

# Submission to Natural Resources Commission on the mid-Murray River Red Gum forests

*Wood is far and away the most abundant renewable material on earth. It is disheartening that so many who call themselves environmentalists are campaigning against forestry when the alternative building materials are concrete, steel, plastic and more use of fossil fuels.*

Dr. Patrick Moore PhD, co-founder of Greenpeace.

Dear Commissioners,

Thank you again for the opportunity of participating in the assessment process as an independent citizen from a small community which is reliant to some extent on the local timber industry. I am sorry this is a lengthy essay but I operate on the theory that the more facts available the more likely it is that sound policy will result.

I have given details of my background in my submission on the Terms of Reference but would like to add this further comment.

I support the concept of national parks where they are shown to be the best solution to the continued preservation of unique landforms or for the ongoing protection of species that without them might be under serious threat. I have found no evidence that either of these conditions apply to the local river red gum forests.

I do *not* support the waste of useful natural resources which can sustainably provide us with goods and materials that are demonstrably kinder to the environment than alternatives, provided that there is sensible protection for all dependent species while processing those resources.

I also have some doubts that national parks as we now define them are necessarily the best available land management practice; a suspicion reinforced by the NSW Government's decision to set up its Task Force on Tourism and National Parks last year.

The formidable task you face in your assessment of the Riverina red gum and cypress forests is evident from the amount of work that has gone into producing the preliminary report on the red gum forests. It is comprehensive and even-handed and gives me great confidence that a good outcome will result.

## **Comment on submissions on the Terms of Reference**

Reading through the submissions on the Terms of Reference published on your website I find a clear pattern. A great deal of research, thought and science has been invoked by those who favour a continuation of the current management of the red gum forests.

On the other hand, those urging you to create more national parks have presented in the main a series of "bullet points", sometimes reworded but essentially copied from the websites of environmental lobby groups. These websites encourage their followers to do so.

Statements like "the bigger and older trees are the ones taken by the timber getters" demonstrate a lack of understanding of modern harvesting regulations which are designed to do in fact just what that writer is urging; secure the habitat by retaining the bigger and older trees.

Many insist that you invoke the precautionary principle but then demand that you act with great haste because of some looming twelfth hour. Surely we should note the presence of "caution" within that overused phrase.

You are told these are "the largest remaining red gum forests on earth", implying that some have

already disappeared. These forests predominantly grow on flood plain deltas, unsuitable for cultivation, which essentially remain intact in area and now contain far more trees than when European settlement began. These are not the ancient forests some would have us believe. As I explained in my submission on the terms of reference, they have a very short history, probably less than 200 years. They have undeservedly been given icon status, probably initially by an over-enthusiastic advertising copy-writer.

*Eucalyptus camaldulensis* vies with *E. globulus* for the title of the most widely planted gum tree in the world, with very large plantations on every inhabited continent. It is widely distributed in all the mainland states of Australia but does not occur naturally in Tasmania – a legacy of its recent origin. Of itself it is not in need of any protection except from exceptional droughts and fire.

Surveys, anecdotal evidence and personal recollections agree that there are now more trees in the Millewa forest than in living memory.

The normal growth habit of the river red gum is as a narrow belt lining stream banks. It is only where they have encountered alluvial fans with high watertables that they have formed forests, and that has only been since large-scale aboriginal burning ceased and locks/weirs have altered the watertable. They should therefore be regarded, as they have been described by aboriginal elders, as “white man’s plantations” or “white fella’s weeds.” We should continue to harvest them in the sustainable manner that has evolved over a century of improving knowledge and management.

## **Comments on the preliminary report**

### **1.6 Key issues for submissions. Page 15**

The commissioners have identified nine key issues and sought community input.

#### **Issue 1: Have the values supported by the forests been adequately described?**

In my view the commissioners have produced a balanced report. They have arrived at their conclusions after interviews with most stakeholders and following considerable research. The report clears up many of the misunderstandings and misinformation on this emotive issue.

#### **Issue 2: What other information is available to inform the assessment, particularly on areas outside the Central Murray?**

I am not aware of any such information for outside the central Murray. A copy of Peter Donovan’s *A History of the Millewa Group of Forests* published in 1997 by State Forests might provide some further background information. Charles Sturt’s accounts of his 1838 droving expedition through this region are also instructive. Vic Jurskis (*Forest Ecology and Management*, In press 2009) has produced a valuable summary of probable pre-European conditions in the cypress and red gum forests using many historical records from the earliest explorers and settlers.

