



## Organisation For Sensible Environment Conservation

ORGANISATION FOR SENSIBLE ENVIRONMENTAL CONSERVATION

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SUBMISSION ON THE DRAFT REGIONAL MANAGEMENT PLANS  
TIMBER STRATEGY AND SUPPORTING PAPERS

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AS :

Prepared by the Department of Conservation and Land  
Management (CALM) on behalf of the Lands and Forests  
Commission.

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The Organisation has examined the Plan and requests that the comments, opinions and advice contained in this document are considered when the architects of the final submission to Government for legislative action.

The organisations executive advise's the contents have been the result of membership and committee participation and that the issues have received thorough examination and are the culmination of concerned debate.

I hereby submit this document on behalf of the Organisation for Sensible Environmental Conservation.

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## SUMMARY

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As a broad interest community group with a rational approach to conservation, OSEC supports the general thrust of the Strategy For Timber Production In Western Australia. We are guided in our view by the World and Australian conservation strategies.

A cornerstone of the World Conservation Strategy is that planning should pursue the goal of living resource conservation for sustainable development.

OSEC considers adequately managed operations within the forest, represents an ideal opportunity to reach this goal.

One of the most economic sustainable developments is timber production. OSEC sees Manjimup as being the conservation centre for this State. By supporting sustainable development of a renewable resource within the Southern Forest.

OSEC supports the views of long term security of purpose and tenure. However, we are concerned with the allocation of land use. It is in this respect that the Strategy fails in two areas.

1. Certain areas of the Shannon Basin are not unique in a national sense.
2. Failure to meet the goals of the World and Australian Conservation Strategies, as well as objectives for timber production as outlined on page 44 of the supporting documents for regional plans.

We believe the allocation of use outlined in the Forest Departments General Working Plan 87 of 1982 should be adhered to. As such OSEC opposes the inclusion of the whole of the Shannon Basin in a national park.

We are concerned at the productivity of jarrah and marri, and outline the need to optimise research into insect attack, to assist productivity.

The Jarrah forest is a huge resource which should be used to benefit all people of our State and nation. Production targets should be set and achieved. OSEC suggests greater accountability for the people who control this valuable resource.

OSEC further suggests the need for commercial accounting, in particular with regard to allocation of CALM costs and revenue, from individual land uses. This manner the public is informed of the true cost/revenue of ALL land uses.

OSEC supports the long term contract of sale for the timber industry, but ~~and~~ concerned with the effects to our regional community if the allocation and contract system suggested is put into practice.

OSEC believes the levels suggested by CALM for value added products produced by the timber industry, are too low. These suggested levels are already being surpassed. We hope this does not reflect CALM'S knowledge of the industry.

The suggestion that CALM controls logging and roading (more than currently), has input into sawing, drying research and marketing, are opposed. CALM should concentrate in the areas where it has expertise. That is, developing a better tree, forest and ecosystem, whether it be for recreation, timber production, water quality and production, or conservation.

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## LAND USE

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### 2.1 AS A NATION AND AS A STATE, AUSTRALIA IS A NET IMPORTER OF TIMBER.

Although our local community gains much socially and economically as a result of the timber industry, as a State and as a nation we are net importers of timber.

The State should therefore optimise timber production, while retaining the areas necessary to conserve representative portions of all varying natural habitats throughout the State.

### 2.2 SECURITY OF PURPOSE.

OSEC commends the Draft Management Plan for the proposed principle of security of purpose for all forest users. It will enable the various forest industries to plan with confidence, and that set aside for recreation and research and conservation, freedom in the knowledge that the estate will be secure in perpetuity.

### 2.3 ALLOCATION OF LAND TO THE VARIOUS PRIORITY USES:

ie. Discussion of Table 3B, Page 13 - Southern Region Management Plan.

(1) OSEC supports the allocation of land as outlined in the General Working Plan (GWP) Number 87 of 1982.

