

**Victorian Association
Of
Forest Industries**

OLD GROWTH FORESTS

A

REVIEW



October 2006

Old Growth Forests - These are the Facts.

Old growth forest is a part of the life cycle of forests that are continually establishing, growing and dying. You cannot reserve all old growth because it is always coming and going as part of the forests lifecycle. Old growth needs to be managed not reserved.

Did you know that?

- In East Gippsland there are 224,000 hectares of old growth.
- Of this area only 34,000 hectares (15%) is available and suitable for harvesting.
- There is an additional 123,000 hectares of negligibly disturbed forest in reserves that will become old growth in the next 50 years.
- Old growth forests are protected from harvesting and will increase in the future. The old growth forests of East Gippsland have already been saved.

Did you know that?

- Old growth forest is defined by the Commonwealth and Victorian Governments as,
 - forest that is ecologically mature and has been subjected to negligible unnatural disturbance.
- This definition requires the forest to be old and undisturbed.
- The Australian Conservation Foundation defines old growth forest as forests that have not been logged.

Did you know that?

- The sustainable native forest timber industry in East Gippsland employs 459 people and has a turnover of \$122 million per year.
- The industry is one third of the total regional economy.
- The industry keeps alive the towns of Orbost, Cann River, Bendoc, Nowa Nowa and Buchan.
- The native forest timber industry is highly regulated and controlled by the Victorian Government. It follows environmental codes and is harvesting the forests at rates less than they are growing.
- The industry must maintain its activity at current levels if it is to invest in new equipment, value adding, improved safety and the development of new markets in Victoria and overseas. A smaller industry will stagnate and wither under uncertainty and declining investments. Jobs will be lost and towns will close down.
- The Victorian Government spent \$80 million to make the industry sustainable with the Our Forests Our Future policy. Now that it is sustainable there are no further reductions required. The forests are growing faster than they are being cut down.

Did you know that?

- Forests are dynamic, growing and changing. The regrowth forests of today are our future old growth forests.
- Old growth trees will eventually die and be replaced.
- Old growth forests can be rich in diversity or they can be just old and slow growing.
- Old growth forests can be magnificent, tall and iconic or they can be scrubby, short and gnarled.
- The best and rarest old growth forests were identified by the Regional Forest Agreement process and reserves were created to protect them.

Did you know that?

- The old growth forest where harvesting is allowed are the most common types and generally occur in small patches.
- Individual old growth trees are protected by prescription or are retained as habitat trees and seed trees in the areas available for harvesting.
- The 34,000 hectares of old growth that is available for harvesting will be progressively harvested over the next 50 years. After this time the regrowth forests established after harvesting in the 1960's will be old enough to harvest again.
- In a sustainable forest harvesting regime the oldest trees are harvested first because they are the slowest growing and are big enough for sawing. They are replaced with young fast growing regrowth forests that provide forests and timber for our great grand children. The regrowth forests must be protected from harvesting and wildfire for 80 years so that they can reach their full potential.

Did you know that?

- Wildfire is the biggest threat to old growth forests.
- Wildfire can destroy large areas of old growth forests in a matter of weeks.
- The 2003 Alpine fires, which burnt 1.3 million hectares, destroyed a great deal of old growth forest.
- Wildfires are difficult and expensive to contain.
- A viable timber industry can assist to control wildfires by providing:
 - a viable , well maintained road network suitable for tanker access,
 - a fleet of heavy machinery already located in the forest,
 - and a workforce of foresters, contractors, machine operators, tree fallers and CFA volunteers able to be deployed to a wildfire.
- Wildfires are expected to occur on cycles of 20, 100 to 300 years depending on the climate, slope and exposure of sites.

- Native eucalypt forests have adapted to these cycles of repeated disturbance. This makes them adaptable to active management such as timber harvesting and fuel reduction burning.
- It is the cycle of wildfires that makes old growth rare not timber harvesting.

Did you know that?

