Major points and issues relating to the Ferguson Report into Ecologically Sustainable Forest Management in Western Australia's SW Forests.

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Below is a series of major points and inputs based on the Ferguson Report. In the interests of brevity, we have only included the more significant issues, thoughts and concerns raised while working through the Report. To aid finding the relevant section of the Report pertaining to our comments I have included page numbers of the Ferguson report in brackets at the end of each point.

On-line access to all working documents, plans and reports.

- The introduction of a process to incorporate a legitimate community representation in all tiers of forest planning and management. The shifts seen recently to forest values and utilisation as a result of electoral/political outcomes, make it quite clear that until the 'system' can reflect and keep pace with community values then conflict and uncertainty will continue. It is evident globally that imposed forest value/management and utilisation approaches have failed and that 'model forestry' or variations of community/stakeholder and agency co-management are succeeding.

  Page 18 of the Report states that:
  'Since 1994, it would also seem that regional (in addition to metropolitan) stakeholders and interest groups have taken a much greater interest and involvement in the planing process than was true of the past. Particular rural communities have been closely involved in concerns expressed to the review of Karri and Tingle management (Ferguson et al. 1999) and have a detailed knowledge of some parts of their particular regional forests. While sometimes statewide considerations may need to over-ride; local involvement needs to be fostered."
  (Page 18)

- A clearly defined set of indicators that lead to the need for the application of the precautionary principle. (Page 13)

- Long-term strategic plan for the long-term maintenance of ESFM within the forest estate. That sits as an over-arching set of long term strategies, which deal with issues that exceed the life of a Forest Management Plan. (recommended by Panel Report).

- Scale of implementation of ESFM. Whole of forest approach allows for trade-offs that may be justifiable within a 'whole of forest' context but quite damaging or inappropriate on a more local level. 'Whole of Catchment' is the logically best level of management unit.

- Environmental Management Systems: This is where the lines are drawn. It is essential that there be community/environmental involvement (Panel or Final Recommendation Working Group or Committee level).....Page 14 of Ferguson Paper, last paragraph.
  1. Defining context and boundaries?
  2. Identifying hazards in terms of what can happen and how?
  3. Existing controls
  4. Importantly: *'Risk management then involves evaluating the risks against criteria, deciding on acceptable levels of risk, identifying risk management strategies, selecting best risk management options and implementing. '*

  It is absolutely essential to be involved in this process, especially in setting the 'weighting' of the risks against criteria.

Terms of Reference and Scope of the Report

- Concern with the last statement on page 16. *'Identification of priorities (for future improvement) within context of existing priorities for improvements...').*

  This is restrictive on two levels. 1. It implies that 'existing priorities' over-ride important deficiencies identified in this and other recent reports.
  2. It constrains management within a rigid, and not adaptive, management structure.

- **Objectives of management (page 17)** *'To manage the native forests of the south west ...., in consultation with the community, so as to provide the values required by society while sustaining indefinitely their biological and social diversity."*

  It could be argued that consistent polling within the WA and electoral outcomes demonstrate that the above management objective has been misread or weighted towards extractive management. (Page 17)

South West Zone versus Regional Planning

- The author's refers to the forest management regions, post-war, as geographic catchments. Based on the supply of wood to *given centres of population, ports and main transport routes.* These are economic considerations not geographic. (Page 18)

- The main issue of concern for a move from Regional Planning vs. SW Zone is the potential to management on the larger scale and for various reasons (usually economic) have some areas targeted and intensely logged in a short time frame (usually the highly productive/high rainfall areas). It allows for targeting of high quality areas in a short period offset buy less logging in low productivity areas. This has certainly happened in Victoria. (Page 18)

- Take up Recommendation 2.1 with great vigour. *"As part of the process for the next FMP...the principles of ESFM and the key elements supporting the planning process and calculation of sustained yield are widely promulgated and understood."* (Page 32)

Calculating Sustainable Yield

- There is an apparent omission with regards to water yield. Water is the issue for Australia in the future. The lack of adjacency criteria or restrictions and consideration or water yield implications, needs to addressed. (Pages 33-34)

3.3 Estimating Standing Sawlog Volume

Jarrah Inventory

- Identifies that the application of jarrah silvicultural systems over broad stratum vary from planned stratum. The Report then states that ...*'The residual risk is low because small continuing biases in the volume per hectare removed principally impact on the cutting cycle and affect the sustained yield little."*
  In the current climate of intensive and optimum management and industrial logging, combined with yield based management and not area based management, can lead to gaps in supply due to over harvesting of area in order to fill volume shortfall. It is further complicated with issues relating to regeneration success and responses.

- Issues of intergenerational equity need to be clearly defined and be accountable for. (Page 35)

Karri inventory and utilisation standards

The report discusses the impact on sawlog size availability due to the reservation of the old-growth karri.

- A major recommendations is that immediate funding be given to advance 'research and development' of processing, products and potential markets from 'smaller logs'. This is essentially the same for the timber industry in all of Australia. They have become bloated by big logs and have failed to recognise that native forests produce relatively small proportions of the biggest logs. The industry is unsustainable if **it** does not carry out this R&D. The timber industry should contribute financially towards this research.

