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National Biodiversity Response
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**SUBMISSION TO AUSTRALIA'S BIODIVERSITY CONSERVATION
STRATEGY 2010-2020 CONSULTATION DRAFT (DRAFT STRATEGY)**

Australian Forest Growers (AFG) is the national association representing around 1200 small private forest growers from 22 regional branches across Australia's forest growing regions. AFG's members include farm plantation growers, private native forest managers and private commercial plantation companies. Since 1969, AFG has been advocating responsible establishment and management of forests on private land, which provide the multiple outcomes that the community increasingly demands. The growing of commercial plantations and active management of private native forests by our members has been delivering improved landscape health outcomes for decades, as well as complementing existing productive agricultural land use practises.

AFG recognises the important role that the maintenance of biodiversity plays in the health of the Australian environment. The re-establishment of trees in the farming landscape has huge potential for contributing to the amelioration of many of the natural resource management (NRM) issues that affect our rural landscape. Commercial tree planting as a conservation tool is important to achieve environmental remediation at a landscape level. Forestry, and the planting of trees can be used to mitigate some of the main threats to biodiversity, including climate change (trees sequester carbon); invasive species (trees can provide competition to weeds); fragmentation and degradation of habitat (plantings of trees can provide wildlife corridors for native animals); and trees can help in rehabilitating degraded landscapes.

Forestry policy in Australia has traditionally been concerned with wood supply, that emphasis is now balanced with environmental management and community development objectives. The *National Forest Policy Statement* (1992) promotes a holistic management of forests with the core framework being based around ecologically sustainable forest management (ESFM). Ecologically sustainable forest management is *the integration of commercial and non-commercial values of forests so that both material and non-material welfare of society is improved, whilst ensuring that the values of forests, both as a resource for commercial use and for conservation, are not lost or degraded for current and future generations* (from the *National Forest Policy Statement* based on a definition provided by the Forestry Working Group on Ecologically Sustainable Development, 1991).

AFG has a mature and comprehensive policy statement booklet which is developed and reviewed biennially by its members. The policy statement booklet is a product of

the biennial Policy Forum where members are directly involved in the policy development process and encouraged to propose policies on any issue. The 3rd Edition of the AFG Policy Statement booklet was released following the AFG Policy Forum in October 2007. This year, current policies will again be reviewed and updated, such as AFGs policy on Climate Change so that it includes the CPRS. The policies included in this submission have been voted on and agreed by our members and as such will not be updated until the Policy Forum later this year.

This submission relies on AFG's policies, where they intersect with the myriad of issues raised in *Australia's Biodiversity Conservation Strategy 2010-2020 Consultation draft*.

Forestry, Natural Resource Management and Biodiversity

AFG promotes the establishment of trees in the landscape for a range of beneficial outcomes. *Australia's Biodiversity Conservation Strategy 2010-2020 Consultation draft* advocates that degradation of habitat and unsustainable use of natural resources are both threats to Australia's biodiversity. The establishment of trees can help mitigate these threats. The Australian, State and Territory Governments, along with major conservation groups, have recognised that trees have the capacity to simultaneously address multiple natural resource management (NRM) issues, while providing a commercial return on investment. Farm and plantation forestry, and managed native forests are therefore widely promoted as cost-effective approaches to meeting a wide range of triple bottom line objectives.

To achieve revegetation on the scale required to address Australia's land degradation issues, commercial forestry must be part of the solution. The currently small area of exclusively environmental plantings in the agricultural landscape, make a negligible contribution to catchment scale NRM objectives. Developing new integrated farm forestry initiatives amongst the farming community is imperative. However, this holistic land use perspective is not extensively disseminated and misplaced community concern regarding the timber industry still suggests that forestry is not yet widely accepted as a viable alternative to other land uses.

Aligning NRM programs with forest and timber industry development could provide cost effective solutions to land degradation and associated environmental problems. For example, appropriately located tree plantings of sufficient scale would enhance biodiversity outcomes and improve water quality, and also provide an opportunity for regional enterprise development.