- Viable tourism and timber industries can coexist.
- Investment in tourism infrastructure is dependant on expected returns, expected visitor numbers and a willing investor. It does not need the timber industry to be removed from the forests before the tourism industry can move in.
- All iconic natural features likely to attract visitors are already in National Parks and tourism investment has occurred and visitor numbers are in decline.
- In rural Victoria tourism is already at its full potential and the rural economies need both (timber and tourism) industries to be viable to provide stability during fluctuations and market cycles.

Did you know that?

- There is not a quick fix to the old growth issue
- It is not possible to just say that all old growth is protected because the definitions and expectations are different.
- Green groups have changed the definition of old growth forest to include mature and regrowth trees.
- Old growth forest is mapped from aerial photographs and can be misinterpreted. The amount of old growth is dependant on the scale of the photos.
- On the ground old growth forest can contain up to 10% regrowth trees. These mixed age forests can look like ordinary mature forest.
- Most coupes contain some old trees. Coupes are located to include older trees. These are the trees that are due to be harvested. Coupes with young regrowth trees are left to grow and be harvested in the future.
- Most coupes will be subject to disputes as to whether they contain old growth or not, especially given the ACF definition of old growth.
- Current planning frameworks will disintegrate and the Sustainable Forest (Timber) Act will become unworkable.
- Uncertainty for VicForests and the industry will stop investment, breach contracts and jobs will be lost.
- The most robust position is to recognise that 85% of old growth is protected and allow the harvesting of the balance of the most common and least significant old growth to continue sustainably.

Old Growth Forest - A Review of the Facts

The Victorian Timber Industry is deeply concerned that the political campaign to “save” Victoria’s old growth forests is based on misrepresentations and statements that are untrue. The current policy frameworks for the protection of old growth forests and the establishment of a sustainable native forest timber industry are based on a wealth and depth of scientific knowledge that needs to be re-introduced into the debate on the future of Victoria’s old growth forests.

The arguments for maintaining access to the very small proportion of old growth that is available for sustainable harvesting are very strong. The social and economic benefits of maintaining the timber industry in county Victoria are considerable. The industry’s sustainability is an enormous benefit to Victoria, given that timber can be regrown, reused, recycled and is carbon positive. The future of the industry is positive given the new round of investments that have commenced and the installation of an open market system. The tourism industry is often held up as an alternative to the timber industry, this myth needs to be dispelled. The real threat to old growth forests is not the timber industry but wildfire. These arguments are presented in more detail below but firstly old growth forest needs to be defined.

Old Growth Forest. What does it mean?

Victoria has lead the world in the protection of old growth forests. The study of old growth in East Gippsland in 1994 was the first to take the definition of old growth forests from the National Forest Policy Statement and make it operational and measurable. This original mapping of the old growth forests was used to create a network of reserves in the East Gippsland Forest Management Plan that were used as the basis of the Regional Forest Agreement for East Gippsland, the first in Australia. The history of protecting old growth forests is long and thorough.

The National definition¹ of old growth forest is that:

Old growth forest is forest that is ecologically mature and has been subjected to negligible unnatural disturbance such as logging, roading and clearing. The definition focuses on forest in which the upper stratum or overstorey is in the late to overmature growth phases.

This definition is science based and now widely adopted. At the time there were at least 15 other definitions proposed. To make the definition workable requires consideration of the effect of the unnatural disturbances because their impacts fade considerably over time. The Victorian definition² that is compatible with the National definition and can be used operationally is:

¹ National Forest Policy Statement. A New Focus for Australia’s Forests. Commonwealth of Australia 1992, 52pp.

² A Study of Old-Growth Forests of East Gippsland. Department of Conservation and Natural Resources, Victoria. March 1994. 223pp.

Forest which contains significant amounts of its oldest growth stage in the upper stratum - usually senescing trees - and has been subjected to any disturbance, the effect of which is now negligible.

This definition is important because it can be measured and states that if the effects of any disturbance have vanished then you can't map it and it should be ignored. The definition of significant amounts of oldest growth stage is also important because this definition allows for up to 10% of the upper stratum to be regrowth provided the oldest growth stages dominate.

