

LOGGING IN STATE FORESTS

SUPPLYING WATER TO MELBOURNE:

stage 1 – method for assessment

a submission made to URS Pty Ltd
acting on behalf of the Department of Sustainability & Environment

by LAWYERS FOR FORESTS INC



29 October 2007

CONTENTS

Section	Description	Page
1	Introduction	3
2	About the Wood and Water project	4
3	Section 1: Framework – Timber Substitution Studies	4
4	Section 1: Framework – Water Quality Review	4
5	Section 2: Background and issues – economic and social	6
6	Section 4: Sustainability assessment methodology	6
7	Integrity of the Wood and Water project	6
8	Conclusion	7

1. Introduction

- (a) Lawyers for Forests congratulates the Victorian government on conducting a study (“the Wood and Water project”) into, among other things, the phasing out of logging in State forests that supply water to Melbourne.
- (b) The Thomson Reservoir is situated along the eastern escarpments of Mount Baw Baw and carries approximately 60 percent of Melbourne’s water storage capacity. It is surrounded by 48,700 hectares of forested catchment that include the northern and eastern slopes of Mount Baw Baw, the southern slopes of Mount Matlock on the Great Dividing Range and the western slopes of the Aberfeldy Range. The Thomson is the largest of four major water supply catchments for Melbourne, with the others being Maroondah, Upper Yarra and O’Shannassy. All are located within the Central Highlands of Victoria. The Thomson is a major water supply catchment upon which logging is permitted. The forest industry considers the Mountain Ash, Alpine Ash and Shining Gum forests within the catchment as highly valuable for timber and pulp and targets these for logging. These forests cover 33.5 percent of the Thomson Catchment and occur within the high rainfall areas, mostly along the escarpments of Mount Baw Baw. When regenerating after logging, these species have been observed to double their use of water. The Strategy Directions Report stated that if logging were to be phased out of the Thomson Catchment by 2020, it is estimated that it will provide an additional volume of water in the order of 20,000ML.¹
- (c) For the benefit of Melbourne’s water supply, logging in State forests that supply water to Melbourne must stop immediately.
- (d) In this submission to stage 1 of the Wood and Water project, Lawyers for Forests has not completed the form provided by URS titled “consultation questions on draft methods report” for various reasons, including that it presupposes the kinds of things that Lawyers for Forests would want to make submissions about. Additionally, Lawyers for Forests is of the view that the form complicates the information sought, has the effect of overwhelming stakeholders and consuming more of their time than necessary. In this document, Lawyers for Forests sets out some of the matters that are of concern to it in respect of stage 1 of the Wood and Water project.

¹ All of the information in this paragraph is extracted from chapter 10.1 (which cites further sources) of the following report: The Central Highlands Alliance, The Baw Baw Report, www.tcha.org.au, click on Baw Baw and then click on Baw Baw Report from the body of the page.

2. "About" the Wood and Water project

- (a) The website for the Wood and Water project (at <http://www.dse.vic.gov.au/DSE/wcmn202.nsf/LinkView/5DOF6D3F9BDB9442CA257356002257C4338C9F6211421BBDCA256FDD00136E12>) ("the website") includes as a heading "About the project". Under this heading, it says that the Victorian Government's White Paper, Securing Our Water Future Together ("the White Paper"), identified Action 2.21 that will, among other things "develop options aimed at improving the water yield, including potential changes to management practices and phasing out logging in these areas" (our emphasis).
- (b) The website contains a link to a document titled "discussion paper". In the discussion paper there is a heading "executive summary". Under that heading it says that "key actions relating to identifying impacts of land use change include... developing options aimed at improving water yield". This sentence stops short of "including... phasing out logging in these areas". Lawyers for Forests expects that this omission was inadvertent and that the Wood and Water project will develop options aimed at phasing out logging in water supply areas, as set out in the White Paper and on the website. Please let us know immediately if this is not the case. If it is not the case, Lawyers for Forests is of the view that the Wood and Water project will be pointless and Lawyers for Forests will not allocate resources to being involved in it.