An example of such an outcome is addressed in AFG's quarterly magazine, the *Australian Forest Grower*. In the summer 2009 edition (Vol 31, No 4) there was an article by Philippa Noble entitled *Creating forests of solid, stored solar energy*. The biodiversity benefits of firewood plantations were mentioned in the article: *"The potential of firewood plantations to contribute to biodiversity conservation, particularly in the woodland areas, was proven in a RIRDC study by ecologist Richard Loyn and his colleagues from the Arthur Rylah Institute for Environmental Research. They found that plantations of all sorts can provide habitat for native birds and mammal species associated with forests, woodlands and open country. As many of the tree species native to the medium to low rainfall zones have excellent firewood*

characteristics and coppice well, this further increases the biodiversity value of firewood plantations established using indigenous species”.

Australia’s Biodiversity Conservation Strategy 2010-2020 Consultation draft nominates that the actions required to implement Australia’s Biodiversity Conservation Strategy are to ‘*restore ecological function to critically degraded landscapes through sustainable practices that manage our soil and water resources*’ and ‘*increase the cover of native vegetation wherever feasible to enhance ecological connectivity across fragmented landscapes over time*’. AFGs members have been achieving these outcomes for over forty years through establishing trees in the farming landscape. Plantation forestry and private native forestry are positive land uses and promote biodiversity and sustainable land management whilst also providing a commercial return.

Indigenous Forestry – Involving Indigenous peoples

AFG supports the involvement of indigenous peoples and has developed policy on this issue (Attachment B). AFG acknowledges the unique connection that indigenous people, the original custodians of the land, have with forests is widely acknowledged and so is the urgent need for economic development in indigenous communities. Around 13% of Australia’s forests are on Aboriginal owned land; however few Aboriginal communities are directly involved in management and commercial utilisation of these forests. Forestry could play a much greater role in creating socio-economic benefits and providing opportunity to indigenous people in Australia. AFG recognises that there is a wealth of knowledge and skills already available in some indigenous communities where forests and woodlands are managed sustainably by indigenous people. AFG has members around Australia with expertise in sustainable utilisation of forests that are well placed to assist in making the connections, to help collaborative indigenous forestry initiatives grow.

Fire Management and Biodiversity

The nomination of fire regimes (including fuel reduction burning) as a key threatening process to Australian biodiversity, mentioned in *Australia’s Biodiversity Conservation Strategy 2010-2020 Consultation draft* is of concern to AFG. The concept that planned use of mild intensity fire is a threat to biodiversity is a significant reason for the decline in the level of fuel management and fire preparedness in Australia.

Bushfires are a natural part of the Australian environment, and a major theme in Australian history. Aboriginal people use fire as a legitimate land management technique, and have done so, for thousands of years. Fire management in Australia has been characterised in the past decade or more by disputes regarding the impacts of prescribed burning on ecosystems, including whether burning equates to vegetation clearance (as it does under South Australian native vegetation laws). This dispute has resulted in an increasingly cautious approach towards active fire management, particularly on the part of the government agencies responsible for management of the public protected area estate. The consequence of a lack of prescribed burning is a build-up of fuel loads to levels which make it virtually impossible to manage a fire, even under relatively mild conditions.

AFG seeks that the Department of the Environment, Water, Heritage and the Arts recognise that if fuel reduction burning does not occur, intense fires do, and this is a

far worse situation in terms of threat to biodiversity and ecosystems, not to mention human life and social and economic infrastructure. The precautionary approach to biodiversity conservation, in the case of fire and fuel reduction burning, should be reconsidered. As Roger Underwood states, a forester with fifty years experience in bushfire management and bushfire science, in his paper *Australian Bushfire Management: a case study in wisdom versus folly*, ‘In the Australian bush if you do not manage fire, you cannot manage for anything else’.

The town of Cooktown in Far North Queensland is an example of the changes that have occurred in fire management regimes and the resultant associated risks. Grassy Hill is a tourist stop outside of Cooktown, so named by Captain Cook in around 1770 when he was stranded at Cooktown for a few weeks while repairing his ship. In order to work out a route out through the reefs, he climbed the steep hill overlooking the area. He named the rise “Grassy Hill” because that’s what it was – a hill covered in grasses. It was grassy because of a very long term regime of burning by our native inhabitants. If you look at Grassy Hill today, you find it covered in thick native vegetation and it poses a real fire hazard risk to Cooktown. This risk is because fuel reduction burning is now limited in Far North Queensland.