Land Use Category	Pure Karri		Mixed Karri		Other Forest		Other		TOTAL	
	Area	%	Area	%	Area	%	Area	%	Area	%
National Parks	16,200		26,900		61,400		126,000		230,500	
Nature Reserves	400		1,100		16,100		15,000		32,600	
State Park			100		4,800		4,300		9,200	
Forest Park/Reserve	1000		8,800		41,300		4,900		56,000	
<b>SUB TOTAL</b>	<b>17,600</b>	<b>30%</b>	<b>36,900</b>	<b>33%</b>	<b>126,600</b>	<b>25%</b>		<b>53%</b>	<b>328,300</b>	<b>35%</b>
<b>STATE FOREST</b>										
Catchment Prot.	300	1%	2,700	2%	216,400	44%	94,700	34%	314,100	33%
Water Production	3500		4,200		10,300		6,000		24,000	3%
Timber Production	28,100		52,400		98,900		23,000		202,400	21%
	31,600	54%	56,600	51%	109,200	22%	29,000	10%	226,400	24%
<b>RECREATION</b>										
R,R & S RESERVE	9,100		15,100		44,300		7,100		75,600	8%
	58,600		111,300		493,500		281,000		944,400	



The table on page 18 SRMP indicates a change from the GWP '87 (1982) as a result of the Shannon Area. (This issue will be dicussed separately)

Of the 689,400 hectares of land in the Manjimup Shire, only 10% is cleared for farming. As a major proportion of land in the Manjimup Shire is public land, it must be managed to ensure a viable future for the communities in the area. Confidence has been increased in the agricultural land use, an example of this is the advent Edgell-Birdseye potato processing project, therefore care must be taken to ensure the viability of this proposal is not eroded.

Concern is expressed that in reserving a large proportion of public land for conservation, that the community needs cannot be met by intensive management on the production areas.

In particular, a large area of land is allocated to catchment protection, OSEC stresses that this should be managed for multiple-use purposes.

Timber production and recreation should be optimised while catchment protection is maximised to meet community needs.

The current practice of jarrah sawlog with no marri removal in the Warren River Catchment, does not allow adequate jarrah regeneration and is changing the specie balance.

This practice does not optimise benefits to the community and should be addressed by the removal of both species.

#### 2.4.1. THE CHANGE OF LAND USE ALLOCATION AS OUTLINED IN GWP '87 (1982). TO INCLUDE PARTS OF THE SHANNON BASIN IN A NATIONAL PARK.

We believe the publications "Conservation of the Karri Forest" and Dr. Peter Attiwell's publication "Karri Forest Conservation", rationally discusses the issue of reserving areas of Karri forest for conservation purposes. The conclusions reached in these documents are relevant today. Therefore, we oppose the declaration of the whole of the Shannon Basin as a national park.

Approximately 5,000 hectares of the Shannon has been regenerated following clear-felling. Rather than lock this area up, it should be used to support the conservation needs elsewhere in the Shannon region, rather than place unnecessary cost on the state.

The supporting papers for the Draft Management Plans page 11, states "The classification of National Parks is generally to be given to areas of national or international significance for scenic, cultural or biological values". "Conservation of the Karri", suggests that much of the Shannon Basin is not significant in a national sense. We believe the category of State Park or Forest Park, better fits the definition. This would also allow tending of the regrowth forest.

It is important to note that the Shannon comprises approximately 59,900 hectares, of which 22,300 hectares is Karri and 20,900 hectares is Jarrah-Marri. CALM in GWP 87 (1982) and "Conservation of the Karri", (page 47-48), states that 40% of the Shannon is reserved from cutting.

Therefore in very broad terms, an additional 43,200 hectares  $\times$  60% = 25,920 hectares, has been withdrawn from logging. The benefit lost as a result of this to our State is 25,920 hectare  $\times$  4 cubic metres per hectare yield per annum (= 103,680 M3)  $\times$  \$25 (Royalty) = \$2.6 million per annum. With milling and processing the economic opportunity lost to the community is obviously much greater than this. This is based on an average increment of 4 cubic metres per hectare per annum. The CALM Timber Strategy page 39 estimates a potential increment of 8 cubic metres per hectare per annum for Karri and 1.7 cubic metres per hectare per annum for Jarrah. It must be remembered that much of this area has already been roaded and prepared for logging.

The value forgone by the inclusion of these additional areas in the national park as a result of a political rather than scientific decision, seems to be great in the current economic climate.

#### 2.4.2. "OTHER AREAS".

Twenty three thousand hectares of the area allocated to timber production is in the "other" category. OSEC assumes this means that 2% of the timber production area does not actually grow trees! These areas should be identified as part of the areas reserved for conservation, if they are unsuitable for production. If they are suitable for planting to trees, they would



provide a better alternative than buying agricultural land for plantation development. This land should be identified and potential development assessed.

#### 2.4.3. ROAD, RIVER AND STREAM RESERVES.

Of the total area, 8% is in road, river and stream reserve. OSEC endorses the review which seeks to distribute road, river and stream reserves to ensure they more closely reflect tourism, water quality, flora and fauna protection needs.

