*Interim:*

# VICTORIAN PLANTATION MANAGEMENT POSITION STATEMENT

(April 2001)

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# SECTION ONE
# Introduction

## 1. OBJECTIVES

The Victorian Plantation Management Reference Group affirms the following policy objectives adopted at the 1999 National Forest Summit:

- The forest movement condemns the clearing of native forests to establish plantations;
- The forest movement supports the utilisation of existing plantations to ease the pressure on native forests;
- The forest movement will actively encourage improvement in environmental management practices within those plantations;
- The forest movement will undertake research to identify limits to further establishment of industrial plantations;
- The forest movement opposes the export of unprocessed plantation logs;
- The forest movement opposes the intensification of native forest management.

We believe that these objectives can be achieved by strengthening planning controls, improving plantation management systems, requiring government and commercial accountability and ensuring that the global trading system does not compromise environmental objectives.

## 2. SCOPE AND USE OF THIS DOCUMENT

2.1. The principles outlined in this document aim to set a standard of environmentally sound management for plantations which is worlds-best-practice.

2.2. The principles in this document do not constitute a certification standard.

2.3. Support for the principles outlined in this document by environmental groups does not imply that native forest campaigners do not support the use of the existing plantation resource.

2.4. Implementation of these principles is intended to complement native forest conservation objectives.

2.5. We recognise that all agricultural production needs to shift to a socially and environmentally sustainable footing. In setting a high planning and environmental framework for plantations we are aiming to encourage the plantation sector to lead the way for the agricultural sector. We are aware that the applicability of these principles with regard to small-scale farm forestry may still need to be addressed.

2.6. We also recognise that there may be other important issues which are not yet addressed by this paper. The relationship between plantation establishment, carbon sequestration and climate change is one such issue. Another is the growing salinity crisis, where the broad-scale, strategic revegetation of the landscape is required to restore hydrological balance, protect biodiversity and secure the future of rural communities.

2.7. We strongly encourage policy setting bodies including governments, industry, unions, water authorities and non-government organisations to engage with this position paper when considering the plantation issue in their processes of policy development. Policy setting bodies are welcome to adopt this document verbatim.

# SECTION TWO
# Planning

## 3. PLANNING CONTROLS

3.1. During the feasibility assessment phase for all projects the cumulative impact of the plantation within a catchment will be identified and a cost benefit analysis should be undertaken prior to commencement.

3.2 Planning controls are needed to determine the location and extent of plantations to avoid adverse impacts at a catchment/landscape scale (e.g. catchment hydrology, fire regimes, fire protection strategies, potential wildlife corridors and priority revegetation areas.)

3.3 Plantations should not be regarded as an "as of right" development. Planning permits through local government planning schemes must be included for existing and newly established plantations.

3.4 All stages of planning must be developed under the auspices of the planning approvals processes required by Catchment Management Authorities and local government entities.

# SECTION THREE
# Management

## 4. MANAGEMENT PLANS

4.1 The management objectives of a plantation shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.

4.2 All stages of planning must be developed in open and inclusive consultation and active participation with all relevant stakeholders including indigenous people, local councils, resident, community and environmental groups, workers and unions, scientists and investors.

4.3 Management plans must be able to demonstrate the manner in which stakeholder consultation has been taken into account.

4.3 Management plans should include data regarding soil properties (especially relating to erodability and transportation of sediment) and slopes within the plantation.

4.5 Management plans should include data regarding water quality and yields within and flowing from the plantation, and include a cost-benefit analysis on plantation water use.

4.6 Management and operational plans (e.g. coupe plans) must be made available for public inspection and comment at local council offices. In addition, councils must ensure that these plans are mailed to stakeholder groups, are available to be copied and can be easily located on the internet.

## 5. DESIGN OF PLANTATIONS

5.1 The design and layout of plantations must promote the protection, restoration and conservation of the environment and biodiversity, and decrease pressures on ecosystems including native forests and other indigenous vegetation communities.

5.2 Wildlife corridors, streamside zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation. The scale and layout of plantations shall be consistent with the patterns of forest stands found within the natural landscape.

5.3 Diversity in the composition of plantations is essential, so as to enhance positive economic, ecological and social outcomes. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures.

## 6. PLANTATION SPECIES

6.1. In order to enhance the conservation of biological diversity, indigenous species are preferred over other species in the establishment of plantations and the restoration of degraded ecosystems.

6.2. Plantations shall be carefully monitored to detect unusual mortality, disease, insect outbreaks and adverse ecological impacts including proliferation of exotic weeds, genetic pollution of native species and biodiversity impacts.

6.3. The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the objectives negotiated in the management plan.

6.4. Plantations shall not use genetically modified organisms.

## 7. PROTECTION AND RESTORATION OF NATIVE FOREST

7.1. Native forests, woodlands, remnant trees on agricultural land, grasslands and other indigenous ecosystems shall not be cleared or otherwise modified to make way for plantations.

7.2. A proportion (Catchment Management Authorities recommend 30%) of the overall forest management area shall have environmentally targeted areas, appropriate to the scale of the plantation and to be determined in local/regional standards. These areas shall be managed so as to restore the site to native vegetation cover.

7.3. A range of incentive schemes should be made available to facilitate the conversion of existing monoculture-plantations into mixed species, uneven aged plantations.

7.4. A proportion of monies raised from commercial forestry activities must be explicitly set aside for native forest conservation and restoration.

## 8. PROTECTION OF SOIL AND WATERWAYS

8.1. Ecologically sound measures must be taken to maintain or improve soil structure, fertility and biological activity.

8.2. Accurate models which relate sediment yield to soil type and slope and the type of erosion likely to occur need to be developed and supported by plantation operations and government instrumentalities.

8.3. Existing plantations in sensitive areas such as steep slopes (greater than 20 degrees), along streamsides, springs, drainage lines and important recharge areas shall be retired from timber production and restored to the original vegetation cover.

8.4. The techniques and rate of harvesting, road and track construction and maintenance, and the choice of species and rotation lengths shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns and aquifers.

8.5. Roading is the main input source of sediment entering streams, therefore, operations of machinery and trucks must take account of weather conditions, both wet and dry, which aggravate sediment movement.

