued push to lock up forests from the environmental movement is not only socially irresponsible but environmentally damaging. For every hectare of forest we reserve from sustainable, legal and heavily regulated commercial harvesting in Australia we place double the amount in jeopardy in poorly managed third world forests. VEAC should consider the global ramifications of its locking up strategies.

VEAC has also been grossly negligent in valuing of the timber industry. They talk about the effects of climate change yet fail to weigh up the benefits of sustainable forestry in tackling the issue. The question of carbon sequestration has not been raised and leaves TCA wondering if this was a deliberate tactic by VEAC due to research showing that sustainable forestry is a cost benefit to the environment.

Figures quoted in the report are somewhat perplexing. **P.72 VEAC's proposed recommendations would reduce the net economic contribution of the timber industry to the Victorian economy from \$2.5 million per annum to \$0.5 million.**

Unless you look further you would think that the industry plays a small role in the investigation area. When you get to page 83 you discover that the industry creates over \$20 million in expenditure in the region. Reading the full socio economic report there is annually \$98.31 million direct timber related created revenue. These figures also raise the question of how thorough the socio economic research has been or why weren't they made more public knowledge rather than burying them in a document. Adding strength to this argument is that the socio economic modelling has only looked at flow on businesses and not considered impacts on groups such as teachers, health services and shires to when incomes are reduced and families move to find employment.

TCA has seen schools closed, police stations closed, doctors and chemists closing all because of locking up forest without proper understanding of impacts.

There is a huge bias against timber production in native forests particularly in the Melbourne metropolis and some key regional centres. Quite apart from "pure" economic theory and practice, the use of Choice Modelling is inappropriate because of the bias implanted in the general community as a result of the relentless campaign of green groups pedalling misinformation. It is just not possible to obtain an unbiased response even under the most rigorous development of the choice questions to minimise such bias.

The implications for firewood collection on a domestic and commercial scale is very significant to regional communities. **P72 The burning of firewood for heating and cooking is generally an inefficient energy source that generates high level of wood smoke. Some reduction in its use—and the continuing roll out of the natural gas network – would be desirable.**

The previous quote is straight from the green bible. There have been vast improvements in technology over the last decade for wood heaters and ovens. Today's heaters burn less wood, generate heat more efficiently and produce minimal emissions. Research has been undertaken that proves that in rural areas wood burning for energy and heat is the most efficient and environmentally friendly method.

Gas was promised to townships in the Box/Ironbark investigation area 6 years ago. The communities are still waiting for gas. It has yet to get past the outer suburbs of Melbourne. To even suggest that natural gas is a replacement energy shows how out of touch with rural Victoria the VEAC councillors are.

The other issue that has been highlighted with firewood regulation is firewood theft. Since the Box/ironbark final report, which led to the reduction of commercial firewood cutters, firewood theft has become a threatening process for forest biodiversity values. Commercial cutters operated under the code of forest practice and DSE supervision. This meant only trees conforming to harvesting prescriptions were felled

What is occurring now is many of the larger trees and hollow bearing trees that were left are being indiscriminately cut down by unlicensed and uneducated people, placing biodiversity values at risk. VEAC recommendations will make this happen in the Red Gum forests.

The other problem that occurred in the box/ironbark area is the distances people are forced to travel to collect firewood and the time period that wood can be collected. This regulating of firewood collection is making life extremely tough for many communities and forces people to act illegally through over regulation as many will risk getting wood closer to home rather than driving over 20kms from towns to get wood to stay warm.

TCA feels VEAC have been irresponsible with their reporting on the timber industry and believe the following points should be addressed before the final report is prepared.

1: VEAC needs to go back to the drawing board and calculate the carbon inputs and outputs of the forestry sector and equate the results into all of VEAC's modelling. With carbon credits set to become a tradeable commodity the value of trees could change the way that forests are managed

2: Consider the impacts on a global scale of stopping sustainable harvesting as practiced in the Red Gum forests and the resulting pressure on the public to source overseas replacements. This has not been factored in

3: Undertake more research into the impacts of firewood. There is evidence to show VEAC recommendations are not working in previous investigation areas and the full effects of VEAC's proposals into restricting firewood access needs to be given more consideration.

4: That if proposals re firewood are accepted then recommendations should be put forward to ensure that rural communities access to firewood should not change until a similar costing alternative energy source is made available.

Who's left?

VEAC have managed to inflict a negative impact on nearly every bush user group in the investigation area. In recreational terms there will be huge impacts. Restriction on activities tend to see people go elsewhere to pursue their pastimes, VEAC recommendations will ensure an exodus of campers, fishermen and hunters from the Redgum forests.

The removal of cattle will not solve the water problems. This myth that cattle are destroying the environment is utter nonsense. After 150 years of cattle being in the forest, using environmentalist's calculations, there shouldn't be anything but weeds and mud. Redgum forests are still richly diverse in flora and fauna and more recent land users have ensured the continued good forest management started by indigenous peoples who inhabited the area.

In the Daintree forest it is protectionist policies like VEAC are proposing that is placing this World Heritage area at risk. In their zest to save the environment, hunting was deemed environmentally damaging and excluded. This has effectively given sanctuary to thousands of feral pigs which are destroying this fragile ecosystem. VEAC recommendations could have the same effect on Redgum forests.

Duck hunting is also to be affected. the lack of recognition for the work that groups such as field and game have done in restoring wetlands and increasing bird numbers has been seen as of little importance to VEAC.

It is ironic that hunting groups that have helped the environment will now be punished and all their good work lost if VEAC do not reconsider their recommendations.

Impacts on recreational activities have not been quantified. Under VEAC recommendations camping will be heavily regulated and numbers reduced. This holiday alternative has been a generational family pastime and has become a major contributor to the local economy. Reduction in camping numbers will have an adverse affect on many business and communities and VEAC should have conducted modelling to investigate the impacts of their recommendations.

If it's not broken then don't fix it.

This saying is quite apt in terms of the VEAC process. Since the traditional owners started to manage the forest and in latter times European settlers the Redgum forests have adapted and survived. They have been subject to flood and fire and have survived. The current management system, as outlined in the mid Murray forest management plan has worked well and protected forest values. Giving regional DSE staff more resources to manage the forest is a better proposal than locking forest up and destroying rural communities. If VEAC listened more closely to local foresters and bush users and adopted many of the practical solutions these people put forward to help protect Redgum forests there would be little need for the thousands of submissions being presented to VEAC.

The current drought is impacting on the forest health and should not be used as a reason for excluding traditional activities, which, in the absence of flooding can be utilised to manage the forest. Creating National Parks will not create more water.

TCA believes that given VEAC has recognised that most of its recommendations are built around the forest receiving water and with water not available that VEAC's current recommendations be withdrawn, and, that a new study is undertaken by a balanced group for determining the future of the area. If this is unachievable then the points raised in previous pages need to be addressed before taking this process any further.

VEAC recommendations are based on a Melbourne view and reflect how out of touch with rural communities the organisation is. Redgum forests are model forests in their relationships with local communities. They have provided benefits for local communities including employment in industries including timber and tourism. They have high indigenous and cultural values and good forest management plans that reflect all values. The forests are functioning under this system and TCA believes there is no need to reinvent the wheel, in terms of current forest management, but just apply a little grease to make the wheel turn easier. VEAC need to remember principle 1 of the Rio earth summit and ensure that whatever it presents as their final proposals reflects the point below.

**Human beings are at the centre of concerns for sustainable development.
They are entitled to a healthy and productive life in harmony with nature.**

They haven't done this yet !!

If you require further information or wish to discuss any of the issues raised further please contact me on the numbers below.

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