These are the scientific definitions. The Australian Conservation Foundation³ has a definition for old growth that is:

Forest that has not been, or has been minimally, affected by timber harvesting and other exploitative activities by Australia's European colonisers.

This definition includes all un-logged regrowth forests as old growth. By this definition nearly all of Victoria's forests are old growth. This is why the issue of old growth forest will remain on the agenda because there is not agreement as to what it is.

All forests are dynamic, they are growing and dying constantly. They are part of the great cycle of life. In Australia the main driver for these changes are wildfires. They kill large numbers of eucalypt trees and allow the conditions for seedlings to germinate and start the life cycle over again. The young seedlings grow into regrowth forests and if a wildfire does not return for more than 200 years they can become old growth forests. The eucalypt trees in old growth forests are senescing. This means their crowns have matured and are starting to dieback. They have many obvious dead branches and are replacing their primary crown with less secondary crown. These trees have a limited life and will eventually die and are replaced. If they die in a wildfire their seeds will have the opportunity to germinate and grow. If a fire does not occur they will be replaced with trees of other species that can regenerate without fire. The management of old growth forest must recognise these ecological facts.

As explained Victoria has a history of protecting old growth forest that it can be proud of. It has resulted in the protection of old growth forests at levels that exceed the requirements set down for the Regional Forest Agreements.

Victoria's history of repeated severe wildfires has reduced the area of old growth forest to 15% of the total forest area. This is to be expected ecologically and statistically as a wildfire every 100 years results in 10% of the forest aged 10 or less and 14% of the forest greater 200 years old.

³ Submission 332 to the Resource Assessment Commission in Resource Assessment Commission 1992 Forest and Timber Inquiry Final Report. Australian Conservation Foundation. 1991.

In East Gippsland, where much of the debate on old growth forest is centred, there is a very high level of protection for old growth⁴. There are 225,000 hectares of old growth forest of which only 34,000 hectares is available and suitable for sustainable timber harvesting. Only 15% of the old growth will ever be harvested for timber.

Across the whole of the state's forests there are 841,000 hectares of old growth forest⁵. Of this area only 150,000 hectares or 18% is available and suitable for sustainable timber harvesting. Old growth forests are adequately protected in Victoria.

There have been calls to save the last of the old growth forests from harvesting in East Gippsland. This is patently not required. The best, rarest and most consolidated old growth forests are already in reserves. A small amount remains unprotected and is the base resource for a sustainable industry. The last old growth forests are protected, the first old growth forests are managed sustainably.

Social and Economic Benefits

The social and economic benefits derived from our native forests are significant. A sustainable timber industry derives a significant proportion of these benefits. Old growth forests are an important part of the resource base for these industries.

Across the State 7,700 people are directly employed by the native forest timber industry⁶. The net value of the output from these industries is \$1.2 billion.

Provincial Victoria is growing in population and business opportunities according to the advertisements on television. The Timber Industry contributes significantly to those achievements.

The regional economy of East Gippsland is dependant on the native forest timber industry for the survival of towns such as Orbost, Cann River, Bendoc, Nowa Nowa and Buchan. The industry each year provides⁷ 460 direct jobs, \$122 million turnover, wages income of \$18 million and public sector payments of \$16 million in the East Gippsland Shire that only contains 35,600 people.

The native forest timber industry has a long and proud history in the forests of East Gippsland. The first sawmill opened in 1870 to supply local markets. The industry grew significantly due to the wealth of forests present, the 1939 fires

⁴ Forest Management Plan. East Gippsland Forest Management Plan. Department of Conservation and Natural Resources, December 1995. 136pp.

⁵ Old Growth Forests in Australia, Conservation status and significance for timber production. Science for Decision Makers. Bureau of Rural Sciences. Department of Agriculture, Fisheries and Forestry (Aust). March 2004. 8pp.

⁶ Socio-economics of the Forest & Forest Products Industry in Victoria. J.N. Cameron. October 2005. 33pp. Available at www.vafi.org.au.