#### 2.5 CALM PROPOSAL TO PURCHASE PRIVATE LAND IN MANJIMUP SHIRE.

OSEC believes the private land purchase should be on the basis of equitable land exchange. OSEC does not wish to see the area of good agricultural land reduced.

It is believed land in isolated areas, or difficult to service, could be sold as part, or exchanged for areas of state forest which CALM finds difficult to manage.

Government decisions on the Shannon and its platform to prohibit planting of exotic tree species on alienated land has transferred tree planting for paperwood production and pine onto private land.

? This has caused an erosion of privately held land and dislocation of families within the shire. The effect to the shire's economy as land is passed from private ownership to public, is detrimental as the shire generally cannot collect rates from government or public lands and will become more severe if allowed to continue.

Conversely, improved management techniques in moribund state forest for both pine, paperwood and hardwood regeneration would be rewarding. It would allow farmland to be left to agricultural production, wood resource available from re-forestation projects, clearing contracts and harvesting. Subject to not having unique values.

#### HARDWOOD IN PRIVATE OWNERSHIP.

The Department's proposal to investigate the potential of private forests is commended by OSEC.

The undertaking to make an inventory of private forests, provide advice to private forest owners on silviculture

management, hardwood sharefarming, etc. are all matters which CALM should pursue with vigour. The Department is to be commended on this proposal.

#### TIMBER AND LAND USE

OSEC strongly believes that more trees and tree species need to be planted. This should be done on a greater scale for:

- (a) Salinity Control.
- (b) Soil Erosion.
- (c) Shelter Belts.
- (d) Aesthetics.
- (e) Timber Products.

Many of these suggestions may be combined to achieve a preferred result. Eucalypt species should be a priority as the majority of land in the Southern Forest Region supports this variety.

Farmers should be given incentive to plant parts of their properties which do not lend themselves to agriculture. (Topography problems, steepness, soil type, odd survey, salt area, erosion, etc.)

OSEC is also of the opinion that more trees should be planted on alienated land.

#### 2.6. WE ENDORSE THE CONCEPT THAT THE USER PAYS.

This should be coupled with the requirement for CALM to be commercially accountable. A CALM district manager is responsible for a multi-million dollar budget. Allocation of this budget into timber production, water protection, conservation, recreation etc., is essential. eg. A thinning programme in a water catchment, for water production should not be allocated to timber production. All fire requirement is not solely timber production. Costs to particular department be recorded as such.

#### 3.1. PRODUCTION OF THE JARRAH FOREST. (Relating tables on pages 7, 80 and 81 with discussion on pages 57 and 79)

OSEC supports CALM'S attempts to maximise timber production. The jarrah forest must be fully regenerated, protected and tended. The target of 1.7 cubic metres per hectare yield per annum has been

indicated as the potential increment for jarrah. (page 39 of the Strategy).

As a community group with a rational approach to conservation, OSEC sees a need that this valuable resource, 325,600 hectares x 1,7 cubic metres increment per hectare per annum (553,520 cubic metres per annum), must be optimised.

OSEC appreciates that not all of this volume will be in a size range suitable for harvest, however a projection of only 40,000 cubic metres per annum in the year 2040, does not appear to be utilising this resource to the fullest to meet community needs. Surely these forests can produce more than 40,000 cubic metres per year!

*How cut log less than 2.4m:*

#### JARRAH INCREMENT

OSEC is concerned that no targets have been set for when the harvested volume will equal the increment volume. Especially when on page 57 the strategy suggests the possibility of sawlog from thinnings after 40 - 60 years. Also that Abbott and Loneragan (1986) page 36 states "in a measured plot at East Kirup, the M.A.I. of volume was 28 cubic metres per hectare per year". We further quote from Abbott and Loneragan page 98, "At present only \$0.43 per hectare is spent on jarrah silviculture in contrast to \$4.98 per hectare for Karri and \$505 per hectare for pines. OSEC appreciates the large area of jarrah accounts for this difference, but the point the organisation stresses, there is a large resource that is not being optimised.

#### INSECT AND DISEASE ATTACK

For obvious reasons the Phytophthora cinnamomi problem has dominated research in the past. We stress the need for research into insect attack as being paramount to the future success of the jarrah forest. It is in this type of research the Department can assist in developing future forests rather than sawing, drying and marketing research.