Chemical Use, Plantation Forestry and Biodiversity

Australia’s Biodiversity Conservation Strategy 2010-2020 Consultation draft nominates that unsustainable use of natural resources and changes to the aquatic environment are key threats to Australia’s biodiversity. AFG recognises that plantation forestry receives close scrutiny regarding the use of chemical pesticides, perhaps significantly more so than other land uses such as broad-acre agriculture. Some environmental groups have raised concerns about plantation forestry practices and the toxicity and residual nature of some chemicals. Concerns generally relate to the risk of off-target damage, such as water pollution and native animal poisoning. AFG does not accept that chemical use in plantations carries any greater risk than in agriculture generally; nevertheless, AFG advocates the careful and vigilant use of chemicals.

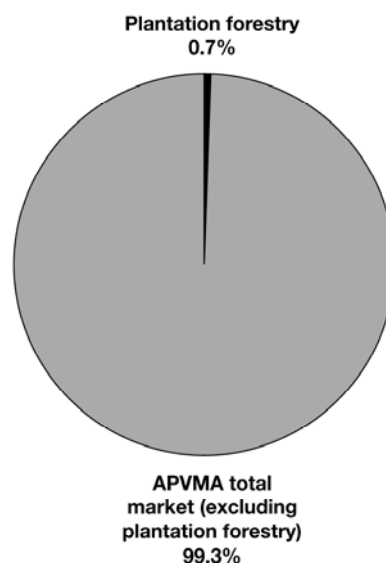


Figure 1: Plantation forestry uses around 0.7% of the total agricultural and veterinary chemical spend in Australia, with all but one chemical used by plantation forestry used in food production. *Source: ‘The search for a social licence to operate’ by Braden Jenkin. Australian Forest Grower. Summer 2009. Vol. 31 No. 4*

There are regular and significant enhancements in the way in which chemicals are used for commercial forest establishment in Australia. Chemicals are increasingly becoming safer for both the user and the environment. For example, granular herbicides are becoming more regularly used in plantation establishment to replace the easily soluble and sometimes volatile, liquid herbicides. Chemical applications for establishing plantation forests are also increasingly being applied on more site specific situations, including, where possible and appropriate, such technologies as spot and band spraying rather than aerial spraying, where possible and appropriate, to reduce the volume of chemical applied.

AFG advocates the sensible and informed use of chemicals in the plantation industry, but also supports options to reduce the use of chemicals that are scientifically proven to be harmful to the environment. Chemical use is just one tool in integrated pest, disease and weed management, yet it plays a pivotal role in maintaining plantation health and productive capacity. Plantation growers need all these tools at their disposal for 'best practice' techniques in successful tree establishment. Precautions such as retaining buffer strips around waterways and not applying chemicals to waterlogged soils or just prior to heavy rainfall events are all strategies endorsed by AFG. AFG also strongly supports ongoing research and development into chemicals used in plantations, so as to provide the most accurate and appropriate advice to our members.

Forestry and Climate Change

Australia's native forest estate has evolved under varying climatic conditions, from cold alpine heath, to the tropical rainforest in the north and the vast dry woodlands. Each of these forest types stand to be impacted in some way by global warming. Possibly the greatest destruction period for our precious biodiversity is still yet to come. This is compounded by the economic and social devastation that threatens us in the forthcoming decades as global warming intensifies.

Commercial forestry in Australia is a major CO₂ sink, in addition harvested wood products hold carbon stores for the life of the product and beyond disposal. Although there are still many uncertainties regarding the science of climate change, it is widely understood that wood production through commercial forestry should be significantly expanded to act as a sink for CO₂, thus having a positive role in the race towards slowing global warming. The scientific literature demonstrates that actively growing forests have a significant role to play in climate change mitigation.

AFG advocates that *Australia's Biodiversity Conservation Strategy 2010-2020* recognise that the forest industry has a pivotal role in mitigating climate change through carbon sequestration. Any action plan developed should promote this industry.

Access to Genetic Diversity

The aim of genetic conservation is to secure the adaptability of populations and species in a changing environment by maintaining a comprehensive and representative level of genetic variability. As described in the Wet Tropics Management Authority's policy statement, *Commercial Use of Forest Products in the Wet Tropics World Heritage Area*, commercial forest use for seed collection or

cuttings for propagation should be allowed if practices are considered minor and inconsequential. AFG supports the principles of genetic conservation as an integral part of commercial forest use and, as protected forests provide a genetic resource that could benefit the plantation forestry industry, access to genetic diversity within national parks is desirable.