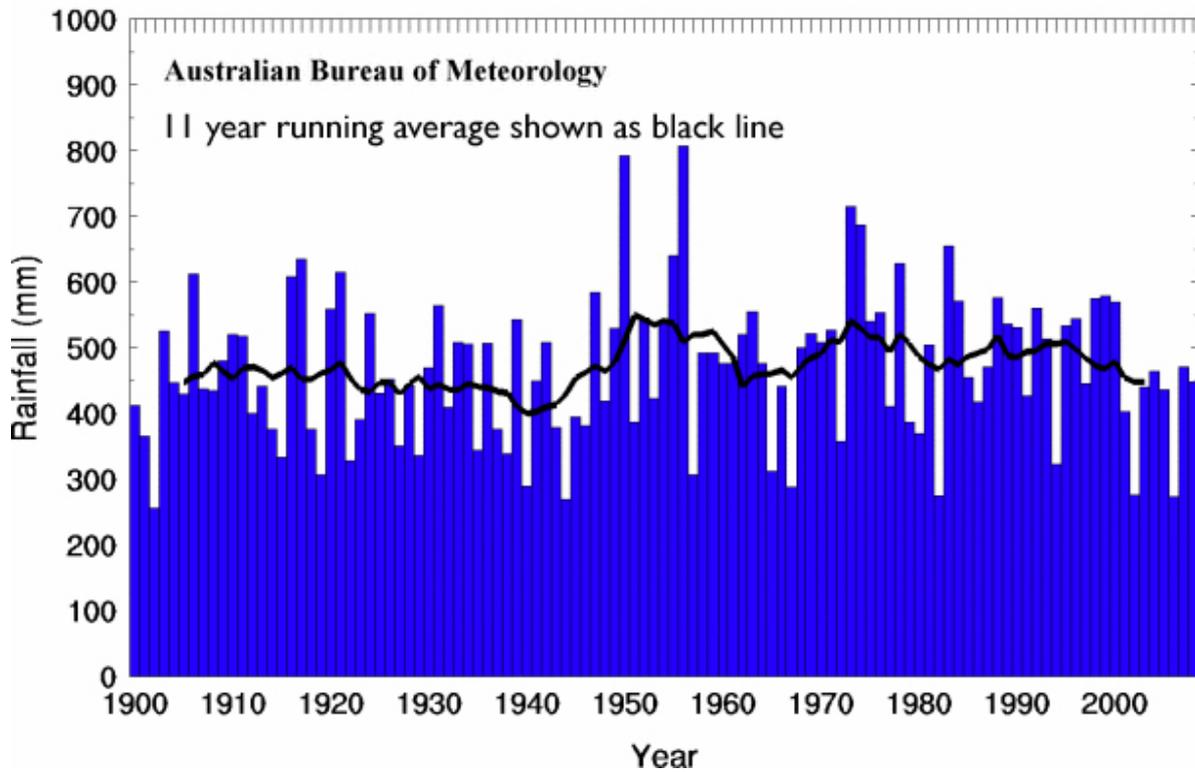
#### **Issue 3: How will river regulation, climate variability and climate change affect the forests and the values they can support in the future?**

The commissioners have summed up this pivotal issue in one sentence: “Forest management is more critical in these forests than in any other forest in NSW, as it is intrinsically interwoven with flood dependency”. The forests cannot survive on the average rainfall of this region, they need floods. If drought conditions continue parts of these forests will inevitably die.