8.6. Plantation operations must not impact upon fish and macroinvertebrate populations and aquatic ecosystems, due to sedimentation, lost runoff, chemical use, salinity and thermal changes.

8.7. Plantation shall be managed to produce uneven aged class distribution, except where it can be demonstrated that it will have an adverse impact upon some species.

8.8. Responsible water authorities should receive royalties for plantation water usage above natural vegetation levels, at rates equivalent to those of local irrigators.

## 9. PEST MANAGEMENT

9.1. Ecologically sound measures shall be taken to identify, prevent and manage outbreaks of pests, diseases, fire and invasive plant introductions.

9.2. Prior to establishing plantations, risk assessment should be undertaken for diseases such as myrtle wilt, needle blight, guava rust, cinnamon fungus and honey fungus.

9.3. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and safe biological and manual control methods rather than chemical biocides and fertilizers.

9.4. Plantation management must reduce their reliance upon chemical biocides, including their use in nurseries.

9.5. Aerial application of herbicides will be banned. Herbicides will only be used as part of a strict management strategy.

9.6. Chemical residues must not enter waterways especially in domestic water supply catchments. Water testing will be undertaken especially after a heavy

rainfall event by responsible water authorities.

9.7. Commercial forestry operators and government authorities shall be responsible for the elimination of environmental weeds in adjacent indigenous ecosystems and other adjacent land. Management plans must contain routinely scheduled removal of environmental weeds.

9.8. Native animals shall not be harmed or killed with poisons such as 1080. Browsing will be controlled using alternative methods such as tree guards and olfactory repellents.

## 10. OTHER CHEMICAL MANAGEMENT SYSTEMS

10.1. Fertilisers containing sulphuric acid shall not be used.

10.2. Commercial forestry operators will be accountable for all chemical treatments used during the growing phase of plantations as well as in end products.

# SECTION FOUR
# Accountability

## 11. SOCIAL, ENVIRONMENTAL, ECONOMIC AND HERITAGE IMPACT ASSESSMENT

11.1. Monitoring of plantations shall include regular, government funded, social, environmental, economic and heritage impact assessments conducted on a local and regional basis. Plantations must not be approved if there are significant adverse environmental and social impacts.

11.2. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of community values and amenity, use or access, including the land management and access rights of indigenous people.

11.3. Special attention will be paid to indigenous peoples' values assessments, and will be inclusive of archeological and native title considerations. Assessments will recognise how changes to an area could impact upon indigenous peoples' environmental cultural knowledge and the utilisation of that knowledge.

11.4. Monitoring of plantations shall include regular assessment of potential on-site and off-site ecological impacts, (e.g. natural regeneration, effects on water resources and soil fertility) within an integrated catchment framework.

11.5. No species shall be planted on a large scale until local trials and/or experience have shown that they are ecologically well adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems.

11.6. In the unlikely event that an endangered species is found or becomes established in a plantation the area should be protected, the land owner compensated and a study undertaken to determine the ecological requirements of the species.

## 12. ENVIRONMENTAL AND HERITAGE PERFORMANCE REPORTING

12.1. Information from a standardised environmental reporting system will be made

available to any investors and the public.

12.2. Details of performance in relation to significant environmental and heritage regulations shall be included in the financial statements of commercial forestry corporations and made available to investors and the public.

12.3. There shall be mandatory auditing of information included in the standardised environmental reports, and mandatory auditing of environmental information contained in financial statements of commercial forestry corporations.

12.4. An environmental auditing system appropriate to smaller farm forestry operations and plantation owners will be developed and adhered to, except operations within plantation portfolio systems.

## SECTION FIVE
## Global Systems

### 13. VALUE ADDING AND GLOBAL TRADE

13.1. Governments must not allow the global trading system to undermine domestic decisions to introduce local usage, value adding and job creation programs, export log quotas, subsidies and incentives for reafforestation, recycling and emission control policies, certification and ecolabelling initiatives, and protection against exotic pests and diseases.

*Appendix 1*

# Key Terms

**"Commercial forestry"** means commercial tree growing on all scales, land tenures and silvicultural regimes.

**"Indigenous peoples' values"** means the social, cultural and environmental heritage of indigenous people. These can include connection to country through stories, places and spirituality, and may be environmentally based such as knowledge and utilisation of specific flora and fauna species.

**"Indigenous species"** means native plants which naturally occur (or once occurred) in a specific location.

**"Plantation"** means an area of land, other than a native vegetation area, on which a predominant number of canopy trees have been planted for commercial timber production.

**"Uneven-Age Management"** means the practice of having a mixture of trees/species of varying ages with staggered harvesting operations (single stem or group selection) at various root depths.

*Appendix 2*

# Selected References

**Relevant Documents**

- *Plantations for Australia: The 2020 Vision* (Commonwealth October 1997)
- *Private Forestry in Victoria: Strategy Towards 2020* (Victoria May 1998)
- *Private Forestry Victoria - The Right Trees in the Right Places, Towards 2020, Focusing on 2001-2004* (current draft discussion paper, NRE Private Forestry Strategy, Victoria 2001)
- *Prescriptions for the Control of Timber Production and Other Forest Uses (NRE 1998)*
- *Management Prescriptions for Timber Production and Other Forest Uses (NRE 1998)*
- *Predicting Water Yield Impacts of Forest Disturbance in the Maroondah and Thomson Catchments (Cooperative Research Centre for Catchment Hydrology, Technical Report 0/14, December 2000)*
- *Managing Sediment Sources and Movement in Forest Catchments (November 1999)*

**Relevant Victorian Legislation**

- *Victorian Plantations Corporation Act* 1993
- *Victorian Plantations Corporation (Amendment) Act* 1998
- *Forestry Rights Act* 1996
- *Forests (Wood Pulp Agreement) Act* 1996
- *Code of Forest Practices for Timber Production* (December 1996)
- *Catchment and Land Protection Act* 1994
- *Conservation, Forests and Lands Act* 1987
- *Flora and Fauna Guarantee Act* 1988
- *Forests Act* 1958

*Appendix 3*

# Victorian Plantation Management Reference Group

This position statement has been drafted by the Victorian Plantation Management Reference Group (VPMRG) which has the following members.