The issue regarding access to genetic diversity within conservation reserves arises in response to the recent acquisition of lands for the expansion of national parks. AFG considers that perverse environmental outcomes could occur in instances where a forest grower cannot access local genetics from a neighbouring national park resource (through industry seed collections), and instead utilises genetic plant material from another region. This could have the negative impact of localised genetic pollution.

If gene flow between populations is restricted, then populations are units of evolution and in some cases may contain unique physiological characteristics such as desirable wood properties. It is these potential physiological differences within species with notable timber qualities that have special interest to the plantation forestry industry. Also, restricted populations of species not yet known to the plantation industry may occur in reserves such as World Heritage Areas that could provide new plantation development opportunities, thus enhancing the diversity of timber available to the market and to end users.

Many scientists acknowledge that conserving biological diversity must go beyond the traditional boundaries of reserving large expanses of native vegetation. The plantation forestry industry has the potential to be an important contributor to maintaining species and within-species populations of genetic diversity, as well as contributing to gross domestic product. *Ex situ* facilities such as plantations provide insurance against inadvertent or unavoidable extinctions, especially as wildfire is an ongoing threat in reserved estates, which feature unmanaged fuel loads. To obtain these conservation outcomes though, restricted access to genetic diversity within reserves such as World Heritage Areas must be reviewed so that industries such as plantation forestry, nurseries and conservation planters can also benefit.

Promoting biodiversity through a commercial market

AFG provided a submission to the *Independent Review of the Environment Protection and Biodiversity Conservation Act 1999* and advocated the implementation of a market framework for biodiversity credits to be established as a tool in promoting and conserving Australia's biodiversity. The creation of a market for biodiversity credits would view the biodiversity value of a plantation as tradable and this would lead to greater investment in plantations. This outcome would be a very positive one from the perspective of AFG members.

A functioning biodiversity services market would need to include agreed and pragmatic mechanisms for measuring the biodiversity values on a property and forest owners would need to keep records that show the development of certain biodiversity values in addition to business as usual. For example, a person who alters a harvest regime so that strips are harvested and wildlife corridors are always in place would potentially achieve the same outcome for wildlife conservation that regulations are aimed at. This would be allocated biodiversity credits.

Current Australian policy and biodiversity

It is of concern to AFG that the approach adopted for biodiversity conservation that is embodied in legislation in both state and national jurisdictions has previously (and continues to be) outdated and AFG advocates that the action plans in *Australia's Biodiversity Conservation Strategy 2010-2020 Consultation draft* not adopt this same approach. The main method adopted by state and national jurisdictions is still to separate areas as 'no-go zones' and designate areas where forestry is permitted. What happens when management of reserves is badly financed? And what happens to biodiversity outside of reserves? The contribution that responsible, sustainable, active management of forests for biodiversity, water, fire protection and other values are all overlooked and in some cases specifically precluded by this approach.

In some contexts, reservation is appropriate, but forest growers are the first to recognise and implement this. Common examples are the revegetation of riparian zones alongside creeks and rivers, and the maintenance of remnant native vegetation that provides endemic seed stock for forestry establishment on other parts of a property. Forest growers are often frustrated that their efforts to enhance the biodiversity values of their land – e.g. through plantation design, species selection and implementation of other research in this field – are not met with incentives or recognition. The result is an under-celebrated sector of the industry that is motivated by good will, the possibility of a financial return in a few decades' time, and the occasional Landcare grant.

Conclusion

The establishment of trees in the landscape can provide increased landscape health outcomes and promote biodiversity. Native tree species can be planted in a farming landscape for conservation (and commercial return) and to create habitat connectivity for local faunal species. AFGs members, through planting trees in the Australian landscape, are actively contributing to the conservation of Australia's biodiversity through adopting practices which mitigate some of the main threats to biodiversity as outlined in *Australia's Biodiversity Conservation Strategy 2010-2020 Consultation draft*.

Thank you for the opportunity to provide a submission. Please do not hesitate to contact the undersigned on (02) 6162 9000 should you wish to discuss any of the issues raised.