⁷ The Timber Industry in Gippsland: a Socio-economic Assessment. Gippsland Private Forestry Inc. September 2005. 84pp. Prepared by MBAC Consulting.

destroying much of the forest closer to Melbourne and the housing boom of the 1950s and 1960's. The industry had had little impact on much of the forest estate so by the 1980's and 1990's large areas of wilderness forests were included in National Parks. Today a sustainable industry exists on the areas of mature and old growth forests. In the future the industry will harvest again the forests harvested and regrown in the 1950's and 1960's.

Sustainability

The Victorian Native Forest Timber Industry is proudly sustainable and this has been confirmed by the Government's⁸ Sustainability Charter for Victoria's State forests which states:

As a global citizen, Victoria has a responsibility to sustainably manage its forests and to minimise impacts on threatened forest communities in other, less regulated, jurisdictions. It should be recognised that timber sourced from Victoria's public forests is of high quality and should be promoted as sustainable, durable and often unique product.

The Native Forest Industry achieves its sustainability through the comprehensive legislative and regulatory framework within which it operates. There are 5 Commonwealth and 17 Victorian Acts of Parliament that control forestry operations⁹. The environmental performance of forestry operations is controlled by the Code of Forest Practices for Timber Production (1996). The code is a set of standards that must be met. Penalties for operators apply for breaches of the code¹⁰. New regulations are in draft to update the provisions for licensing and penalties for operators who breach the code¹¹. The performance of the industry against the standards in the code is audited each year and steps are taken to continuously improve performance¹².

A simple measure of sustainability is that the forests should be growing faster than they are being cut down. During 2004-05, 529,100 m³ of sawlogs were produced from Victoria's public native forests including 53,500 m³ from dead trees left after the 2003 Alpine fire¹³. The productive forests in Victoria are growing at between 0.5 and 3.0 m³ of sawlog per hectare per year¹⁴. A conservative average growth rate is around 1.0 m³/ha/yr. There are 740,000 hectares of forest suitable and available for timber production⁹. Therefore these forests will grow at least 530,000 m³ of new sawlogs each year to replace those that are harvested. The total state forest area grows 1.5 million m³ of new sawlogs each year and all of the forests in Victoria grow 5 million

⁸ Sustainability Charter for Victoria's State Forests. Department of Sustainability and Environment May 2006. 7pp.

⁹ Victoria's State of the Forests Report. Department of Sustainability and Environment. 2005. 230pp.

¹⁰ Timber Harvesting Regulations. Statutory Rule Number 81. Victorian Government. 2000.

¹¹ Regulatory Impact Statement. Sustainable Forests (Timber Harvesting) Regulations 2006. Available at www.dse.vic.gov.au.

¹² Environmental Audit. Timber Production on Public Land 2005. Findings and Recommendations. EPA Victoria. February 2006. 189pp.

¹³ Monitoring Annual Harvesting Performance. Statewide Summary Report 2004-05. Department of Sustainability and Environment. March 2006. 35pp.

¹⁴ East Gippsland Forest Management Area Estimate of Sawlog Resources. Department of Natural Resources and Environment. March 2002. 34pp.

m3 of new sawlogs each year. Current harvesting rates are clearly sustainable well into the future.

Sustainability is defined so as to ensure that the needs of future generations are provided for. So where will future generations get their old growth forest? In East Gippsland there is a resource of future old growth⁴, it is called negligibly disturbed forest and there are 285,000 hectares of it and 71% of it will not be harvested. In the absence of wildfire for the next 50 years the amount of old growth forest will increase. The account looks like this:

Opening Balance 2006	
Old Growth Forest East Gippsland 2006	225,000 ha
Debits	
Sustainable Harvesting to 2056	-34,000 ha
Credits	
Negligibly Disturbed Forest in Reserves	203,000 ha
Closing Balance 2056	
	394,000 ha

The amount of old growth in East Gippsland will increase over the period to 2056. This is sustainable forest management.

Sustainability is also defined so as to protect current natural values including old growth. So why is it that when setting the reserve criteria for the Regional Forest Agreements all old growth was not protected?