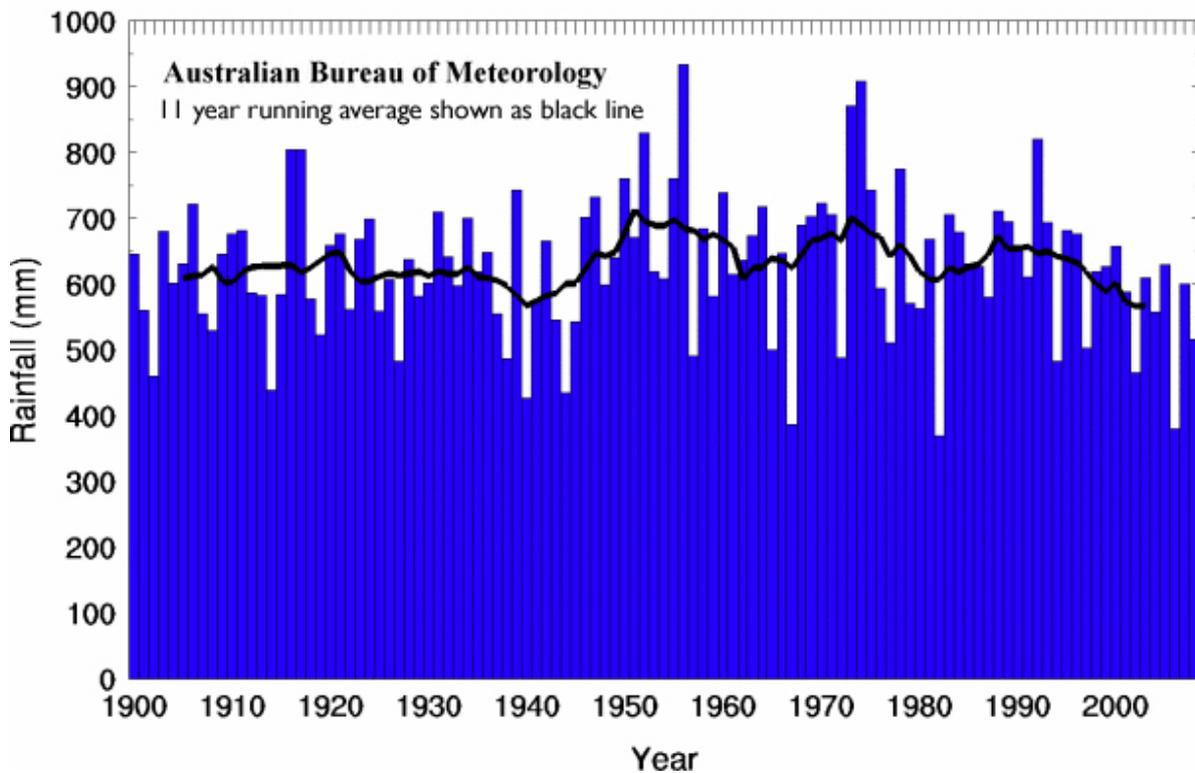
The commissioners would no doubt be aware that the Victorian Environmental Assessment Council calculated that the Barmah (and by default Millewa) forest required 4,000 gigalitres every five years. That is about the capacity of Dartmouth dam. Even if that water could be bought and stored, the cost and the logistics of delivering it without causing major problems upstream would be enormous.

There have been great droughts in the past, but they were at a time when these forests did not exist in their present form. One thing is certain. Putting them in national parks will not save them.

**Murray Darling Basin Annual Rainfall**



**Southeastern Australia Annual Rainfall**



I see nothing in these two graphs to cause alarm over the current drought. It should be noted that part of the great Federation drought is off the graph to the left.

#### **Issue 4: What are the key forest values and core ecological processes we should seek to maintain in this dynamic context?**

We should of course try to maintain as much as we can of the present eco-system but always conscious of the fact that extinction is part of the evolutionary process.

Providing a continuity of habitat trees will be best achieved by keeping the trees thinned. Thinning ensures that growing trees have better access to scarce water resources in time of drought. Only large trees are capable of becoming habitat trees. Therefore our efforts should go into growing large trees, reserving some as “recruits”, while ensuring that there are adequate foraging resources for the dependent wildlife. The ability of the forests to regenerate after flood events is well documented and after such events thinning will also be required to ensure the forest is better able to cope with future droughts of the current magnitude. The ability of the forests to regenerate after extensive thinning should also be acknowledged.

#### **Issue 5: What approaches should we take to maintaining the forest values and processes through the transitions that seem inevitable?**

If we want to retain these forests we must accept that they require much more thinning in order to make more water available to the trees that have the potential to develop into good sawlogs and habitat trees. More water would help but finding and delivering it will be difficult.

The graphs on the previous page indicate that the present rainfall pattern is not unusual.

However demand for irrigation water has risen considerably since the wet years of the 1950s and is unlikely to fall. Therefore environmental water would need to be purchased for the forests if we are intent on keeping them well watered. Radical new strategies for delivering it are required.