Serena O'Meley (Convenor VPMRG) - *West Victorian Forest Protection Network, Earthworker, Geelong Community Forum*
Peter O'Mara - *West Victorian Forest Protection Network, Wombat Forest Society*
Adrian Whitehead - *Geelong-based forest activist*
Gavin McFadzean - *The Wilderness Society*
Liz Ingham - *Concerned Residents of East Gippsland*
Loris Duclos - *Tambo Environment Awareness Group, Wombat Forest Society*
Lindsay Hesketh - *Australian Conservation Foundation*
Darren Gladman - *Environment Victoria*
Tim Anderson - *Wombat Forest Society*
John Poppins - *Paperlinx Green Shareholders Group*
Anthony Amis - *Friends of the Earth (Victoria)*
Michelle van Gerrevink – *Goongerah Environment Centre*

The group acknowledges the contribution of Charmaine Clarke (Gunditjmara); Tim Cadman (Native Forest Network); Stuart McCallum, Mark Trengove and Bruce Fletcher (Geelong Community Forum); Harry van Moorst (Western Regional Environment Centre); Charlie Sherwin and Corey Watts (Australian Conservation Foundation); Tony Norton (RMIT University); Virginia Young (The Wilderness Society); and Trevor Poulton for their comments on the draft position statement.

At the 2000 National Forest Summit it was recognised that the policy objectives adopted at the 1999 National Forest Summit (see Section One) needed to be elaborated upon to produce a detailed position on plantation management. At its February 2001 general meeting, the West Victorian Forest Protection Network decided to take up the challenge of co-ordinating an inclusive process of policy development on the plantation issue.

The development of a Victorian position on plantation management has been urgent due to the absence of environmental prescriptions within State and Federal Government policy on plantation establishment. *The Private Forestry Council (Victoria)* is currently reviewing its plantation policy so this is an important moment for the Environment Movement to present them with directions on environmental management issues.

In April 2001 a preliminary draft document, compiled from a range of policy sources and egroup (electronic mailing list) discussions, was written and circulated by e-mail to interested individuals from the two main Victorian forest campaign egroups. Individuals with specialist knowledge were also approached for their advice. Suggestions from participants were incorporated into the document or were held over for discussion.

On April 7 2001, the Victorian Plantation Management Reference Group met for the first time and worked through the draft document. A further two weeks of personal consultation with individual campaigners saw the completion of the *Interim* Victorian Plantation Management Position Statement (April 2001).

At the National Forest Summit (27-29 April 2001) the following motion was passed "The National Forest Summit welcomes the work of the Victorian Plantation Management Reference Group towards developing a joint position on plantations and encourages interested Victorian groups to become involved."

The *Interim* Victorian Plantation Management Position Statement (April 2001) is endorsed by the following campaign groups:

*West Victorian Forest Protection Network, Friends of the Earth (Victoria), Concerned Residents of East Gippsland, Geelong Community Forum, Western Region Environment Centre, Paperlinx Green Shareholders Group, Tambo Environment Awareness Group, Wombat Forest Society, Environment Victoria, Enfield Forest Alliance, Goongerah Environment Centre.*

The *Australian Conservation Foundation* and *The Wilderness Society,* which both have national campaign obligations, support the development of the Position Statement and will be referring it back through their consultative bodies for endorsement.

The Victorian Plantation Management Reference Group recognises that the development of a joint position on such a complex issue is an ongoing process which requires extensive and sensitive consultation with all stakeholders. Further development of the Position Statement will be undertaken in consultation with participating groups.

For information about joining the reference group, to comment upon or endorse the interim Position Statement, and to raise additional issues which the group might address please write to:

Serena O'Meley
Convenor, VPMRG
Post Office Box 4230
University of Melbourne Vic 3053
E-mail: sophia@pipeline.com.au
Phone: 0419 565 337

*Appendix 4*

## Future Directions

The Victorian Plantation Management Reference Group will investigate the following issues:

- Development of a joint position paper on the state of plantation management in Australia.
- Participation in the review of Code of Forest Practices in relation to commercial forestry. Copies of this position statement will be sent to the review panel with the addition of points to be covered for redrafting.
- Assessment of the implementation by State governments and local councils of the Federal Government's "Plantations for Australia: The 2020 Vision" policy statement, http://www.affa.gov.au/docs/forestry/plantations/vision.html . The Victorian Government's position can be found in "Private Forestry in Victoria: Strategy towards 2020 (May 1998)." http://www.nre.vic.gov.au/forestry/private/strategy/ (Currently being reviewed.)
- Meet with the Private Forestry Council (Victoria) and seek to have this position statement taken into account in their 'Strategy Implementation Plans' which are currently non-prescriptive in relation to environmental management.
- Assess the environmental and economic issues relating to alternative fibre sources, particularly for paper and chipboard production.
- Explore certification issues, including Forest Stewardship Council versus government certification.
- Develop a joint position on greenhouse gas emission policies in relation to plantations. See the Climate Action Network October 2000 policy paper at http://www.climateaustralia.org/policy04.html
- Organic or biodynamic certification for plantations.
- Ethical investment and plantations.
- Salinity and plantation management.

- Promotion of the position statement to political parties, unions and community organisations.

Melbourne Water Corporation
ABN 81 945 386 953
630 Church Street
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East Richmond 3121 Victoria
Telephone 03 9235 2100
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18 July 2001

Ms S O'Meley
Convenor
Victorian Plantation Management Reference Group
PO Box 4230
UNIVERSITY OF MELBOURNE VIC 3052

Dear Ms O'Meley

**Interim Victorian Plantation Management Position Statement**

Melbourne Water is pleased to offer comment on the above document with specific regard to issues concerning water quality and water yield. The following contribution is by way of comment only and in no way does Melbourne Water endorse this document in its present form.

The definition given in Appendix One of 'plantation' is ambiguous. Is it intended that native forest which has been logged and replanted, with a view to log rotation logging, be included or excluded? Melbourne Water assumes that the intention is for the document to apply to plantations on freehold or public land leased primarily for wood production. This would often exclude State Forest and National Park areas. Obviously clarity of the term 'plantation' is of the utmost importance.