- Immediate steps need to be taken to as a result of this reports into supplying guaranteed volumes and grades of Karri until a number of resource estimate and inventory issues are addressed.

The report states:
"The marked change in the size of karri sawlogs after 2003 poses an immediate and significant hazard in estimating the proportion of the total future yield of karri that will be accepted as sawlogs. These logs will not only be smaller but a greater proportion may be affected by defect associated with borer activity." (Pages35-36)

Jarrah Utilisation

- The report discusses the complexity of monitoring predicted vs. actual yields due to the partial cutting of coupes. This is a very important factor that the community should have access to. Certainly Victoria is facing massive cuts to sustainable yield due to NRE's failure to apply adequate and 'real-time' audits of this nature. This has led to significant over harvesting and imminent substantial volume cuts.

- The complexity of the silviculture applied to jarrah means that support for Recommendation 3.3 is important. (Page 36)

- Page 37. talks of a report by Michael Codd (Jan 1999) which refers to a report from CALM relating to 'Condition 11' and spoke of the proposed *Forestcheck* monitoring system as being able to fulfil compliance to monitoring. The EPA advised the Minister that a determination on the suitability be made via Forest Monitoring and Research Committee. Which has been inactive since.

The Panel point to 3 key elements that the public are concerned with:

1. regeneration adequacy, including methods of assessment;
2. salinity constraints for silvicultural prescriptions;
3. habitat provision for the maintenance of biodiversity and ecological processes including the outcomes of the forest ecology study in the Kingston area.

Is this a truly representative list?

CALM must have report on the outcomes to the Minister by 2002, in order to satisfy Condition 11, Condition 12 and 16 are also in que. (Pages 36-37)

I suggest that pressure be kept on regarding fulfilling these requirements.

- A major question is raised with the discussions that revolve around the 'economic viability' of thinning sections of forests. There should be no doubt that if CALM/FPC are willing to allow logging then there is no question that under ESFM principles as well as National Competition Policy principles, that the cost of these treatments should be built into the royalty system.

Marri sawlog utilisation

- *'The Panel recommends that the yield for marri sawlogs should not be formally considered in the current revision of the Plan but monitoring of, and research on, the utilisation of marri sawlogs should continue.'* (Page 38)

Modelling potential wood flows to determine sustained yield.

- A concern that we came across is the lack of 'adjacency criteria' applied in forests. This reflects the lack of water yield considerations in forest planning. (Page 41)

Rotations

Recommendation 3.11, shorter Rotations The wider use of shorter rotation lengths for the jarrah and karri respectively should be explored, and the consequent impacts on yield and ESFM evaluated during the current revision of the Plan.

There are a number of issues surrounding this recommendation.

- The Panel makes the Statement that "*Increased reservation resulting from new government policies means that structural goals are less constraining at the whole of forest level though not necessarily at the landscape level, enabling consideration of a wider application of shorter rotation lengths.'(Page 42)*

  It is not a given that as new reserve additions have been made that the industry should be able to push production out of remaining productive areas of native forests. This has the potential to see increased use of fertilisation. (Page 42)

- What is the definition of extractive industries accessing the natural levels of resource? At what point is pushing the productive capacity of a forest move into plantation management? Trials can only be speculative until the full outcomes are measured. In this instance it means waiting for up to 200 years. Adjustments to sawlog availability in the short term based on factored in response from the forests is speculative at best, and has the potential to see major shortfalls in the future if growth projections and maturation prove wrong.

  If it is acceptable to push the productivity of the forest into shorter rotations to gain increased timber flows, it should also be equally acceptable to argue and implement longer rotations in order to enhance other forest values. This surely is what ESFM is about. (Page 42)

Recommendation 3.12 Structural Goals.

- Specific objectives need to be formulated in the current revision of the Plan for appropriate forest structures in terms of the mix of age or size classes and their spatial distribution across the whole forest, together with the structural goals that must then be applied in the calculation of sustainable yield.

- The recommendation is about trees. Goals should be a set of broad structural goals that brings about 'ecological management' not 'timber management'. (Page 42,43)

Local reservations and exclusion trade-offs (page 43)

- Quote: '*Often the precautionary principle will apply, since there may be no clear answer in the weighting of the benefits but the logging can be deferred, perhaps for many years, without major immediate impact. However, deferral may involve some impact on the calculation of sustained yield..*"

Note: We did not get pages 44-46. I have therefore referred to the Summaries on pages 5 & 6, which deal with Recommendations 3.14-3.17.

Allowances for Local Reservations and Exclusions

- Recommendation 3.13 rightfully is concerned with ways of building the potential for future changes to land use determinations. I am concerned that the reduction of productive area as a buffer is too open to leaving high production zones in and reducing low productivity areas. I would recommend a realistic reduction in sustained yield as an appropriate mechanism. (Page 5)

- Recommendation 3.14 deals with Local Reservation and Exclusion Trade-offs. The recommendation suggests that the trade-offs will need to be subjected to '*weigh the social net benefit accruing to the individual and/or local community,*'

  The community will only see this as an acceptable process through full and direct involvement. Again the need for a legitimate level of community management/involvement will see a greater potential for this to succeed. (Page 5)

- Recommendation 3.15, is concerning. Is it implying that by tweaking the data and modelling of the productive forests and presumably producing some demonstrable increases in future wood flows, then supplementary volumes can be taken now.