The reserve criteria were set independently before the assessments were done. The criteria did not have to trade off against social or economic issues. They were developed by the JANIS technical working group made up conservation scientists and planners from all states and the CSIRO. It ran under the auspices of the Joint ANZECC/MCFFA National Forest Policy Statement Implementation Sub-committee (JANIS)¹⁵. The criteria provided a workable definition of old growth as:

Old growth forest is ecologically mature forest where the effects of disturbances are now negligible.

The criteria have an ecological basis. Where old growth is rare or depleted all viable examples should be protected. This has been achieved in Victoria.

Where old growth is common, 60% should be protected. The best 60% should be protected to ensure representation across geographic ranges, maximum biodiversity values are protected, the largest areas of old growth are protected, there is an appropriate reserve design and the community's needs for recreation and tourism are catered for. This is also achieved in Victoria.

¹⁵ Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia. A report by the Joint ANZECC/ MCFFA NFPS Implementation Sub-committee. Commonwealth of Australia, 1997. 24pp.

The criteria did not specify that all old growth be protected because it is an ecological risk to have all of your forest in reserves represented by the oldest growth stage. For your reserves to be sustainable they must have healthy amounts of young forest, mature forest and old forest. This is the case in Victoria⁹.

To achieve sustainability you must demonstrate adaptive management and apply the precautionary principle. These are both achieved in Victoria's State forests. Adaptive management is required to adjust your planning to account for newly discovered values and be able to protect them accordingly. The Forest Management Plans achieve this objective. In East Gippsland all new occurrence of Long Footed Potoroos are protected and the flexible system of Special Protection Zones is applied⁴. In Central Gippsland the Baw Baw Frog was protected when it was discovered for the first time outside the Baw Baw National Park¹⁶. The precautionary principle is applied by limiting the time and scale of harvesting operations to those that can be sustained immediately¹⁷ and by establishing reserves for known and expected values⁴.

To maintain a sustainable timber industry there must be certainty to allow for investment in new technology and to maintain the competitive position of the industry as a whole and the individual firms within the industry. This certainty has to come in a cycle longer than the parliamentary terms. The Sustainable Forest (Timber) Act 2004 was deliberately drafted and amended to provide that certainty for 10 years. It is inappropriate to change forest policy before the ink is dry on this important legislation.

The Timber Industry is sensitive to the concerns of the general public who see logging coupes and are concerned about the apparent destruction of their forest. These coupes look terrible but they are the construction site for a new forest that will be restored to ecological capacity and be able to provide timber for our great grand children. A new building should not be judged by how it looks in the early stages of construction when the foundations are laid and forest management should not be judged by the appearance of a freshly harvested and burnt coupe. The new forest that is returned to the coupe is the ultimate environmental success story because a functioning natural ecosystem has provided our community with much needed resources in a sustainable manner.

Timber, Naturally the Environmental Choice.

Old growth forests are sustainably harvested to produce high quality sawn timber that is an environmentally friendly structural product suitable and desired for furniture and building applications. The forests are not harvested for woodchips.

Woodchips are produced as a residual by-product from the harvesting and sawing processes. The use of residual by-products is common in primary production industries, such as using sugar cane waste for ethanol production,

¹⁶ Forest Management Plan Central Highlands. Department of Natural Resources and Environment, Victoria. May 1998. 149pp.

¹⁷ Sustainable Forest (Timber) Act 2004. Victorian Government. Act Number 48/2004. 102pp.

stock feed from corn crops, sausages and mince steak from butchers. All sustainable industries must use their by-products to maximise value and minimise waste.

Sawn timber is an unrivalled environmentally friendly product. It is regrown, reused, and recycled. It is greenhouse friendly as it stores for significant periods carbon taken from the atmosphere¹⁸. Kiln dried hardwood sawn timber has 19 times less process energy requirements than galvanised mild steel.

Demand for hardwood timber is growing although annual demand fluctuates with the housing market cycle. Demand increases with population increase and increases in the average standard of living of Victorians. Increasing demand is being met from imports as production from Victoria's forests has been cut to meet the sustainability requirements¹⁹. Further reductions in the Victorian hardwood resource base will result in increased imports. As good global citizens Victorians should not shift the impact of their need for hardwood timber overseas. Victorians should sustainably manage their own forest as is currently the case.