In terms of the sections contained in the document, Melbourne Water believes that a separate section on roading would be appropriate as roads have been found to be a large contributor to deterioration in water quality. The following points would be relevant in the proposed new section.

- Standards for any new roads within a plantation in regards to location, shape (width, shoulders and length), slope, drainage, maintenance and applicable weather restrictions.

- Existing roads must, wherever possible, be used for timber production and any new roads must be rehabilitated after timber harvesting.

- New roads should be constructed in advance of timber plantations or harvesting.

- Run-off from roads into waterways should not occur. This can be achieved by avoiding river crossings and providing adequate drainage into surrounding bush.

Our Ref: 07/03/0094
Reg No. 01/05807
Dap:jd

13 June, 2001

Ms Serena O'Meley
Victorian Plantation Management
Reference Group
University of Melbourne
P O Box 4230
Victoria 3052

Dear Ms O'Meley

**INTERIM VICTORIAN PLANTATION MANAGEMENT POSITION STATEMENT (APRIL 2001)**

Thank you for the copy of the Interim Plantation Management Position Statement.

Latrobe City recognises the Statement as one of several opinions to be taken into account in the management and regulation of plantations.

The Latrobe City Community Environment Working Group is currently examining various issues in relationship to ecologically sustainable development. This is one of the documents that they are using in the preparation of environment policies which will be presented to Latrobe City Councillors for consideration.

Yours sincerely

PAUL BUCKLEY
**Acting Chief Executive Officer**

**City of Latrobe**
ABN 92 472 314 133

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Latrobe
*a new energy*

101 Forestry (O'Meley)

# Minister for Environment and Conservation

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DX 210098

Our Ref: MC034386R

Ms Serena O'Meley
Convenor, VPMRG
PO Box 4230
**MELBOURNE UNIVERSITY VIC 3052**

06 SEP 2001

Dear Ms O'Meley

**VICTORIAN PLANTATION MANAGEMENT POSITION STATEMENT**

Thank you for forwarding a copy of the above document to me.

In order to assist me in forming an appropriate view, I have formally requested the Private Forestry Council to review the document and provide me with advice.

Once I have received that advice, I will advise you of the Government's response.

Yours sincerely

**Sherryl Garbutt MP**
**Minister for Environment and Conservation**

Victoria
The Place To Be

ENVIRONMENT DEFENDERS OFFICE (VICTORIA ) LTD ACN 052 124 375

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Serena O'Meley
Convenor, VPMRG
Post Office Box 4230
University of Melbourne VIC 3052

8 August 2001

Dear Serena,

**Interim Victorian Plantation Management Position Statement**
**Comment by Environment Defenders Office (Vic) Ltd**

We enclose the Environment Defenders Office's comment on the Interim Victorian Plantation Management Position Statement prepared by the Victorian Plantation Management Reference Group in April 2001.

We hope this is of assistance to you. Please do not hesitate to contact us if you have any queries or would like to discuss our comments.

Yours faithfully,

Rebecca Hoare

Rebecca Hoare
**Solicitor**
**Environment Defenders Office (Vic) Ltd**

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Rosebud 3939
Tel (03) 5986 0200
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DX 30059

6 June, 2001

Serena O'Meley
Convenor, VPMRG
P O Box 4230
UNIVERSITY OF MELBOURNE 3052

Dear Ms O'Meley

**RE: INTERIM VICTORIAN PLANTATION MANAGEMENT POSITION STATEMENT APRIL 2001**

Thank you for your e-mail dated 31 May 2001 on the above subject.

There are currently no commercial plantations within the Mornington Peninsula Shire. However the Shire is presently developing a policy around the concept of sustainability based on the internationally recognised ESD principles. The position paper is generally consistent with the Shires intentions in terms of resource management and triple bottom line accounting.

Please forward me a copy of the final position paper when it is available for future reference.

Yours faithfully

Alex Atkins
**Manager Conservation & Environmental Services**

(Reference: AA:mn File: 0235/010/020)

Post Office,
TRENTHAM, V., 3458.
1-6-01.

Serena O'Meley,
Convenor, VPMRG.,
C/o Post Office Box 4230.
University of Melbourne, V., 3053

Dear Serena,

**Plantations:**

In furtherence of my previous letter dated 23-5-01, permit me to make the additional comments, but first of all, my apologies for misspelling your name.

Since writing that letter, I have been told about genetically modified plantations that mature rapidly and also genetically modified sunflower crops which produce twelve heads on one stalk. According to Moorabool Shire's environmental officer, Allan May, Council has no authority to dictate to farmers how they should conduct their activities.

**Imagine the impact of GMO sunflowers penetrating our forests!**

H.G. Wells' 1930 predictions have arrived.

Right now, 140 Ha. of public land at Barry's Reef are infested with gorse which has penetrated the adjacent Wombat Forest. Not to mention Broom and Spanish Heath. With Good Neighbour, the previous Government provided some spray and for five weeks, three bulldozers were raking up gorse into windrows to be burned off this year. Despite this Government's one billion dollar surplus, DNRE has had to absorb further financial cut-backs. I am trying to convince my local Member, "if we ignore the facts, within three years, Barry's Reef could go up in flames taking Blackwood with it".

Therefore, the efforts by people such as yourself in developing public environmental awareness, are most welcome.

Sincerely yours.

Pat. Liffman

**Peter Costigan**

Lord Mayor

25 June 2001

Ms Serena O'Meley
Convenor
Victorian Plantation Management Reference Group
PO Box 4230
UNIVERSITY OF MELBOURNE VIC 3052

Dear Ms O'Meley

I refer to your email of 31 May, 2001.

The City of Melbourne does not necessarily support the detail of your Group's interim statement, but does support its underlying principles of protecting bio-diversity and implementing best practice in environmental management of plantations.

Yours sincerely

**Cr Peter Costigan**
Lord Mayor

**City of Melbourne**

GPO Box 1603M Melbourne 3001 Telephone 03) 9658 9825 Facsimile 03) 9654 2628

July 23

Mt Eliza Association For
Environmental Care.
P.O. Box 170
Mt Eliza. 3930

Dear Serena.

