

SUBMISSION TO FSC AUSTRALIA MIKE THOMPSON 16.09.10

Subject: Submission on criterion 5.6

To: FSC AUSTRALIA

Thank you for this opportunity to comment.

This submission was gleaned from 150 attendees at Australia's Forest Forum 11-Sep-10 in Batemans Bay - and subsequent discussions.

Our one-page Forest Forum Program attached conveys breadth of our participants and follow-on workshop discussions - which unfortunately did not include a speaker from FSC Australia due to an unavoidable late apology.

#### 1. NIPPON PAPER

Community discussion last weekend questioning sustainability in our State Forests was picked up by ABC Radio this week.

Over 80% of whole-logs from East Gippsland and South-East NSW are now being trucked directly to the Eden Woodchip Mill, and its owner Nippon Paper was accused of being Japan's least environmentally friendly paper company.

In response to a question from the local ABC presenter about the importance of FSC, Mr Vince Phillips, Corporate Affairs Manager for Nippon Paper subsidiary South East Fibre Exports (Eden Woodchip Mill) stated :

"Our woodchip market is controlled by Asian customers.

"We have not had one question from any of our customers anywhere about Forest Stewardship Council Accreditation.

"None of them are asking us to get it.

"This whole thing about FSC is just an attempt by the green movement to take over world-wide forest accreditation, and it is not affecting us in the marketplace."

<http://blogs.abc.net.au/nsw/2010/09/will-south-east-follow-tasmania.h...> 15-Sep-10

#### 2. NATIVE FOREST CARBON ACCOUNTING

WWF Australia earlier this year made a submission to the NSW Government opposing approval of any Biomass Burner at the Eden Woodchip Mill until logging operations in their catchment native forests managed by Forests NSW received FSC Certification and were subjected to full native forest carbon accounting.

The Eden Forest Furnace proposal would actually perpetuate much more carbon pollution than a Coal-Fired Power Station.

ACF Spokesperson Graham Tupper also said at Australia's Forest Forum 11-Sep, that "rules for carbon accounting need to be fair and reasonable".

His comment followed a video shown at the forum and follow-on expert comment which refuted as "pure NAFI Spin" the 2005 Carbon Graph still being irresponsibly touted by State Logging Agencies and their Industry colleagues - as per Dec-09 <http://www.abc.net.au/7.30/content/2009/s2772743.htm> .

NAFI again promoted this 2005 Graph at a recent ANU Forest Conference (convened by Professor Peter Kanowski), and when challenged to reference the underlying peer-reviewed data the NAFI Presenter said "Forests Tasmania has that data"!

Self-serving "Carbon Neutral and Better" claims by Australia's State Logging Agencies and their Native Forest Industry funders are indefensible and are following the same shameful parallel history of denial as the Tobacco Industry.

Carbon pollution from logging and loss of carbon sinks in old trees is being wilfully ignored by our Australian Governments - amidst hypocritical funding to curtail logging in poor neighbouring third world Asian countries.

Peer-reviewed data is urgently needed to graph real carbon outcomes from projected native forest logging under RFAs across the same ten-year period as Australia's Climate Action Plan (2010-2020).

Precautionary principles dictate we act now based on existing comprehensive information.

Would stopping native logging for woodchips in our own State Forests under RFAs be Australia's most cost-effective Climate Action (2010-2020)?

### 3. FOREST ECOSYSTEM SERVICES

Carbon, Water and Biodiversity are included in the vital Forest Ecosystem Services outlined in peer-reviewed science presented to Australia's Forest Forum 11-SEP by the NSW Government in their historic 60-page report on Australia's Great Eastern Ranges

[www.environment.nsw.gov.au/resources/nature/ccandger.pdf](http://www.environment.nsw.gov.au/resources/nature/ccandger.pdf)<<http://www.environment.nsw.gov.au/resources/nature/ccandger.pdf>>

Sustainability of Australia's native forest operations must be defined by reference to this kind of credible data.

### 4. INVALID ASSUMPTIONS

We assert that the proposed assumptions in the FSC Australia discussion paper are false.

The history of a forest area and the rotation and cutting cycles are not sufficient to define whether the sustainable yield criteria has been met.

The assumptions allow for, and assume, that clear-felling is an acceptable form of silviculture. While it can be argued this is ok for plantations it is not acceptable in areas of native forest. Regardless of the management history the biodiversity, hydrological, carbon, fire hazard reduction and connectivity values of any forest area require that in order to achieve sustainability a silvicultural regime is required that tends to multi-age forest.

'Natural Tree Hollows 180 - 400 years old' was the heading on page 6 of the Australian Government's own 'RFA Forest News' a decade ago (I cannot find a date on my copy).

Older growth trees and forests are required to sustain Australia's unique biodiversity. We must not only protect all existing old trees but the multi-aged trees that surround them to enable long-term regeneration of Australia's unique natural Old-Growth Forests.

Imposing 40-year rotations in State Forests without a 'Social Licence' via virtual-clear-felling of native forests simply for woodchips is a recipe for ongoing and just 'Forest Wars'.

Old trees also provide maximum reliable water outputs over decades; reduce fire hazard and store more carbon. Connectivity between areas of undisturbed forest must be of sufficient dimension to be suitable habitat for target species.

Any rotations or cutting cycles must demonstrate they are not damaging or diminishing these other forest values. This needs to be built in to assessment of sustainable yield.

i.e. Areas of forest required to maintain biodiversity, connectivity, hydrological outputs and carbon storage must be clearly set aside and not included in any calculations of wood yield.

The expected sustainable wood yield needs to be demonstrated with data. This would include information about each forest ecosystem type, its current growth stage, standing volume and basal area and its demonstrated annual increment. Proposed silviculture needs to be clearly described, what % of the FMU will be logged each year, and how this can be maintained in perpetuity. This requires more than just having a management plan and a forest inventory. Such documents need to be based in demonstrable fact.

Sustainable yield needs to be adjustable i.e. no wood contracts for future expected yields can be entered into that can't be changed if the growth increment is not as expected; fire or pest or drought etc reduces area of forest.

There should be no logging of mature or old-growth trees. All of these are producing water which is more valuable product than timber, and whose capacity to maintain water production is diminished by logging. It is not possible to meet the definition of sustainable yield in Principle 5 while logging mature or old-growth trees.

I look forward to ongoing productive dialog with FSC Australia and most of its diverse members.

Yours Sincerely

Mike Thompson

Forest Forum Facilitator - on behalf of environment groups

Visit [www.nature.net.au](http://www.nature.net.au)<<http://www.nature.net.au>>

PO Box 107, Batemans Bay M: 0417 217 130