Yours sincerely,



Warwick Ragg
Chief Executive

**ATTACHMENT A - AFG POLICY STATEMENT No. 1
FORESTRY IS A LEGITIMATE LAND USE**

**ATTACHMENT B - AFG POLICY STATEMENT No. 6
INDIGENOUS FORESTRY**

**ATTACHMENT C - AFG POLICY STATEMENT No. 10
CLIMATE CHANGE**

**ATTACHMENT D - AFG POLICY STATEMENT No. 17
CHEMICAL USE AND PLANTATION FORESTRY**

ATTACHMENT A – AFG POLICY STATEMENT No. 1

FORESTRY IS A LEGITIMATE LAND USE

Australian Forest Growers seeks:

- *the recognition of appropriate placement of trees in the landscape as providing multiple benefits, including environmental solutions addressing salinity, declining water quality and biodiversity, and to ensure that costs and benefits are attributed appropriately;*
- *to pursue the need for ecologically sustainable forest management to be accepted as a legitimate agricultural land use; and*
- *to promote an enhanced relationship between forestry and other forms of agriculture.*

Background

Forestry policy in Australia has traditionally been concerned with wood supply, but that emphasis is now balanced with environmental management and community development objectives. Shifts in government environmental policy in the late 1970s ultimately gave rise to the *National Forest Policy Statement* (1992), which envisaged significant changes in management of native forests, together with renewed emphasis on plantation and farm forestry development. The core framework driving this policy shift was ecologically sustainable forest management (ESFM) – the management of forests for all their values. This was derived from international agreements signed by Australia following the United Nations Conference on Environment and Development held in Rio de Janeiro in 1992. Additionally policy impetus was given to plantation growth by the development of *Plantations for Australia: The 2020 Vision* (1997), with renewed support for a revised version of that policy statement given by all levels of government in 2002.

The Australian, State and Territory Governments, along with major conservation groups, have recognised that trees have the capacity to simultaneously address multiple natural resource management (NRM) issues, while providing a commercial return on investment. Farm and plantation forestry are therefore widely promoted as cost-effective approaches to meeting a wide range of triple bottom line objectives.

Farm forestry enhances other forms of agriculture – it enhances land use sustainability, reduces soil loss, offsets greenhouse gas emissions, provides livestock shelter and reduces lambing losses. There is a need to increase mutual understanding of production needs of agriculture and forestry, as complementary rather than competing industries.

In spite of scientific recognition of the positive role forestry can play in meeting multiple objectives, farm and plantation forestry and private native forest management continue to draw community concern in some regions. Much of this community concern arises from anti-development groups and disquieted individuals.

Discussion

To achieve revegetation on the scale required to address Australia's land degradation issues, commercial forestry must be part of the solution. The currently small area of

exclusively environmental plantings in the agricultural landscape, make a negligible contribution to catchment scale NRM objectives. Developing new farm forestry initiatives amongst the farming community is imperative. However, this holistic land use perspective is not extensively disseminated and community concern regarding the timber industry still suggests that forestry is not yet widely accepted as a viable alternative to other land uses.

Community resistance to forestry needs to be addressed by the industry in a given region, demonstrating that forestry activities do contribute to the 'triple bottom line'. At the same time, forestry must not be

ATTACHMENT B – AFG POLICY STATEMENT No. 6

INDIGENOUS FORESTRY

Australian Forest Growers:

1. *advocates promoting skill development and work place opportunities for indigenous peoples in the existing forestry industry and for enhanced management of private forests on existing indigenous tenure;*
2. *advocates development of suitable Aboriginal lands for forestry activities, including joint venture plantation establishment; and*
3. *supports as a signatory, the national indigenous forestry memorandum of understanding predominantly in the areas of:*
 - i. *private native forestry;*
 - ii. *joint venture plantation development;*
 - iii. *skills learning and sharing in all aspects of forest management and processing.*

Background

The unique connection that indigenous people, the original custodians of the land, have with forests is widely acknowledged and so is the urgent need for economic development in indigenous communities. Around 13% of Australia's forests are on Aboriginal owned land; however few Aboriginal people are directly involved in commercial utilisation of these forests. Forestry could play a much greater role in addressing socio-economic disadvantage and providing opportunity to indigenous people in Australia.