The MEAFEC Committee wholeheartedly support the Interim Statement on Plantation Management. And we hope it is adopted by the Timber Industry. We must get them out of the old growth forests, if not all our forests. Good luck with it.

Sincerely Gerard McDonald
for MEAFEC Committee.

CITY OF
PORT PHILLIP

26 July 2001

Serena O'Meley
Victorian Plantation Management
Reference Group
PO Box 4230
University of Melbourne Vic 3052

Dear Ms O'Meley

**Interim Victorian Plantation Management Position Statement**

Thank you for giving the City of Port Phillip the opportunity to comment on the above mentioned position statement. We congratulate the Victorian Plantation Management on developing a management framework that embraces the principles of sustainability.

The City of Port Phillip is not directly involved with plantations within our municipality, and as such, we have no direct comments on the position statement to make. However, it should be noted that we strongly support the development of an overarching policy that represents best environmental practice.

Feel free to contact me on 92096474 should you have any further enquiries.

**STEVE CAVICCHIOLO**
**COORDINATOR - ENVIRONMENTAL PROGRAMS**

Enquiries: Steve Cavicchiolo
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DX 35706 Balaclava

**Phone** (03) 9209 6666
**Facsimile** (03) 9209 6311

30th July 2001

Serena O'Meley
Victorian Plantation Management
Reference Group
PO Box 4230
University of Melbourne 3052

Dear Serena

Thank you for your invitation to comment of the Interim Victorian Plantation Management Position Statement. After a discussion at our last meeting we decided that we would not be submitting any comments for the following reasons –

We feel we do not have the expertise to comment on this issue.
We are fully stretched working to ensure that the vegetation in the Mullum Valley is protected during the construction of the eastern freeway extension.

We agree with the basic aims of the position statement noted in your letter for worlds best-practice which includes strengthening planning controls; improving plantation management systems and instituting government and private forestry environmental reporting.

We would appreciate being kept up to date on any progress and being sent a copy of the final plan.

Yours sincerely

Diana Haby

Diana Haby
Secretary, Mullum Branch, ACF

dmhaby@ozemail.com.au

Field Naturalists Club of Ballarat Inc

PO Box 328W

Ballarat West 3350

July 4, 2001

Serena O'Meley,
Convenor,
Victorian Plantation Management Reference Group
PO Box 4230,
University of Melbourne, Vic, 3052

Dear Serena,

The Field Naturalists Club of Ballarat agrees in principle with the Interim Victorian Plantation Management Position Statement. We congratulate the Reference Group for the work done to ensure that environmental and ecological issues are used as a base for the development of industry policy.

We recognize that some areas will need further investigation, research and discussion to achieve a policy that is accepted by all stakeholders.

We would appreciate receiving any further information as the policy is developed.

Yours truly,

John Gregurke
Secretary,
Field Naturalists Club of Ballarat

Carol Hall
President

Post Office,
TRENTHAM, 3458
23-5-01.

Serean O"Meley,
Convenor, VPMRG,
c/- Post Office Box 4230,
University of Melbourne, V., 3053.

Dear Serena,

Peter O'mara, secretary of the Wombat Forest Society having given me a copy of the Victorian Plantation Management Position Statement in which your name is printed to whom one may forward additional comments, this letter is to avail myself of the privilege.

"The RFA has been the bringing together of like minded people" Michael Fox - FOLDERG and ***riverrun.*** It has also enabled one the privilege of associating with incredible human beings who are literally environmentally driven.

Enclosed are two photocopies:

1. to John Endacott based upon practical observation of a pine removal program at Barry's Reef where, if nothing be done about the resultant weed incursion of gorse, broom and spanish heath into the adjacent Wombat Forest, within thirty years one can literally kiss the forest "good bye". Despite incessant letters to all relevant avenues for spray, to this date, not one mililitre has been granted to our landcare group and even with insurance etc., one is not permitted to apply herbicides in the forest.
2. Karl Liffman's 1974 submission to the LCC when as a twenty year old student at Burnley Horticultural College, he stumbled upon a Forestry plan to convert one fifth of the Wombat (33.900 acres) into a massive pine plantation from Blackwood to Mount Macedon. (Only the ridges, not the gullies). Dr. Geoff Mosley of the ACF was too busy to speak to me but I was handed an ACF leaflet about pinus radiata, whilst the Forestry blokes, then at Flinders Lane said "You won't see the pines, they will be concealed by a buffer zone of eucalypts!" Fortunately the Hamer Government was most receptive, the area was declared an hardwood area by the LCC and that is how the Lerderderg State Park was born.

According to DNRE, there are approximately 5000 Ha. of pine plantations in the Wombat Forest. Karl says "Mum, why don't you campaign that second generation plantings be replaced with mixed species!"
The Wombat Forest could be termed a mixed species plantation. 5000 Ha. would be approximately one fifteenth of the total area. Replanting pine plantations with mixed species would be a step in the right direction.

Thanking you for this opportunity to respond to the "Statement",
I remain,

Sincerely yours,

Pat. Liffman.

***Blackwood/Barry's Reef Landcare Group*** FFT/FTLA A11936S
Post Office,
TRENTHAM, 3458.
24-4-01.

Dear John,

**Plantations.**

This letter should reach you by Thursday.

By 1994, 140 Ha. of Crown land at Barry's Reef were so thick with pine trees, some in plantation formation, the remainder being descendants of original trees planted by early miners to quickly revegetate areas denuded by mining, that DNRE decided to clear the area.

Arrangements were made with a contracting firm for merchantable pines to be sold. Royalties would go into consolidated revenue, the remainder would be cut and burned.

Unfortunately, due to simultaneous flooding of the market by Pinecorp, contractors had difficulty in obtaining their money which, in turn, affected projected returns to consolidated revenue. The promised post removal 'spray-burn-spray' program was severely reduced. With no spraying to inhibit gorse from invading the cleared sections, by 1998 vast areas were waist high in gorse. Last year via Good Neighbour, for five weeks, three DNRE dozers were busy pushing gorse plants into windrows to be burned off this year. Despite this activity, approximately 90 Ha. of Crown Land need to be treated against gorse which is now spreading into the adjacent Forest.