#### **Issue 6: What are the key features of a sustainable future for the forests, forest industries and the local communities?**

Obviously the key to a sustainable future is keeping as much of the forest alive as possible. The best way to ensure this outcome and at the same time to provide opportunities for the timber industry is to thin the trees quite dramatically. This implies that all compartments within the forests should be opened for harvesting. The fact that self-appointed NGOs have been allowed to force the closure of most of the best compartments in the mid-Murray forests is a scandal. Eleven compartments in the mid-Murray are currently shut down as a result of meddling by unappointed, unelected environmental lobbyists. If wide-scale thinning is done and Forests NSW are allowed to manage properly, unhindered by vexatious court proceedings, the sustainability of industry and local communities ceases to be an issue, particularly if realistic resource security is introduced.

#### **Issue 7: How can local communities transform to cope with less water?**

By this I presume is meant "how can local communities adapt to using less water so that more environmental water is available for the forests?" There is already a growing awareness of the need to drought-proof gardens - a major user of domestic water. Provided the communities understand that their timber industries have resource security there will probably be acceptance of the need. However people need to be made aware of the fact that lawns and thirsty plants are not the only type of garden. We need to look more at what communities in arid places like the desert states of the USA are doing and to restyle our gardens accordingly.

#### **Issue 8: How can forestry industries respond to declining wood yields?**

If the forests are adequately thinned I can see no reason to suppose that wood yield will decline

severely. Obviously the industry will need to do even more value adding and may need to develop other marketing opportunities to deal with the necessary thinnings.

One of the most positive things that could be done to improve yield is to have restrictions, imposed as a result of court action by lobby groups, lifted. Actively managed forestry is *the* most sustainable industry in the state and provides healthy multi-aged forests for wildlife. Yet those calling for a reduction of non-sustainable fossil fuel use want sustainable logging stopped. It beggars belief!

### **Issue 9: What are the appropriate policies and institutional arrangements to manage these forests through such a challenging and uncertain future?**

Forests NSW and the timber industry already have the knowledge and expertise to help these forests cope with drought conditions. What is required is a massive change in public perceptions, particularly in remote cities so that people understand the need to actively manage the forests.

I would now like to comment on further issues that I see as important.

#### **Section 3.6.1** Page 101 of the preliminary report.

It is disappointing to see that the commission apparently intends using Choice Modelling to arrive at a value for various aspects of the forests.

Choice Modelling is still considered a controversial technique. Persons interviewed are asked to say how much they would be prepared to pay for various outcomes. The problem is that they are not asked to put up the money and the answers can be influenced by the way a question is framed.

Worse yet, the commissioners want to use figures supplied by the Victorian Environment Assessment Council. This despite quoting an example which showed that while people in Gippsland and Melbourne said they would be prepared to pay \$3.29 and \$1.45 respectively for 20 years in order to have an increase of 1,000 hectares of “healthy forest” (a debatable quality in the context), the people who lived in the area to be affected put a value of seven cents a year on the same result. The problem here is that the people who said they would be prepared to pay the highest price were people who were the least likely, by reason of distance, to have visited or to ever visit and enjoy the result of their fictional investment. It is misleading to call the results “economic benefit”.

The VEAC study would have been fairer had it pointed out to respondents that their choice would inevitably impact on jobs and indeed on whole communities and may well cause a shortage of timber which would raise prices or increase imports.

The terms of reference for VEAC were different and their data may be inappropriate for NSW. It should be noted too that VEAC did not attempt to model the economic impact of their findings but merely stated that those communities affected would have to bear the brunt of their recommended outcomes. Their modelling was purely to establish a dollar figure to put on the forests.

My interpretation of that is that the Choice Modelling exercise was mere, if expensive, window-dressing, designed to put a theoretical dollar value on the national parks that VEAC were intent on establishing. I would be disappointed to find the same mindset operating in NSW.

I propose a more realistic survey in which respondents are asked to donate water from their domestic supply to these forests. I believe the results would be more realistic. Proving me wrong might solve the water shortage.

#### **What problems will arise in relation to fire prevention if the forest management changes?**

The Millewa group of forests have a good record in relation to bushfire.

Not only has the frequency of fires diminished, their intensity seems also to have lessened.

This must be at least partly attributable to the maintenance of fire-breaks within the forest and to the more recent banning of solid fuel fires but the contribution of planned stock grazing and the firewood removal permit system are also of major significance.

