BEGGS 'I' WPY

THE MANJIMUP WOODCHIPPING PROJECT

Comments by the Conservator of Forests on a Report and Recommendations by P.F. Cook, Convenor of the T.L.C. Committee appointed to Investigate the Woodchipping Industry in Western Australia.

1. Salinity

There appears to be a basic misunderstanding of the Forests Department's submission to the T.L.C. Firstly, leaving uncut verges of forest along streams was not prompted by salinity considerations, and secondly the Forests Department does not recognise that the <u>cutting and regeneration</u> of large areas of land leads to any significant increase in salinity in streams.

Salt is known to be held in the lower profiles of the older lateritic soils, and permanent removal of forest cover and replacement by shallow rooted grasses is known to result in increased through flow of rainfall. Leaching of salt into drainage lines and seepage areas takes place under these conditions, but it is accepted that there must be some degree of risk associated with any forest disturbance, however small. A sharp distinction must nevertheless be drawn between the permanent agricultural type removal and replacement of forest cover on one hand, and the partial and temporary removal of forest cover accompanied by prompt regeneration, on the other. No evidence has yet been found to indicate that such regeneration leads to any significant release of salt.

Extensive areas of jarrah forest were cut over by sawmills and treated for regeneration during the depression years of the late 1920s and 1930s. Following the mill falling, which in those days was "heavy selection", gangs of relief workers removed by felling or ringbarking all marri, cull jarrah, casuarinas, banksias and blackboys from openings created by sawlog removals. Branches were lopped flat to the ground, slash was removed from the butt of trees being retained, then the area was burnt hot to promote regeneration and reduce slash. Apart from the intense burn which nowadays in jarrah forest is of low intensity, the scale and intensity of this whole operation was equivalent to, if not greater than, that planned for the combined sawlog-woodchip cut. At the same time large areas of karri forest near Manjimup

and Pemberton were clear fallen and regenerated in similar fashion to that now employed in sawlog-chipwood operations. Coupe sizes in those days were much larger than now: e.g. Big Brook, encompassing some 3 000 ha was regenerated in one operation.

All those areas treated for regeneration now produce fresh water. Within the woodchip license area the domestic water supplies of Nannup, Bridgetown, Manjimup and Pemberton are derived from streams with catchments regenerated in the above ways. Throughout State Forest as a whole all the major dams for metropolitan, inland and irrigation use have had large swathes of their lower catchments treated in this way. Of these, only the Wellington dam has a salinity problem, which is easily traceable to agricultural clearing in the upper catchment.

2. Resource Life, Yield, Overcutting

Some misunderstanding of the nature of the resource and its yield is evident. This aspect was not dwelt upon at the hearing because of its complexity. What is considered wrong is the notion that the chipwood resource will be exhausted after 26 years, and that the overcut will be influenced by the fact that some karri and, eventually jarrah, will be taken for woodchipping.

Whenever a mature forest is cut to produce sawlogs there is inevitably generated a large quantity of wood material unsuitable for sawmilling but good for pulpwood, made up of logs too small, too crooked, too big, too defective, or of the wrong species. Even in the highest quality stands grown in plantation form specifically for high quality logs, about half. is suitable only for pulp or other similar products. In a natural overmature stand of mixed species the proportion is greater. Again, in the progression of a forest from regeneration to maturity the stem numbers per hectare fall from thousands at the start to perhaps a hundred at the finish. Competition, with the suppressed individuals gradually dying out accounts. for the change. In a managed forest these stems not wanted become available for use, in the form of thinnings. Indeed thinnings can be made in such a way as to increase increment on the crop trees left to continue growing. The greater pro-. portion of the wood available from thinnings is suitable only for pulpwood. In a mailiged forest therefore the amount of wood suitable for pulp will always exceed that suitable for high

separate but complementary and interdependent resource to sawlogs, and the difference in value between the two makes it unlikely that one will be used for the other.

The point it is wished to emphasise is that while there is an overcut in sawlogs this is not so for chipwood. Estimations of overcutting have always been with reference to the actual or potential growth of sawlogs. The assumption that the whole area will be finished in 25 years and a new cycle of clear felling for chipwood must start again ignores three facts:

- The sawlog cut is programmed to be reduced, and will be reduced, thus extending the life of the remaining virgin stands and
- 2. There is an important role for a woodchip industry to play in thinning regrowth stands, not clear felling as implied in the report.
- 3. After 15 years there will be an opportunity for the woodchip operation to be reviewed it can be scaled up or down, it can change from large to small logs, to different species, or can be allowed to lapse.

3. Recommended Reduction in Level of Cutting

The report does not define whether the recommended reduction in cut is for woodchipping, sawmilling, or for both. Unless the reduction applies to sawmilling primarily, the exercise is a waste of time, because, if not, it will then have no influence either on the level of overcut or the environmental influences referred to.

The same criterion must be applied to the recommendation on the Shannon River catchment, in which the reduction of wood-chipping only was nominated.

4. The Shannon Catchment

Seldom mentioned and certainly not discussed at length at the hearing, are the deficiencies of the Shannon River Basin as a conservation reserve - viz. a history of 25 years of continual large scale logging, the existence of a township and

roads, extensive fire damage in the mid catchment, a high proportion of non forest, and inferior scenic values compared with the Donnelly, Warren, Deep and Frankland Rivers. Perhaps of more concern is the possibility that an alternative system of reservation, which disperses the equivalent area of karri forest through a series of smaller reserves in each of the major river valleys may be superior to the Shannon concept. Provided that the viability of the smaller reserve can be supported by buffering with treated forest of essentially the same ecosystem, there are good scientific arguments in favour of the greater measure of preservation of ecological and genetic diversity. The two concepts are under consideration by the Environmental Protection Authority at the present time. To opt one way before due consideration is given is premature.

5. Conclusions

(a) - "the project is positively environmentally harmful"

It is stated that the conclusions do not imply any criticism of the way in which the Forests Department have carried out their duties because this is consistent with the value judgements implied in the Act, namely that the forests have to be regarded as a commercial timber resource. It is necessary to point out that the Act provides for the Department to have the exclusive control and management of all matters of forestry policy and the short title clearly indicates it is "AN ACT to provide for the better Management and Protection of Forests". In view of this, the Conservator or the Department could not be excused for permitting a project which is "positively environmentally harmful" to proceed without the strongest protest.

(b) - "secrecy and haste"

It is also necessary to comment on the alleged secrecy and haste with which the project has been undertaken. In the early 1960s it was recognised that the question of marri usage would pose problems when the sawmill cut was extended to the mixed marri/karri stands. In 1964 positive efforts were taken to obtain a market for marri sawlog material and concurrently further trials were initiated to assess the impact of marri removal. In 1967 the Covernment announced its intention

to call for proposals to export as wood chips the nonmerchantable fraction of marri and other species cut for sawmilling. After two years of evaluation and negotiation, an agreement was ratified by Parliament in 1969 and a revised agreement was approved by Parliament in 1973.

It must also be pointed out that the Forests Act has been amended on a number of occasions during the past sixty years. As recently as 1974 this Act was amended to provide for the Forest Diseases Regulations and the Government recently gave notice of its intention to carry out further amendment in the current Session of Parliament.

There is an obligation to prepare a Working Plan for the management of the forests by the end of this year and it is believed the Trades and Labour Council would be acting responsibly if it reconsidered this issue in the light of the decisions taken as a result of this plan.

BJB:BM

April 12, 1976