3. Section 1: Framework – Timber Substitution Studies

- (a) We refer to section 1 of the URS document titled "draft method for conducting a sustainability assessment of future management options for state forests supplying water to Melbourne" ("the draft method document"), which addresses the "framework for sustainability assessment" and which is on the website.
- (b) Figure 1.1 of the draft method document includes in the diagram reference to a report called "Timber Substitution Studies" ("TSS"). Figure 1.1 indicates that the TSS will contribute to the long term plan for management of State forests supplying water to Melbourne. The website includes a link to the TSS.
- (c) The TSS was written in May 2006 by MBAC Consulting Group. Lawyers for Forests understands that the MBAC Consulting Group is associated with the native forest timber industry. The document itself makes this evident in various ways, including that the TSS has not considered any substitution of our native forest resource with resources from plantations. Additionally, the TSS simply states what the sustainable yield is and that it must be achieved and maintained. As a result, the independence and integrity of the TSS comes into question. Lawyers for Forests is of the view that an independent report must be obtained, otherwise the Wood and Water project cannot be seen to be credible

or reliable. If an independent report is not obtained the Wood and Water project will be useless.

4. Section 1: Framework – Water Quality Review

- (a) The website includes a link to a document titled “interim update”. The interim update says, among other things, that:

“The Water quality review examined the water quality issues associated with timber harvesting through reviewing relevant literature and environmental audits of timber harvesting in Melbourne’s catchments. It focused on the impacts on ‘in-stream’ water quality and found that, while the main impacts from timber harvesting relate to sediments and nutrients from unsealed forest roads, best management practices employed in the catchments are effective at minimising sediment and nutrient inputs to waterways. These measures, as well as a number of other catchment protection measures, continue to ensure that Melbourne’s water is of the highest quality and requires little treatment.” (our emphasis)

- (b) Figure 1.1 of the draft method document includes in the diagram reference to a report called “Water Quality Review” (“WQR”) which, as with the TSS, indicates that the WQR will contribute to the long term plan for management of State forests supplying water to Melbourne. The website includes a link to the WQR.

- (c) Page 8 of the WQR says, among other things, that:

“Timber harvesting is one of the activities that can impact on the quality of instream water entering reservoirs and this review specifically considers the potential impacts of timber harvesting on instream water quality only. It is beyond the scope of this review to consider the impacts of reservoir dynamics on water quality and hence the ultimate quality of water that enters treatment plants and the potable water supply system.” (our emphasis)

- (d) Additionally, part 3.4 of the WQR (headed specific impacts on Melbourne’s water supply) provides that:

“To our knowledge, no studies have been undertaken to determine the specific relationship between timber harvesting and potable water quality with Melbourne’s water supply systems,”

and part 4 (headed “conclusions”) similarly provides that:

"No studies have been undertaken to determine the specific relationship between timber harvesting and potable water quality within Melbourne's water supply system." (our emphasis)

(e) As a result of the matters referred to at paragraphs 4(b) to (d) above, the statement in the interim report referred to at paragraph 4(a) above, is wrong and without foundation. The water quality review includes no relevant scientific evidence of the effect that logging in water catchments has on water quality. Lawyers for Forests is of the view that such information must be obtained and considered so that the Wood and Water project can be credible and reliable and so that it can produce the right outcome for the benefit of Melbourne's water supply. If such information is not obtained, the Wood and Water project will be useless.

5. Section 2: Background and issues – economic and social

Page 2-4 of the draft methods document includes "box 2-1". In that box is the heading "economic and social". The dot points thereunder set out various statistics. For example, the first dot point states that "the catchments currently supply around 200,000m³ of logs per year of which around 70,000 is saw logs and the remainder residual logs/pulp wood" and the second dot point states that "it is estimated that the wood harvested from the catchment directly generates employment for around 1,100 people". The figures set out in this section are not consistent with other figures that have been published.² None of the figures have been sourced. Lawyers for Forests is of the view that the source of these figures should be revealed and the figures should be verified.