The commissioners have had an opportunity to inspect the result of the most recent intense fire

which resulted in the death of many trees. Without the aforementioned policies there is a strong possibility that this outbreak could have had far more serious consequences.

According to Victorian police estimates, there were tens of thousands of campers along the Victorian side of the Murray on Black Saturday 2009, downwind of the area in which the February 2008 fire started. It is likely there were thousands more on the NSW side.

Therefore any recommendations must include provision for ongoing fire hazard management.

Mega-fires are largely the result of poor planning as has been pointed out by expert witnesses to the Victorian Royal Commission and confirmed by Premier John Brumby's recent declaration of a clean-up day to remove potential fuel from the Victorian landscape.

River red gums are fire-sensitive, not fire-dependent. Since these forests are largely the result of white settlement it is incumbent on us to actively discourage the development of wildfires which have the potential to wipe the forests out.

### **Forests are solar-powered factories**

Environmentalists want us to replace fossil fuels with energy sources like solar power – a noble aim, and one I support. I have just read a *National Geographic* article on international efforts to harness the energy of the sun which, the article states, could provide all of mankind's energy requirements if only we can develop economical technology. Perhaps we are looking in the wrong places

Here on the Murray we already have one of the world's best solar-powered factories. It covers an area of about 35,000 hectares and for almost 150 years it has produced durable, carbon-neutral building materials, railway sleepers, landscape materials and fuel for home heating.

It doesn't emit harmful gases, it makes very little noise, costs practically nothing to run and operates with minimal human input. It removes carbon dioxide from the atmosphere and gives us in return the oxygen that keeps us all alive.

Yet the same environmentalists pushing the virtues of solar power want to lock it up and throw away the key.

Maybe that's because it is called a forest.

But trees make the most environmentally friendly structural materials in the world from just sunlight, carbon dioxide, water and a few soil nutrients.

*E. camaldulensis* also provides other smart uses for this captured solar energy. In Argentina plantations of the same trees provide charcoal for steel-making so the Argentinians do not need to import coking coal. In Nicaragua they are grown to fuel the boilers of the local sugar industry. In some parts of the world they are grown to provide exceptionally good domestic firewood.

There are serious flaws in the argument that logging is not necessary because alternatives are available. In the case of these particular forests the claim that the railway sleepers, which have been the main product for well over a century, are no longer needed because suitable substitutes exist are ill-founded.

Of the available alternatives, concrete sleepers are the most viable.

Yet the production of concrete involves such a large use of fossil-fuelled energy that this aspect alone must defeat the purpose of the substitution if we care about the environment.

The cement-making process begins with the mining of limestone, which is calcium carbonate. This is heated to high temperatures, *driving off the stored carbon in the form of carbon dioxide*. More energy is expended in crushing other mined rock for the concrete aggregate mix.

A rarely mentioned factor is that concrete sleepers cannot be randomly substituted for timber during line maintenance because more ballasting (yet another extractive process) is required to insulate them from vibration.

As a result all of the sleepers in a complete section of railway line must be replaced at the one time. There may sometimes be good reasons for using concrete sleepers but that is never a valid argument for halting the production of a renewable, environmentally-friendly, solar-powered resource if we are seriously concerned about reducing anthropogenic carbon dioxide in the atmosphere.

## **The IPCC supports good forestry**

In 2007 the International Panel on Climate Change, the part of the United Nations organisation leading the debate on human responsibility for climate change, stated in relation to reducing CO<sub>2</sub> emissions that:

*In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.*

Their reasoning restates the argument explored above - that photosynthesis, the process by which sunlight grows wood, is of enormous value to mankind and that sustainable forestry can procure the most environmentally-friendly products for a range of human needs.

Much has been made of a recent study from the Australian National University that found old growth forests store more carbon than do harvested ones. It may well be possible to demonstrate that this is so, but the argument becomes purely academic when a bushfire destroys the evidence, as happened to the forest in which the ANU research took place. Fire, not age, is the ultimate determinant of a standing forest's long-term ability to store carbon.

But sustainably harvesting a forest, removing some of the timber and making something lasting with it, is a far safer way of ensuring long-term sequestration of the carbon content.

Some scientists also believe that active management of mixed-age river red gum forests can give a better environmental outcome than an undisturbed old-growth forest.