**The lesson to be learned from this exercise is that because pines inhibit the understorey, when the pines are removed, the residual area must be immediately treated against weed incursion.**

The RFA process has engendered concern about potential hardwood yields in native forests, especially the Wombat State Forest.. Further pine plantations within the Wombat were curtailed when, in 1976, the Land Conservation Council declared the Wombat to be a Eucalyptus area. Ideally, to increase hardwood production within the Wombat, second generation plantation planting should revert to mixed species eucalypts. Support for this proposal would be greatly apreciated.

Sincerely yours,

Pat. Liffman. (Secretary).

The Secretary
Land Conservation Council
464 St Kilda Road
Melbourne
Victoria 3000

Dear Sir

WOMBAT STATE FOREST

With utmost urgency we wish to draw your attention to the critical changes that would occur to the abovementioned State Forest, if the planting of softwood species were instigated, on account of the irrefutable evidence resulting from Pinus plantings in the Ballarat-Creswick State Forest where the Pinus growth and seeding have created a weed problem.

For this and the following reasons, the Forest Commission's policy to convert 33,900 acres of the 181,900 acre Wombat State Forest to softwood, is detrimental to the continued ecological balance of the forest:

1. Destruction of the native vegetation in plantation clearing operations would upset the micro-environments of many valuable flora and fauna.

2. The planting of softwood, e.g. Pinus species, in a natural forest area would create a weed problem in the adjacent forest because:

   a. Seed dispersal within existing native vegetation would proliferate and extend softwoods into valuable hardwood regions.

   b. Unfavourable competition for nutrition would render softwoods a strong competitor against native endemic vegetation.

   c. When competing for light with native vegetation, the introduced softwood would kill off the floristically rich forest floor.

   d. The acidic, phenolic litter of softwoods suppress the continued growth and propagation of native growth on the forest floor.

   e. The growth of "foreign" softwoods would create an unaesthetic sight in untouched forest land and would be in direct conflict with "Aim of Management (viii) ref. "Wombat State Forest" 2/74 of the Trentham District Management Plan which states ... "provision for the scenic and recreational requirements of the community, and the maintenance of suitable habitat for wildlife where this is considered practicable and desirable".

This submission to the LCC is:

1. AGAINST conversion of any area of the Wombat State Forest to softwood or imported vegetation not endemic to the area. This includes Pinus species.

2. FOR conservation of existing native vegetation in the Wombat State Forest.

3. FOR expansion and taking over of additional Crown Land, e.g. the township of Barry's Reef, which is already cleared, to widen the existing boundaries of the Wombat State Forest.

4. AGAINST reduction in the existing size of the Wombat State Forest.

We suggest that as the building industry is so dependent upon future softwood growth, it should assist financially in the purchasing of cleared grazing land to grow the necessary timber.

VIC PLATATION POS 27 AUG 2001

Date: Mon Aug 27 16:28:21 2001
To: tanderson@giant.net.au
From: petero@telstra.easymail.com.au
Subject: PLANTATION POSITION

Dear Pete,

Could you please forward this to Tim and Lorus; I'm cc'ing to Anthony. I'd rather it didn't go any further until at least the four of you have looked over it and responded. Please get back to me asap so that we can set up the meeting. Please ignore any 'slights' in the tone of the reponse. Peter Stevens has been acting as a mediator with a bunch of pretty angry farm foresters.

Regards
Serena
Monday, 27 August 2001

**********

Ms Serena O'Meley
Convenor, Victorian Plantation Management Reference Group

Serena,

Thank you for the opportunity to comment on the VPMRG's position statement on plantation development.

Below are comments from the Victorian Council of Australian Forest Growers. They must not be taken in any way to constitute support for the present position statement. The comments are provided to try and rectify some glaring anomalies, inconsistencies and impositions in the position statement which have the potential to seriously impact on plantation and farm forestry development at all scales and for a variety of purposes throughout Australia. This not only has the ability to adversely effect your goals for more sensitive plantation development and less pressure on native forests, but also the excellent work of owners of plantations of all sizes and types throughout Australia that we represent.

Basically we have four overarching comments:
We agree with some of your objectives for better plantation management and hence are probably working towards the same goal.
There are some issues that you raise that we support and that are already being considered by both government and non-government bodies (such as AFG).
There is a massive internal inconsistency in the document that leaves it with little credibility in its current form. The second stated objective (and the first has already been achieved in Victoria) is that the utilisation of plantations will ease the pressure on native forests, yet a huge number (probably the majority) of the subsequent clauses seek to impose conditions on plantation development which would effectively halt all commercial tree planting in rural areas. This would occur because the suggested conditions would impose such financial costs as to make the investment unattractive at any scale. For example, a farmer considering a farm forestry venture would continue to crop a paddock (and have no restrictions) rather than jump through the considerable array of hoops proposed here. This is notwithstanding the fact that cropping may be a less sustainable land use than the plantation.
There are issues that your group must immediately clarify in order for this position statement to be accepted as a serious document:
The first is the cost involved in many of the controls and impositions suggested which, if too restrictive (which we believe they are) will deter investment in tree planting at all scales with the resulting potential benefits from re-introducing trees into the rural landscape NEVER occurring.
The second is the delineation in the position statement between large prospectus based companies and individual landholders or farm foresters (2.5 and 12.4). Your definitions of 'plantations' and 'commercial forestry' apply to all plantation owners, with the suggestion (clause 12.4) that similar impositions may be imposed on farm foresters. There has been considerable effort over the last decade to introduce farm forestry as a normal commercial land management practice, if adopted your position statement would quickly wreck the excellent work that has gone on.
Finally the objective 'The forest movement will undertake research to identify limits to further establishment of industrial plantations' needs urgent clarification. Presently the statement conveys a negative sentiment towards

Attached are specific comments on each clause set out in the VPMRG position statement.

As mentioned, both the VPMRG and the AFG are probably working towards similar goals, however many of the impositions suggested in the position statement are totally unacceptable to the AFG. This is not to say that there i no room for improvement, so can I suggest a meeting between representatives of VPMRG involved in writing the position statement and members of the Victorian AFG to clarify some of the outstanding issues.