Australia has a trade deficit in timber and timber products worth \$2 billion per year. Increases in imports will further affect our balance of trade.

Investments in the Future

The Victorian Government has publicly committed to a sustainable native forest timber industry^{8 19}. It has supported this with legislation¹⁷. The industry has responded by a new round of consolidation and investment. These investments must be maintained if the industry is to compete against alternative products and imports and to stay in the market. This is the same in any industry. Continuous improvement is required to just survive.

The native forest timber industry can continue to increase its economical and social contribution to rural Victoria by continuing to invest in value adding. Some sawmills can now produce furniture components rather than just sawn timber. This current round of investments will generate further value adding with the associated benefits of value production and employment.

These investments will dry up if uncertainty about the future resource base for the industry is increased at each state election.

The Victorian Government wanted an open and transparent method to price and allocate sawlogs¹⁹. This has been delivered by VicForests with their online auction system. It creates a great deal of uncertainty for the existing businesses as they don't know how well they will be able to compete for the resource. It provides certainty for the industry as a whole provided all of the available resources are put to the market. These reforms have modernised

¹⁸ Wood - another low carbon footprint solution. CSIRO Publications. ECOS 129 March 2006. Pages 12 - 13.

¹⁹ Our Forests Our Future, Balancing the needs of the Community, Jobs and the Environment. Victorian Government Policy Statement. February 2002.

the industry at a considerable investment cost to Government and the private sector. These investments will be lost if the industry is to have resource withdrawn for no gains in sustainability.

The Government's investment in VicForests itself is under threat by resource withdrawals. VicForests maintains its operations on the revenue it collects and employs 135 people mostly in regional Victoria. Resource withdrawals will result in less revenue, increased costs and staff cuts. Government employees will be made redundant. VicForests provided a net profit after tax of \$8.2 million²⁰ for its first year of operation 2004/05. This will be seriously eroded by resource withdrawals as many of the fixed costs remain and economies of scale are lost.

Alternative Industries - Where are they?

Tourism is often portrayed as an alternative to the timber industry that produces social and economic benefits from forests. However the types of forests used by these two industries are generally mutually exclusive. There is already a strong tourism industry in regional Victoria producing social and economic benefits from the iconic forests and natural features that are already included in the National Park and conservation reserve networks. The balance of the forest that is available for timber harvesting is mostly common and better examples are already included in the park network. The limiting factors to the growth of tourism are investment in infrastructure and visitor numbers not additional areas of National Park. These two industries currently coexist in regional Victoria and can continue to do so.

The Tourism Industry is subject to the same market fluctuations as all businesses. It does not have unlimited potential. It is currently in a slump with domestic overnight visitors to regional Victoria decreasing by 10%²¹.

A robust regional economy should not rely on one industry alone. Regional economies need both a strong timber industry as well as a strong tourism industry. The industries can coexist and where they do they can share infrastructure costs such as roading. Roads constructed and maintained for the timber industry can provide access to the forests by tourists.

The future industries that can use products from sustainably managed native forest will be attracted to the carbon sequestration benefits and fossil fuel offsets. Bio-fuels and ethanol can be produced from waste from the harvesting and processing industries. Woodchips are currently converted to paper, however in the future re-engineered timber and panels could be manufactured from the same residual materials. Charcoal and activated carbon are also possibilities. The products from sustainably managed forests are endless provided the right policy framework is present to allow the investment.

²⁰ Annual Report 2005. VicForests. Melbourne. 48pp. Available at www.vicforests.com.au.

²¹ National Visitor Survey, Year ending December 2005, Tourism Research Australia. Produced by Tourism Victoria Research Unit, April 2006.