## **What are the conservation issues and where is the evidence that forestry is a threat?**

Four animal species are usually nominated by environmentalists as needing the protection of a river red gum national park. They are the Superb Parrot, the Barking Owl, the Squirrel Glider and the Fishing Bat. None are listed by the NSW Department of Environment and Climate Change as endangered. In the case of all four there is a recommendation to retain and buffer hollow-bearing trees. Since such trees are already protected from logging in state forests for this very purpose there is no need for any new proclamation in this regard. Similar harvesting restrictions also apply to the Ramsar wetlands.

I am not aware of any study which establishes that forestry or timber harvesting pose a threat to any species. The hard lessons have been learnt and the knowledge is being applied.

Fragmenting the forests with national parks will ultimately make harvesting unviable, increasing our dependence on imported hardwood which has already reached scandalous proportions. We now spend over \$2 billion a year importing timber much of which, had we not already locked up so many of them, could be sustainably cut from our own hardwood forests.

National parks, for all their great worth, are an escalating drain on the public purse. Although some are well patronised, there is little evidence that the general public is interested in any but a handful on the western side of the Great Divide.

Four of the top five most-visited parks listed by the National Parks and Wildlife Service are in the Sydney region. The fifth, Kosciuszko, contains most of Australia's principal ski resorts.

There is also growing concern that many of them harbour feral pests and are a considerable fire risk. River red gums do not need the protection of a national park. The trees are certainly in no danger of extinction and I know of no evidence that logging presents a threat to the numerous species that use these forests as habitat.

There are in fact at least two national parks in the state of which these trees are a major feature.

The latest one, Yanga, was purchased at great cost to the taxpayers specifically to conserve 17,000 hectares of privately-owned *E. camalulensis* forest which had been logged for many years, yet was

still presented to the public by the then premier, Bob Carr, as a fine example of a riverine red gum forest.

Please consider in your deliberations whether it is wise and just to inflict on future generations the ongoing cost of maintaining the existing parks before recommending any more.

### **What's to be done about protestors?**

Anyone is entitled to voice an opinion but that should be as far as rights and freedoms go. I know from friends in the timber industry that one of their great frustrations is the ongoing campaign by environmental groups using the threat of protest action to halt logging. There are mechanisms in place for dealing with alleged breaches of forestry regulations. However there are elements within the environmental movement who choose to defy existing legislation to force honest, law-abiding people to stop work. We had a recent example of the philosophy of such groups when a spokesman reportedly said: "Our fight is with state forests," while preventing a contractor from going about his lawful business with a stupid stunt that could have ended in tragedy. There needs to be more robust protection for the industry to ensure police action is both swift and effective in dealing with what amounts to hijacking of the democratic process and a serious breach of workers' rights.

### **Why tourists are no substitute for the timber industry**

As the report notes, there is considerable local doubt about Bob Carr's prediction of 50,000 tourists a year for Yanga National Park. The then Minister for the Environment and Climate Change, Carmel Tebbutt, was much more conservative when she officially opened the park, suggesting that it may take some time for the tourists to discover the Balranald area.

The oft-touted potential for tourism to soften the blow should the timber industry be shut down does not stand up to close scrutiny.

A report commissioned last year by the Wilderness Society and the National Parks Association, *Seeing the Money for the Trees*, received much press when it was released - including speculation on the dollars that would flow from increased tourism.

The agency responsible for the report, Economists at Large, say they based their prediction of a potential \$101 million windfall for this region on extrapolations from a PricewaterhouseCoopers study of the Victorian Grampians National Park. Curiously they also included ten year old figures from Coolah National Park in central NSW to support their case.

These two national parks, the report claims, were selected as models on the sole basis of their geographic status - both are inland and well away from the capital cities of their respective states.

Coolah was an unfortunate choice.

Although the study's figures show that in its first year as a national park it received twice as many visitors as the estimated public visitation in its state forest days, it has so far steadfastly refused to deliver the 30,000 annual tourists predicted 14 years ago by Mr Carr.

His forecast I suspect was based on economic modelling which extrapolated figures from the nearby Warrumbungles National Park, and incorrectly assumed that many of those same tourists would automatically include Coolah in their itineraries.

The Warrumbungles, a group of eroded, extinct volcanoes contain spectacular landforms visually comparable to the Victorian Grampians. When my children were young it was one of our favourite camping destinations.

Coolah is a formerly-logged forest just like those of the Riverina.