From this it is hoped that both groups can better understand the other's position and possibly facilitate a better-informed statement on plantation development in Victoria.

Thank you again for the opportunity to comment.

Kind regards

Peter Stephen
Secretary for the Victorian Council of Australian Forest Growers

# Attention: [redacted]

3rd Dec 2002

Dear Angela,

I have just faxed Wombat Forest Society most recent letter to the Editor which was sent to the Midland Express and not published. I understand that as a reporter you should not be expected to fully comprehend every issue you cover and as such I should not have got annoyed with your plantation article. I apologise most sincerely for expecting too much of you and becoming heated.

There are a number of forest related issues running concurrently and these encompass both native forests and plantation on private and public land. I would be more than happy to keep you informed on these issues as they happen.

Below is a brief list of issues that all deserve to be accurately reported to the public;

- Hancock's Plantations (public plantations sold by the Kennett government) across Victoria have just completed a Forest Stewardship Council (FFC) certification process and failed dismally. FSC is an internationally accepted environmental certification body auspiced by the World Wide Fund for Nature. It is the most acceptable international timber certification body as it is the only one independent of governments and industry and as such has received market preference in 70 countries. Hancocks have FSC in most of their other forest interests around the world and their buyers and shareholders have both demanded all the companies operations meet this standard. The problem is Hancock's have plantation across 27 Shires including Macedon, Hepburn and Ballarat and because of high rainfall most of these plantations are located in important water catchment areas including those managed by Western Water. Now this is the most intense form of logging, plantations use hardwood weedicides (native trees are hardwood) fertilisers, short rotations, genetic selection and a whole swag of environmentally dangerous practices. I have spoken to staff and board members of Western Water about these issues and they expressed extreme concern with the plantations in their catchments.
- Central Highlands Water (CHW) owns plantations in their catchments and owns and runs a sawmill with profits supplementing water rates in the Ballarat area. The CHW and Hancocks plantations in the Macedon area are amongst the very plantations the Greens tell us we should be moving into.
- After 20 years of industrial logging in the Wombat Forest the nature of the forest has been greatly altered. For example where once this forest type carried about 20% peppermint following industrial logging areas in the forest now carry 50-60% peppermint, where once there was probably around 5-10 huge trees to the acre we now have 1000-3000 trees to the acre. How will we manage the restoration of the Wombat for the second time in history if we don't cut down some of the trees.
- Plantation growth uses lots of water that is why plantation investors target areas that have an average annual rainfall above 700ml. In South Australia legislation has been recently passed requiring all new plantations to apply for a water right, given that Victorian farmers must now pay for water that falls on their land it won't be too long before similar legislation is put up in this State. Communities in

Western Victoria are complaining that large multi national companies are now buying up so much good farmland that communities are falling apart as people leave the district and schools are closed. Most 'Joint Ventures' in West Vic are facilitated by Midways (Geelong export woodchip Co), funded by Japanese paper companies, and are large monoculture hybrid blue gum plantations, in terms of biodiversity, they may as well be a paddock of wheat.

I do not support in anyway the current logging practices across Victoria, the industrialisation of logging since the 70s has ruined many forests across Victoria. However I am infinitely frustrated by the Greens 'lets throw the baby out with the bath water' approach to the solution to unsustainable logging in native forests. We must stop industrial logging of all kinds, native forest and plantation and build regional vegetation plans that appropriately protects that land which should be preserved and that which should be conserved.

I would be most happy to take you on an afternoon drive through the local area to see some of the logging issues I have discussed. The best way too understand these issues is to go bush and have a look for yourself, it is also a good excuse to get out of the office. Give me a ring if you wish to arrange a suitable time

Regards

Loris

Loris Duclos
President Wombat Forest Society

# LETTERS TO THE EDITOR
## 8th March, 2002.

Dear Editor

The recent reductions in sawlog volumes in the Wombat Forest announced by the Bracks Government has caused many difficulties within our local community. I believe that in a time of such community upheval that we need intergrity amongst all stakeholders. With this in mind, I have been disappointed at some local forest activist pushing forward a transistion plan for the local industry that I believe to be niave in both projection and intellect. The Cobaw And Wombet Forest Action Group's Statewide Transistion Plan, now adopted by the Wombat Forest Alliance including The Greens & Liberals For The Forest would appear to be contrary to the Victorian Plantation Position Statement, signed by most forest conservation groups in Victoria, CAWFAG included. The CAWFAG transistion plan seems to have overlooked the current standing amongst forest groups in Victoria in relation to industrial plantations, mixed-aged species, chemical applications and water issues. This transistion plan fails to provide a whole environment context and most data is unreferenced. Sawlog projections, both hardwood and softwood, are unrealistic. Any plan, which relies on the pruning and thinning of 5 year Tasmanian Bluegum (eculyptus Globulus) pulp logs to later produce 15 year old sawlogs, cannot be taken seriously. The West Victorian RFA Sawlog Project, looking at providing future sawlog supply, and of which CAWFAG is involved, is currently undertaking testing in conjunction with CSIRO, looking at the possibility of using fast-growing Tasmanian Bluegum as commercial sawlogs beginning optimistically with 32 year old trees. The plantation projections also fails to recognise that sawlog supply from a plantation resource is only 1/3 of total timber output. The CAWFAG projection of 430,000m3 should, in reality be more like 1,300,000m3, increasing the neccesary land base three fold. Such projections will primarily exist in industrial styled plantations to meet such sawlog outputs. Most alarmingly, is the lack of reference to just where these plantations will be situated in the water catchment system. Any plan should always think water first.

Beyond this, the proposed representation of each Forest Management Area in Victoria by a member of the Wilderness Society would also be at the expense of regional groups. The whole approach would seem to run contrary to the contemporary push toward whole community involvement.

I find it rather confusing that the CAWFAG criticism of the recently announced reduction in sawlog yields in the Wombat Forest, while their supposed alternative has a strong focus on industrial plantations, high water uptakes and unsustainable logging during the 20 year transistion phase.

Obviously, I am an active member of the Wombat Forest Society and our group has had differences with CAWFAG, but my letter is not a vindicative positioning. I dont operate on that level. All I am asking is that any transition plan be a wholistic option. Our local community needs to move forward with realistic local forest directions.