  Forest modelling is advancing with improvements of GIS systems and analysis, computing power and forest modelling. It is however an ever changing sciences. There are global problems with the realisation that some calibration standards used in the late 1980's and early 1990's has meant that sustainable yields in many countries are around 30% over the true level. Agencies have spent the 1990's defending volumes, only to then find a flaw in the modelling system.

  Can CALM/FPC absolutely guarantee the accuracy it would deliver under recommendation 3.15? (Page 5)

- In terms of Karri utilisation (recommendation 3.17), the government should do more than just encourage the industry to better utilise residues. It should be conditional on their licenses. Mills are reluctant to spend time and money on lesser grades while profiting from the efficiencies that they gain from big logs. (Page 6)

Sawlog prices and contracts

- A chain of custody style system for purchases of Grade 1 sawlogs. The future emphasis of the timber industry in Australia, post RFA, is to do 'more with less', less quantity and grade. It is therefore paramount that those mills that access top grade sawlogs must be able to demonstrate high quality product conversion of these logs.

- An open access system needs consideration. Under National Competition Policy principles, the system must be able to allow 'new' players to enter the industry and access the resource. The proposal for whole bole logging to utilise a central log yard, allows for an auction system to be applied to a proportion of the top grade or figure logs.

  The Australian Conservation Foundation has recently released a commissioned study into 'Forestry and National Competition Policy' carried out by Marsden Jacob, Consulting Economists. I have discussed with ACF that it may be useful to have a briefing of the report and the WA implications. You can contact either Lindsay Hesket or Tim Fisher at ACF Melbourne. 03 9416 1166. (Page 46)

Whole bole logging

- Keep close track of 'whole bole logging', paying particular attention to utilisation/recovery advantages over current practises. (Page 46)

Other Issues and values

4.1 'Whole of forest' issues

- *"Under ESFM, timber production is recognised as only one part of a wide range of forest outputs. Sustained yield can only be estimated as part of a system that also considers requirements for other forest functions and outputs. While determination of sustained yield is conventionally founded on an estimate of the net area of productive forest available for timber production, management towards ESFM requires closer considerations of the 'yields' of all forest outputs (e.g. biodiversity protection, water yield, recreation and visual amenity.) and these relate to the whole of forest.'*

  The use of the phrase 'forest outputs' is indicative of a view that forests are a commodity. The value of the forest for it simply being a forest with all of its complexity and life must be apart of this equation. I am aware of no area where there is consensus that the reserve systems have covered all representative aspects of a forest.

  Until this description of setting a sustained yield within an ESFM context can be satisfied, at least all of the above described non-timber values must be quantified, valued and a relative weighted system of equating the various values needs to be carried out. This is therefore the starting point in setting a sustained yield relative to ESFM. (Pages 47-48)

- Page 48 '*A major shortcoming of the present planning system is the lack of specific non-timber objectives, at either the landscape or catchment level in which each of the above elements may be differentially represented, or at the whole of forest level.'*

- Most of page 48 of the Report deals with the issue of inadequacies or holes in the current system and information base to set sustained yields within the ESFM context.
  Under National Competition Policy principles, there is a lot of scope to use ACCC intervention as leverage if the implementation of the processes in valuing all forest values is 'not as it should be'.

Mining

'...if ESFM is to be taken seriously, there are values associated with productive capacity, biodiversity, and hydrology of rehabilitated sites that warrant attention...' (Page 54)

Recommendation 4.8, Bauxite Mining Sites
The Conservation Commission should initiate a formal process for a more detailed examination of areas mooted for bauxite mining with respect to biodiversity conservation and hydrological values and an examination of the trade-offs with mining involved.

Socio-economic values

- The recommendations are for the Conservation Commission to carry out...*the calculated sustained yield in the new Forest Management Plan is likely to be substantially lower than that in the RFA, as a result of the subsequent increases in reservation.*
  Due consideration, analysis and reporting needs to be given to the likely social and economic impacts particularly in rural communities."

- The 'weighting' for these studies needs to be defined and given that timber is coming from State Forests, i.e. forest owned by the people of Western Australia, the scale of survey for the socio-economic impacts needs to be on an appropriate scale, to reflect the views of all Western Australians. (Page 54-55)

Water Resources

- It is important to get copies of the 'detailed research programs carried out over the past 20 years that underpins forest management and silvicultural practices.

- Water monitoring by the Water and Rivers Commission in many catchments have been suspended or placed on long-term reviews. WHY?? Could/should they re-commence. Logging has certainly intensified in the past few years with the rise in woodchipping. Have the studies built this in?

  The coupe plan for Barrabup shows that a number of 1st and 2nd order streams. There is no adjacency criterion. This can lead to significant impacts on water yield in catchments, and should be addressed. (Page 55)

END
11/12/06