Forestry currently generates income for many landowners and communities around Australia, through active management of both native and plantation forests. These private forests are managed to produce a variety of products, from sawn timber and woodchips to eucalypt and sandalwood oil, charcoal, and biomass for energy production. Both private native forests and plantations can also be used as shelter and fodder for livestock, as windbreaks on farms, for protection of water quality and biodiversity services and for absorbing carbon dioxide from the atmosphere. Whilst many large scale forest industries are important contributors to several key regions around the country, many small enterprises and non-commercial forestry systems are also in place and important sources of income and value for their owners.

Discussion

AFG's primary interest in indigenous forestry is in seeing Aboriginal people initiate various forms of forestry for their own community, based on their own priorities and skills. Whilst increasing indigenous participation in existing forest industries is important, the development of new forest industries to benefit indigenous Australian communities is essential.

A lack of forestry and marketing expertise in some indigenous communities, in addition to the challenges presented by distance from markets for forest products, has limited the development of indigenous forestry to date. However the challenge presented by skills limitations is not unique to Aboriginal communities, and other individuals and communities involved in forestry have found ways of establishing

successful enterprises. Many farm forestry enterprises have started off with few technical skills and resources but have found ways of overcoming this – for example through education and training, and through joint venture partnerships with organisations skilled in forestry.

A joint venture is a partnership between two or more entities (e.g. a landowner and a forestry company). A typical arrangement between a landholder and a forestry company might see a forestry company take responsibility for establishing and managing a plantation for commercial (usually timber) production. The landowner might be paid a ‘rent’, and be involved to varying degrees (stated in a formal agreement) in management. There is a wide range of possible forms of joint venture that could be relevant to Aboriginal communities – it is important that they are mutually beneficial and provide a framework for managing forests towards agreed objectives.

There is a wealth of knowledge and skills already available in some indigenous communities where forests and woodlands are managed sustainably by indigenous people. Seeking out the experience of other indigenous people who are involved in forestry, as well as the experience of professional foresters in Australia and those with relevant experience overseas, will each be important for making forestry work for indigenous Australia.

AFG is a signatory along with the Australian Government and other forest industry associations to a Memorandum of Understanding (MOU) committed to supporting indigenous forestry. It aims to work together with indigenous people to expand the availability of the skilled workforce and build sustainable, prosperous communities in which individuals can be encouraged and supported into employment and business opportunities.

Australian Forest Growers seeks to help build trust and working relationships between indigenous people, forest growers and forestry professionals. AFG has members around Australia with expertise in sustainable utilisation of forests who are well placed to assist in making the connections, to help collaborative indigenous forestry initiatives can grow.

Preferred Outcomes

- Better collaboration between private forest growers and indigenous forest managers or land owners.
- The development of joint ventures between indigenous forest owners and forestry companies or organisations where a community or individual landowner is seeking economic investment.
- Increased availability of forestry education and training for indigenous people including government support via scholarship funding for indigenous participation in university level forestry education and programs such as the Master TreeGrower Program, and Coombell Farm Forestry.
- Increased sustainable, commercial utilisation of indigenous-owned or managed native forests to benefit indigenous communities.

ATTACHMENT C – AFG POLICY STATEMENT No. 10

CLIMATE CHANGE

Australian Forest Growers:

- *recognises the potential negative impacts of climate change on Australia's future forest and agricultural productivity;*
- *participates in debate on climate change, particularly related to the use of forest sinks to reduce the net impact of climate change; and*
- *advocates that all debate on climate change be underpinned by sound, repeatable science.*

Background

As with many agricultural industries, it is anticipated that the forest industry will be impacted by climate change. The area once considered commercially viable for plantations may shift geographically, shrink or in some cases expand. The native forest estate may also be affected. Commercial forestry in Australia on the other hand has a capacity to become a major CO₂ sink, where even harvested wood products hold carbon stores for the life of the product. Although there are still many uncertainties regarding the science of climate change, it is widely understood that wood production through commercial forestry should be significantly expanded to act as a sink for CO₂, thus having a positive role in the race towards slowing global warming. Future policy making regarding the need to adapt to a changing climate and reduce greenhouse gas emissions need to be underpinned by sound, repeatable science. The scientific literature demonstrates that actively growing forests have a significant role to play in climate change mitigation, and AFG will remain actively engaged as the national policy response evolves to fully recognise this.

