

# The plantation debacle.

Dailan Pugh, North east Forest Alliance, August 2022.

I represented conservation interests on State Forests' Eucalypt Plantation Technical Advisory Committee (EPTAC) established in 1997 to review areas that State Forests were retrospectively claiming accreditation for under the Timber Plantations (Harvest Guarantee) Act 1995. At that time I identified numerous areas that did not satisfy the definition, that were subsequently accredited. Our experience with two current logging operations in Wild Cattle Creek and Ellis State Forest, within the proposed Great Koala National Park, shows the plantation accreditation process to still be a sham, able to be chopped and changed at a whim.

In Wild Cattle Creek, 68 ha of native forest is currently being converted to plantation, after the Forestry Corporation had it accredited as plantation in May 2020 based on claims they scattered some seed after logging in the 1960s and 70s, of the same species that naturally occur there. In Ellis they had 293.5 ha long identified as prohibited from logging as Hardwood Plantation (Retention), within an accredited plantation, redefined in August 2020 as being outside the plantation so that it can be logged.

The Forest Corporation relies upon the online [Defined Forest Area map](#) for their Chain of Custody under the Australian Forestry Standard, to enable customers to trace timber back to source. In Wild Cattle Creek the Defined Forest Area map identifies the area where they are now logging as native forest, yet they will be selling it to customers as plantation. In Ellis the Defined Forest Area map identifies the native forest they are currently logging as plantation, though it is not known what they are selling it as. These two examples demonstrate that the Forestry Corporation's Chain of Custody is worthless.

After an inspection, on 26 July 2022 I submitted a 'Complaint about Conversion of 68ha of Native Forest to Plantation' relating to the logging of 68ha of native forest in compartments 61, 62 and 63 of Wild Cattle Creek State Forest as plantations. All the evidence was that it is native forest, such as the Forestry Corporation's Research Note 17 mapping it as Forest Types Blackbutt (36 and 37), Tallowood-Blue Gum (47) and Brush Box (53a), and all the various mappings since then identifying it as native forest, including the current Forest Management Zoning identifying it as FMZ 4 (General Management Zone, rather than FMZ 5 Hardwood Plantation Zone) and the current legal online [Defined Forest Area map](#) (relied upon for Chain of Custody (COC) Certification to the AFS) identifying it as native forest: "Northern Coastal Hardwoods". Even the current CIFOA regulatory layers identify it as native forests, with Koala prescriptions 1 and 2 (retention of 5-10 koala feed trees per ha.) as applying.

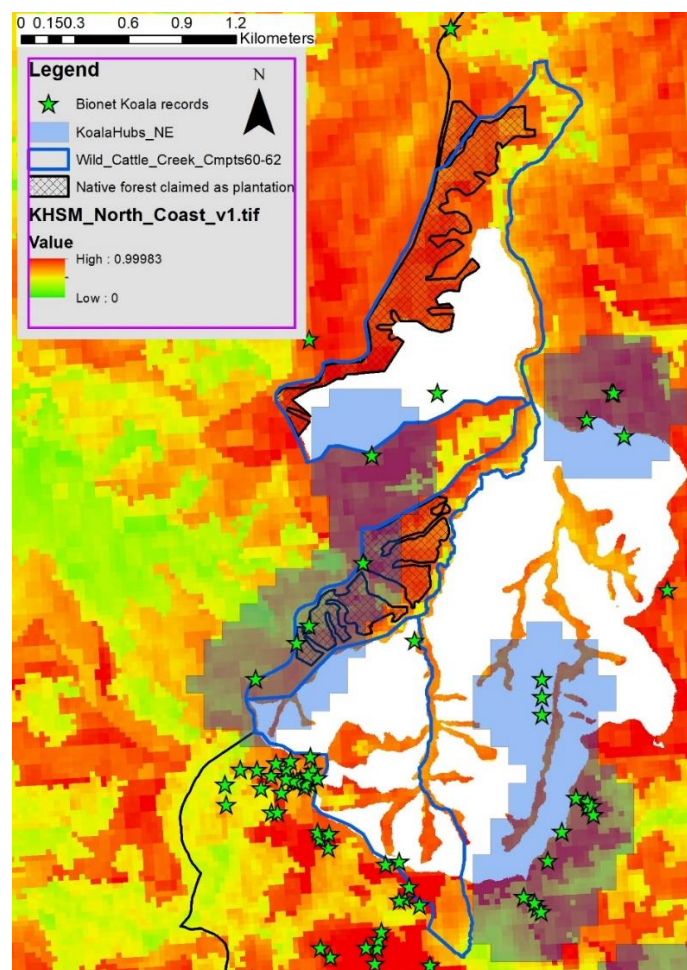






Native forest being clearfelled for conversion to plantations to the south-west of log dump 7 in Compartment 61 of Wild Cattle Creek State Forest.