6. Section 4: Sustainability assessment methodology

(a) Page 4-8 includes a table (Table 4-1) titled "list of impacts". Considerably more impacts should be listed, including the social and economic loss to the plantation industry since continued logging in water catchments will, among other things, restrict the growth of the plantation industry and all of the social and economic benefits that may derive from the plantation industry.

(b) Page 4-15 refers to two approaches that are proposed to incorporate society's values. Lawyers for Forests is of the view that, no matter what approach is taken, a complete cross-section of the community should be involved.

7. Integrity of the Wood and Water projects

(a) In this document reference has been made to matters that might question the credibility and reliability of the Wood and Water project. Lawyers for Forest is generally

² For example, Victorian Forest Alliance, Choosing a Future for Victoria's Forests, June 2006, page 20.

concerned about the integrity and transparency of the Wood and Water project, including its outcomes, as a result of prior government conduct in similar matters.

- (b) For example, in late 1993, the then Department of Conservation and Natural Resources (“DCNR”) completed a study and produced a report.³ The report was commissioned as the result of public concern over the potential impact of, among other things, logging on environmental values in the forests of the Central Highlands of Victoria. The report initially comprised of 11 chapters. However, upon the publishing of the report in 1994, Chapters 8, 9 and 10 were removed. Chapter 11 became Chapter 8; however, the biologists’ recommendations for the management of Biologically Significant Sites and wildlife corridors were removed from that chapter. The missing chapters surfaced through recent inquiries made by individuals and by environment groups. The removal of this information prevented forest management from being properly informed about the significance of the region.⁴ Since then, the Upper Tyers River Catchment has been subject to extensive clearfell logging. The Chair of the Senate hearing on the Regional Forest Agreement Bill described the act of suppressing this information as a fairly serious charge.⁵ It revealed that forest management acted in the interest of meeting ‘unsustainable’ timber and pulp license commitments at the expense of forest biodiversity and the public good.
- (c) The future management of Melbourne’s water supply is crucial and its conservation is of utmost importance. Lawyers for Forests seeks your assurance that all aspects of the Wood and Water project will be candid and transparent, and that all outcomes will be published and on the public record.

8. Conclusion

- (a) Lawyers for Forests looks forward to your written confirmation that:
- (i) the Wood and Water project will develop options aimed at phasing out logging in water supply areas, as set out in the White Paper and on the website;
 - (ii) a timber substitution study will be undertaken by an independent organisation that will consider, among other things, the plantation industry;
 - (iii) an independent study will be undertaken to determine the specific relationship between timber harvesting and potable water quality within Melbourne’s water supply system;
 - (iv) the source of the figures referred to at paragraph 5 above will be revealed and independently verified;

³ J. B. Davies, R. L. Carter, M. B. Drummond, G. J. Hollis, C. G. Pascoe, R. P. Wallis and K. P. Lester, Ecological Survey Report No.46 - Flora and Fauna of the Eastern and Western Tyers Forest Blocks and Adjacent South-Eastern Slopes of Baw Baw National Park, Central Gippsland, Victoria, 1993.

⁴ Official Committee Hansard, Senate, Rural and Regional Affairs and Transport Legislation Committee, 1 February 1999.

⁵ *Ibid*

- (v) the social and economic impact on the plantation industry will be considered;
- (vi) a complete cross-section of the community will be involved; and
- (vii) all aspects of the Wood and Water project will be candid and transparent, and that all outcomes will be published and on the public record.

(b) This will indicate, at this stage, that the Wood and Water project will be constructive and effective. It will assist Lawyers for Forests in having confidence in the Wood and Water project so that it can continue its involvement in the project.

Prepared by Vanessa Bleyer and Nick Drew
on behalf of Lawyers for Forests Inc

29 October 2007