### 3.2. MARRI

The strategy exposes no plans to develop the State's most abundant specie. Whilst marri is regarded today as an inferior wood, and labelled as unsuitable for sawlog, it has potential as a future resource. *? NOT ALL PERSONS*

The indifferent approach to a timber which Technical Timber Guide (Sfb Gil (14n) UDC 694.1:620.192.5) lists it as having shrinkage properties of such species with established commercial reputations such as Gaboon, Larch, Sapele and Ramin. (Ref. Appendix B), is treating marri with negligence.

Marri is also a specie that has demonstrated a proven resistance to some of the major pests and diseases affecting the jarrah forests.

OSEC submits that as a resource for future generations marri has an important role to play, and should be given adequate appreciation, research and development, to ensure this common specie is able to become a valuable commercial resource.

OSEC wish to encourage and support any programme that will develop and improve marri as a quality resource.

## CONTROL OF HARVESTING

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### 4.0. HARVESTING.

OSEC considers it inadvisable for CALM to put logging and roading to tender.

The sub-contract system for Government work of this nature has revealed that irresponsible contractors can be granted work. When this happens faults are covered up, misinterpretation of instructions result in irreparable damage. The risk to the environment is too great for this to be introduced.

Continuity with existing operators is advisable, as they are more accountable, and aware of responsibilities that have become established over many years.

They provide the knowledge and research to develop environmentally sound harvesting equipment and systems. e.g. such as modern harvesters and low soil impact machinery. Without security of work and the ability to re-invest in machinery this current advantage will be lost.

Current industry supervision has shown to be responsible in daily operations, with confidence built up with long associations.

CALM funds would be at risk should poor workmanship become evident after the contractor has moved on or even out of business. Damage would have to be made good at extra cost, both to the environment and the area of concern.

OSEC has confidence in the officers of CALM in the role they are accustomed to, this confidence can be easily lost by one small error of judgement outside their normal role.

#### 4.1. CONTRACT OF SALE.

OSEC strongly supports the management plan's proposal to change from a system of annual licences to long term contracts of sale. As the concept of providing forest resource users with security of tenure is necessary in any conservation strategy.

OSEC believes that the principle of long term contracts should be extended wherever possible.

This change will give long term security to sawmill operations and should further encourage long term commitment by the industry.

It strengthens the industry's ability to further extend into value added production as it will allow confident research, planning, investment and marketing decisions.

#### 4.2. MINOR FOREST PRODUCE.

The proposal in the Strategy is contradictory to traditional practices. It is well recognised that resource users particularly farmers will be disadvantaged because stockpiling of posts or fencing materials will result in deterioration (drying etc.).

Fence posts need to be used in a green or freshly split condition to maximise the life of the post. The time for fencing is in the winter, when the ground is soft and other farm duties are minimized, The organised system suggested would not meet these requirements. The minimum volumes mentioned are not practical.

\* Contracting will result in increased costs, and may not be necessarily more efficient as farmers would prefer to deal directly with CALM for their minor forest requirements.

*fencing material is not the only <sup>MF</sup> product*

#### 5.1. VALUE ADDED PROCESSES

The plan has a major thrust to increasing the amount of value added production.



Two clear objectives emerge. (1) That the high value added products be increased from 13% to 50% by the year 1997. (2) That an amount of 30,000 cubic metres of the highest grade logs, for the specific purpose of ensuring supply to the furniture industry.

OSEC is seriously concerned that CALM appears to have either ignored, or misunderstood the current situation in the jarrah industry.

Bunnings have publicly stated that it is currently allocating nearly 60% of its jarrah output into stock for processing. The total output for value added production (including veneer stock, etc.) would be approaching 70%. OSEC is at a loss to find evidence or basis to the 13% current value added mentioned in the Plan.

OSEC understands that the first priority for major jarrah sawmills in this region is for veneer, joinery and other high value products.

Industry has publicly stated that major commitments have been made to processing in the region and that further improvements are planned.

OSEC concludes from this that the industry has already moved very positively in the direction that the Management Plan proposes. The industry is maximising production of high value stock from all jarrah being milled.

OSEC is concerned that the proposal to redirect the highest grade logs to a special sawmill will in fact have a detrimental effect on the industry. Concern is expressed that lowering the quality of jarrah by this proposal may remove the viability of existing sawmills dependent on a general mix of log quality.

OSEC believes that the industry's current efforts to maximise production of high value products from the entire jarrah cut, is obviously in the States best interest, and that CALM should re-appraise its proposals in the light of these developments.