Discussion

Australia's native forest estate has evolved under varying climatic conditions, from cold alpine heath, to the tropical rainforest in the north and the vast dry woodlands. Each of these forest types stand to be impacted in some ways by global warming. Possibly the greatest destruction period for our precious biodiversity is still yet to come. This is compounded by the economic and social devastation that threatens us in the forthcoming decades as global warming intensifies.

While our forests will almost definitely be impacted by climate change, forests can also be used to combat this threat. Actively growing forests can be used to sequester CO₂. Wood products, especially structural lumber and furniture timber effectively store carbon for the life of the products. Even paper has a positive carbon storage life. Steel and concrete on the other hand have limited capacity to store carbon, and in fact large volumes of greenhouse gases are emitted in their production. Wood production through forest harvesting is not only renewable, but replanting and regenerating is a sensible and readily attainable approach in our fight against climate change.

Preferred Outcomes

- A whole-of-government approach to enhancing capacity of the Australian forestry sector, to specifically combat the threat of climate change, through contributing to CO₂ capture and storage.
- Assurance that an actively growing forest's ability to abate climate change is considered when developing policy that impacts on the use of forests, especially existing native forests.

ATTACHMENT D – AFG POLICY STATEMENT No. 17

CHEMICAL USE AND PLANTATION FORESTRY

Australian Forest Growers advocates the following principles on chemical use in plantations:

- *explain how and why chemicals are used in plantations;*
- *communicate the issues around chemical use in plantations;*
- *encourage adherence to governing legislation, chemical use within label rates, and minimal use to obtain optimal results; and*
- *research and encourage options to reduce the use of chemicals that are scientifically proven to be harmful to the environment.*

Background

Plantation forestry receives close scrutiny regarding the use of chemical pesticides, perhaps significantly more so than other land uses such as broad-acre agriculture. Some environmental groups have raised concerns about plantation forestry practices and the toxicity and residual nature of some chemicals. Concerns generally relate to the risk of off-target damage, such as water pollution and native animal poisoning. AFG does not accept that chemical use in plantations carries any greater risk than in agriculture generally; nevertheless, AFG advocates the careful and vigilant use of chemicals.

Commercial plantation growers recognise that economic timber production often relies on the use of chemical pesticides, including herbicides, insecticides, fertilisers and fungicides. However, chemical application in plantation development cannot be conducted without adhering to strict standards imposed by Forest Practices Codes, via Australian Pesticides and Veterinary Medicines Authority (APVMA) registration and labelling, as well as other State agency control of chemical usage legislation. Even with these guidelines and standards in place, AFG is committed to continually improving knowledge exchange and efficiencies in chemical use.

Discussion

There are regular and significant enhancements in the way in which chemicals are used for commercial forest establishment in Australia. Chemicals are increasingly becoming safer for both the user and the environment. For example, granular herbicides are becoming more regularly used in plantation establishment to replace the easily soluble and sometimes volatile, liquid herbicides. Chemical applications for establishing plantation forests are also increasingly being applied on more site specific situations, including, where possible and appropriate, such technologies as spot and band spraying rather than aerial spraying, where possible and appropriate, to reduce the volume of chemical applied.

Toxicity in waterways from inappropriate chemical use is often blamed on the forestry industry, whereas other types of primary production are equally-likely contributors. The use of retaining buffer strips adjacent to waterways to prevent chemical pollution into the water is one example where the plantation industry is practising sound land and water resource management.

AFG advocates the sensible and informed use of chemicals in the plantation industry, but also supports options to reduce the use of chemicals that are scientifically proven to be harmful to the environment. Chemical use is just one tool in integrated pest, disease and weed management, yet it plays a pivotal role in maintaining plantation health and productive capacity. Plantation growers need all these tools at their disposal for 'best practise' techniques in successful tree establishment. Precautions such as retaining buffer strips around waterways and not applying chemicals to waterlogged soils or just prior to heavy rainfall events are all strategies endorsed by AFG. AFG also strongly supports ongoing research and development into chemicals used in plantations, so as to provide the most accurate and appropriate advice to our members.

Preferred Outcomes

- Governments providing transparent and comparable legislation as the basis for chemical use compliance in plantations, consistent with all other forms of primary production.
- Adequate chemical alternatives for use in plantations identified and made domestically available to replace specific chemicals being removed from the market, based on research identifying health and environmental issues relating to its use.
- Promotion of independent analysis of chemical use by plantations, compared with other land use sectors.