Peter O'Mara
1 Second Street
Hepburn Springs
3461, VIC
ph: 5348-1154

Title: APPROPRIATION (PARLIAMENTARY DEPARTMENTS) BILL (NO. 2) 2000-2001APPROPRIATION BILL (NO. 3) 2000-2001APPROPRIATION BILL (NO. 4) 2000-2001: Second Reading
Date: 28 March 2001 Database: Senate Hansard Speaker: Bartlett, Sen Andrew (AD, Queensland)
Page: 23147 Proof: Yes Source: Senate
Stage: Second Reading Type: Speech Context: Bill

Senator BARTLETT (Queensland) (6.11 p.m.) —It is my honour to lead off debate on the range of appropriation bills before us in the chamber—Appropriation Bill (No. 3) and Appropriation Bill (No. 4) and Appropriation (Parliamentary Departments) Bill (No. 2)—all of which contain a range of appropriations, not surprisingly, for a whole lot of important areas. I would like to address a couple of particular interest to the Democrats, not surprisingly focusing on environmental issues in particular, which is of course a longstanding and comprehensive concern of the Democrats from our party's inception over 23 years ago. I would imagine that there would barely be an appropriation speech made in this chamber by a Democrat that has not mentioned environmental issues.

It actually follows on a bit from a debate we were having in this chamber earlier today in relation to forestry issues and, to some extent, specifically Tasmanian forestry issues. That debate earlier today related to tax legislation, an area which can also link to appropriations. But it specifically talked about funding provided in particular circumstances under one of the regional forest agreements in force for preserving areas of forest under private ownership as part of a conservation covenant. As part of debating that issue, there were further things that were raised that I chose not to go into at the time, in the interests of time, but it is appropriate to expand on it a little further here this evening.

There is a lot of concern in Tasmania at the moment in relation to forests, as there has been for quite a period of time, specifically relating to the establishment of eucalypt plantations. One issue concerns the clearing of native forests specifically for the purpose of then replanting plantations, and the other is the sale of agricultural land also for the establishment of plantations. The issue of conversion of agricultural land to plantation is the most politically sensitive at the moment because it is having a social impact, particularly in rural communities that have previously been built around agriculture and dairy farms. The issue of the environmental impact of converting native forest to plantation is probably more significant in an environmental sense, even if less immediately sensitive politically. It is an interesting dilemma, given that many in the conservation movement have advocated a shift away from native forest logging—quite sensibly—towards plantation timber. Certainly, putting plantations onto particularly degraded agricultural land or non-productive agricultural land is one way of meeting the demand for wood products whilst trying to minimise some of the environmental impacts that occur.

Forest companies have spent more than $70 million in the past three years on buying up Tasmanian farms, bushland and infrastructure, with 30,000 hectares of plantations being established. Forest Enterprises of Australia and Gunns are the two largest companies involved, with Forestry Tasmania also contributing up to $13 million. That does not include the plantation establishment program of North Forest Products on its large existing private landholdings.

There are several issues relating to the buy-up of agricultural land for plantation establishment: the potential loss of high quality agricultural land; the loss of population in small communities where properties are sold, making communities non-viable; the concerns of milk processors if too many dairy farms go under plantations; the loss of visual amenity with the change from agricultural pastoral vistas to forest vistas; and also concerns about pesticide pollution of water supplies—all of which have potential environmental, social and economic implications. In the north-west in particular, there are communities

The specific breaches that have been raised as potentially occurring in this case include: an inadequate hydrological survey, with streams in the coupe remaining unidentified and therefore being significantly damaged by the logging operations; insufficient buffer zones in the side stream reserves where waterways have been identified; inadequate construction of the Mount Arthur Road, leading to an increased likelihood of siltation problems in waterways; extensive logging being undertaken without sufficient data and study, despite the fact that species such as the threatened crayfish are present in the coupe; contamination of the water table with chemicals and fertilisers; the fact that there are no machinery exclusion zones in the variation area in the logging coupe; and general concerns that, given the steep slopes and the difficult nature of the terrain, the whole area should never have been initially approved for logging by Forestry Tasmania. In addition—as I have already touched on in my contribution—plantations reduce the amount of water released in the catchment. What impact will this have on the water supply for people downstream? These are very serious concerns about potentially very serious impacts.

This is relevant because there are significant amounts of taxpayers' money going into subsidising these operations and enabling them to continue. Yet here we have an instance of circumstances where it turns out that taxpayers' money is being provided to enable environmental destruction to occur. Indeed, there is a risk not just of environmental destruction but of the degradation of the water supply for many thousands of people downstream, and there is a potential impact on the viability of other surrounding communities and farms as a consequence.

They are very serious issues that show the continued inappropriate nature of much of the forestry industry in Tasmania. It is of concern to the Democrats in relation to how regional forest agreements in many other parts of the country are managed and what other impacts there may well be, particularly in relation to issues such as water consequences. That is certainly a concern for the Democrats in some of the Victorian forestry operations, for example.

It highlights again why it is a particular disgrace that the federal government has not signed off on and provided support and recognition for the Queensland forest agreement, probably one of the few environmentally positive achievements of the Queensland Labor government. This is a forestry agreement that was recognised as positive by loggers and conservationists alike; in fact, it was recognised as positive by virtually everybody except the federal government. This is a real disgrace. The government is giving continued taxpayer funded support for poor regional forest agreements but no assistance for the one that is recognised as probably the best agreement yet in Australia.

The other concern the Democrats have in relation to the Tasmanian Regional Forest Agreement is that there is nothing there that prevents native forests being cleared specifically to put hardwood plantations back on top of that land. The conversion of native forest to plantation has been an issue for many years and North Forest Products have converted significant areas of rainforest and mixed forest in its private land in the north-west—thousands of hectares of eucalyptus plantations south of Burnie and 126,000 hectares of freehold land in 1999. They are establishing over 5,500 hectares of eucalyptus species annually. They are not the only company to clear native forest to establish plantations, which is a ridiculous practice. It has a significant environmental impact that is not prevented by the very poor forest agreement that was agreed to by the Labor Party in Tasmania and the federal coalition government.

[snip]