Apparently its major drawcard these days is a annual jazz festival. Coolah township, which had been economically supported by its now-closed sawmill, is struggling and Coolah Shire has amalgamated with Coonabarabran to form Warrumbungles Shire. The people of Coolah have thus been disenfranchised to provide the state with an apparently unpopular national park.

By the time he purchased Yanga, Mr Carr's crystal ball had grown more excited. His forecast seems also to have been drawn from the Warrumbungles figure, using Lake Mungo as a multiplier.

*The application of such selective extrapolation, far from being scientific prediction, borders on fraud.*

The reliability of these forecasts should be investigated thoroughly.

Significantly the Victorian study undertaken by PWC, widely touted in the media as “proof” that national parks provide economic benefits to their regions, looked at only three national parks, Grampians, Port Campbell and Wilson's Promontory. All three had gone against the trend for regional parks in the four years prior to the study in that there had been steady annual increases in visitation (except that in the case of Wilson's Promontory, visits dropped in 2000-2001 perhaps due to a large fire during 1999). Only one other regional Victorian national park, Croajingalong – in the remote south east – showed a comparable rising trend in figures found on Parks Victoria's website. ( [http://www.parkweb.vic.gov.au/resources/14\\_1448.pdf](http://www.parkweb.vic.gov.au/resources/14_1448.pdf) ) accessed October 9 2009.

But Croajingalong is too far from major centres to have been shown to give them an appreciable economic gain. It is noteworthy that Parks Victoria seems to have stopped publishing actual visitor numbers in 2001 and now relies on surveys.

The *Seeing the Money* report also quoted visitor expenditure in the combined tourism regions of Riverina and Murray. They said they did this because red gum sawmills are located in both regions. I am aware of only one large sawmill in the Riverina Tourism region, at Darlington Point - which is right on Riverina's southern boundary. Note that the NSW Tourism region called Riverina is north of the traditional geographic boundary of the Riverina region - which lies within Murray.

However the two regions added together also conveniently produced an impressively large sum of money spent by their visitors. But these included many who were just visiting friends or making other contacts – more than half in fact. It seems curious they would do this when the amount spent by people who actually called themselves tourists in the survey (about 48% of all visitors in Murray, somewhat less in Riverina) were available from the same source.

I note that the commissioners' report adds in also the Outback tourism region to arrive at a gross income figure of more than \$1 billion – from *all visitors*, not just tourists. I have difficulty believing any bank would lend money on such calculations.

The percentage of overnight tourists to the Murray region of NSW Tourism (in which nearly all of the mid-Murray forests are included) who indulge in “nature based” experiences is claimed to be around ten per cent. This seems to be a common average in these surveys.

Tourism Research Australia who conduct the surveys that produced these figures say that “nature based” means “a visit to a national or state park; a visit to a wildlife park, zoo or aquarium; a visit to a botanical or other public garden; a bushwalk or rainforest walk; whale or dolphin watching in the ocean; snorkelling or scuba diving”. Since opportunities for most of these activities in the Murray tourism region are extremely limited, I am left wondering where these tourists go – and worrying about the reliability of such surveys.

Tourists who do come to this region are known to include those indulging in water skiing and recreational fishing. They are an important economic component of the tourism industry around Mathoura, Moama, Deniliquin and Barham.

Many of them are bush campers who enjoy the freedom of staying in a state forest. The big question is whether these people would continue to patronise an area subject to the usual entrance fees and restrictions of a national park. And even if they did, from where would we recruit enough extra tourists to help maintain the region's economy should the timber industry be dismantled?

Tourists, unlike the forests, are a finite resource. The reservation of these forests is unlikely to magically create more tourists, so any tourism growth in this area will surely be at the expense of another region. You do not create wealth by simply transferring money from one pocket to another.

### **CAR reserves**

These floodplain forests are interlaced with regulated permanent streams and what might be termed

ephemeral watercourses (locally called “runners”, probably from “runnel”). Each has a 20 metre exclusion zone on either bank (in the case of the Murray river only the north bank) as well as the stream bed, which are reserved from logging. The total area of these reserves should be calculated as part of the Comprehensive, Adequate and Representative reserves requirement.

A handwritten signature in black ink, appearing to read "David Joss". The signature is fluid and cursive, with a large loop at the end of the last name.

David Joss  
October 10 2009