The Real Threat

In the natural world the destroyer of old growth forest is wildfire. Wildfires are a periodic and regular occurrence in Victoria's forests. The forest ecosystems have adapted to these occurrences and some forest types are dependant on wildfire to survive. The old growth occurs naturally in areas that have remained unburnt for long periods. In old growth eucalypt forests this generally is by chance as fire will have to occur eventually to allow the eucalypts to regenerate. They cannot regenerate without a fire and fire will kill many of the older trees. Burning in eucalypt forests is inevitable. Active management can introduce fire under controlled circumstances to meet ecological objectives and to minimise the impact of wildfires when they do occur. Active management is often difficult on land tenures dedicated to conservation as there is an expectation that only natural processes are allowed.

A viable native forest timber industry can assist in the protection of old growth forests from wildfire in a number of ways.

State forests have a network of roads that provide access to all forest users. The roads constructed and maintained to provide access to timber traffic are also available for fire fighting traffic. This road sharing considerably reduces the costs of fire protection.

Viable timber industries provide viable rural communities that provide the volunteers for the Country Fire Authority. The timber industry also provides experienced forest workers from the harvesting and haulage sectors and sawmills directly to the Department of Sustainability and Environment on contract. These contract workers are skilled and experienced in fire fighting. They are also only called when needed again greatly reducing the cost of fire fighting.

The timber industry also provides heavy equipment for the fire fighting effort. Bulldozers, skidders, floats and graders used in forestry operations are called on to fight fires. These are often located in the forest for their normal duties so can reach many fires before more distant equipment can be brought in. Experienced operators for the machines are also available. Again the costs of fire fighting are reduced because of the experience, the location and the call when needed basis of the machines availability.

Risks to be Considered

The environmental risks to old growth forests are wildfire. The social risks caused by the withdrawal of the small amount of old growth that is allowed to be harvested are the closure of five rural towns in East Gippsland. There are also reputation and management risks that need to be considered.

The issue of old growth will not be removed from the political agenda even if moves are made to unnecessarily protect more than the current adequate protection levels for old growth forests. This is because there is no agreement with ENGOs as to the definition of old growth. All coupes scheduled for harvesting contain some old trees. These will be claimed as old growth

irrespective of the mapped status. This uncertainty to scheduled operations will result in VicForests being unable to supply existing contracts and the industry will have to take action in the courts to protect its livelihood. Protesters will blockade contentious coupes and police actions will be required to maintain community safety.

The ENGOs will want to protect all trees older than 80 years. Sustainable management of forest is about harvesting the oldest trees and leaving the youngest trees to grow on wherever possible. It is about providing a range of ages so that the forests are perpetuated. 80 years is the nominal rotation age.

They will not stop until there is no industry left at all. This is of course their long term objective.

Further to these risks there is an operational consideration that may undo all of the good work done to date in protecting old growth and providing resources for a sustainable industry. The mapping used to derive the Comprehensive, Adequate and Representative Reserve system that protects our old growth was done at a scale of 1:100,000²². The Department of Sustainability and Environment has a successful program (Statewide Forest Resource Inventory) to map all state forest at the scale of 1:25,000, four times more accurate²². The location, extent and value of old growth mapped at this scale will be considerably different to the old mapping. This will test the validity of much of the Special Protection Zones created to protect old growth. The East Gippsland Forest Management Plan is due for its 10 year review this year⁴. The review must be based on the new mapping and done in an orderly and scientific manner. This new mapping will cause enough uncertainty without any other shifts in policy.

Reality Check

Victorians want their old growth forests protected and they want to use hardwood timber sourced for sustainably managed forests. The current legislative and policy framework delivers both these expectations.

The drivers to change the policy framework are not scientific or realistic. Old growth is not threatened by timber harvesting. Any reductions to the resources available for the sustainable timber industry will cause social disruption to rural Victorians and result in additional harvesting of forests in other countries to supply our additional imports.

The current policy framework is robust, scientific and delivers good environmental outcomes. Additional protection for old growth forests is unwarranted and will deliver negative economic and social outcomes for rural Victorians.

²² SFRI Victoria's Statewide Forest Resource Inventory Program Overview. Department of Natural Resource and Environment. Forest Service Technical Report 97-1. March 1997.