## INTAKE ALLOCATION

The statement that it is intended to allocate 50 - 90 percent of current intake and adjust it proportionally to allow for reductions in allowable cut, (Timber Production Draft, page 103) is of concern.

Whilst OSEC recognises the necessity to reduce the overall cut, this would be unsatisfactory without a reasonable lead time for its introduction. Sawmillers would be unable to plan for economic production without a significant reliable quantity.

The 30,000 m<sup>3</sup> of high grade sawlog removed from the present intake on the assumption that it will yield furniture grade material, is a supposition without foundation, as currently ALL logs that are processed through major mills are extracted for this purpose. To deny this resource out of a general mix of various grades of sawlogs will deny sawmills the logs that provide the average at a level for viable operation.

The proposal to inject into the sawmilling system 11,000 m<sup>3</sup> of short jarrah sawlogs in the Southern Forest Region and 5,000 m<sup>3</sup> in the Northern region, would necessitate a considerable capital investment in restructuring the present mills. As they are at present structured to handle the general minimum of 2.1 metres in length.

### 5.3. PAPERWOOD

OSEC supports the strategies proposal to "investigate the potential for, or the establishment of, a pulpmill" (page 32). However, the figures detailing the resource and its potential availability appear to be taken only from the current Chipwood Licence Area, and ignore substantial volumes available from other sources.

The silvicultural advantages of a pulp mill to take thinnings are enormous and as such, analysis of the resource potential is of very high priority.

## 6.0. SOCIAL EFFECTS

OSEC has identified three areas of potential job losses and other social effects in the Southern forest area from proposals contained in the Draft Timber Strategy.

1. The proposal for a special mill to process 30,000 cubic metres of high grade logs.

As the resource for this proposed mill is the entire South-West, it is unlikely that the mill would be constructed in the Southern Forest region. This would then obviously result in high grade logs leaving the district.

The job losses which could result from this resource moving for milling out of the region, would be felt in the following areas:

- (i) Sawmilling. This resource leaving the Shire.
- (ii) Processing. Currently nearly all production for processing is processed in the Manjimup area.
- (iii) Engineering support for the timber industry. Manjimup has developed as a centre for timber related engineering services.
- (iv) General trading community. Any reduction in primary jobs has a downward multiplier effect on the local business community.

2. It is proposed that CALM will progressively introduce integrated logging under departmental control.

OSEC is concerned that if CALM were to take total control of all forest operations, there is a clear risk that contracts could be awarded outside the area which once again would be detrimental to local employment prospects.

An example of this would be the log truck roading programme. Currently up to 200km of roading required each year is all but completely done by local companies through local employment.

If the contracts were let as open stand alone contract, then there is considerable potential for Perth based or external contractors to obtain the work. This would then have an immediate impact on the local work force and once again a subsequent loss in engineering services and general business requirements and employment.

The proposed CALM fees would be added onto the cost of harvesting. Such additional cost to the industry could lead to rationalisation at sawmills with inevitable job  
+S  
With the introduction of the contract system the traditional safety standards could be eroded.

3. The changing jarrah resource could effect the financial viability of existing sawmill operations.

It should be noted that the log resource currently available to the Southern forest industry is going to decline very sharply.

Currently	206,000m3
down to	150,000m3 in 1988
down to	100,000M3 IN 1997

CALM proposes to make up some of the shortfall by introducing logs of lower specification. This includes:

23,000m3 of second grade logs  
11,000m3 of short logs.

This reduction of traditional logs affects the financial viability of existing GP mills.

If they should be incapable of handling the lower grade resource, then some potential exists for these logs to leave the Southern forest area for sawmilling elsewhere.

The current position where two of the three mills operating on the new regrowth karri resource being located outside the area should be noted, in light of these proposals.

Instability in the sawmilling industry reflects on the business community in general. Reduction in allowable cut could cause economic dislocation to local enterprises.

REFERENCES

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Conservation of the Karri Forest.

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ECOLOGY OF JARRAH (Eucalyptus Marginata) IN THE NORTHERN  
JARRAH FOREST OF WESTERN AUSTRALIA

Abbott & Loneragon

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BULLETIN NO.1 DEPT OF CALM (1986)

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WORLD CONSERVATION STRATEGY

IUCN, UNEP, WWF.

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NATIONAL CONSERVATION STRATEGY

Dept of Home Affairs

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TECHNICAL TIMBER GUIDE NO.9

Timber Development Assoc., NSW. and Others.

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