I was particularly concerned as the area was mapped as high quality Koala habitat and in 2017 the Office of Environment and Heritage identified most of Compartment 61 as being within a Koala Hub – *“highly significant local scale areas of koala occupancy currently known for protection”*. We observed numerous stumps of Tallowwood (a preferred koala feed tree) amongst the clearfelled area, large branches from mature trees in the slash piles, and that it is being replanted with rows of Blackbutt (not a feed tree).

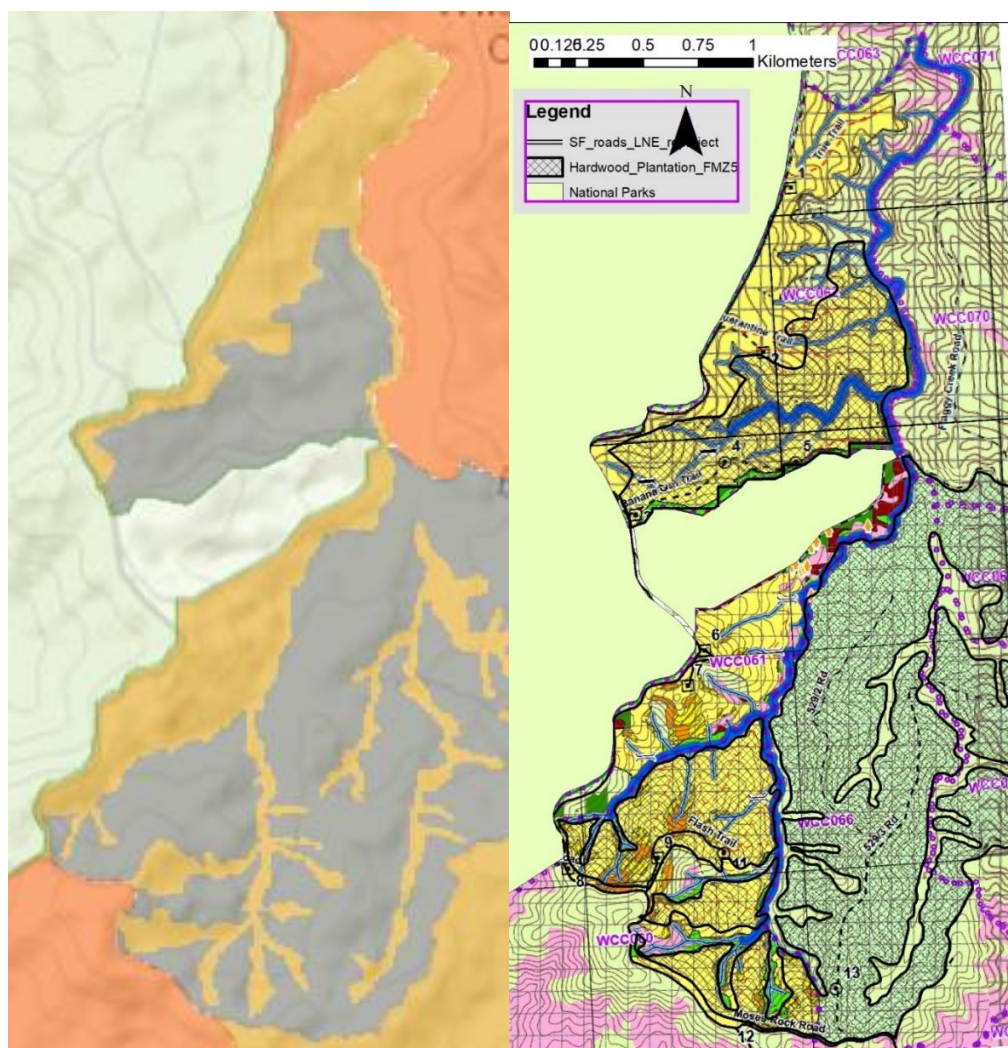


DPIE Koala suitability habitat value mapping (red is highest) and Bionet Koala records, overlaid with the native forest being converted to plantations and OEH Koala Hubs.

The EPA (3 August) responded that *“the areas subject to your complaint are authorised for plantation forestry under the Plantations and Reafforestation Act 1999. These approvals are not*



adequately reflected in mapping layers and the DPI has committed to updating its spatial mapping databases". My complaint was handed onto DPI.



LEFT: A current Forestry Corporation [Defined Forest Area map](#), which identifies the forests certified to the Australian Standard for Sustainable Forest Management as well as which Forest Management Unit they belong to (grey is plantation, yellow and orange are native forest), which confirms that the native forest being converted to plantations is not currently plantation. RIGHT: FMZ 5 plantations overlaid on harvesting plan (yellow is the area being logged as plantation).

While this area has never been previously claimed as a plantation, DPI informed me that in May 2020 it was retrospectively accredited as a plantation, which they claim was established in the 1960s and 1970s. The advice I received from DPI is that accreditation is based on claims some seeds were sown after logging in the 1960s and 70s, and it was also thinned (as native forest) in the 1990s and early 2000s. I am not allowed to see the supporting information they are relying on, I was told probably not even under a GI(PA) request. Given that the requirement for a plantation is that more than 50% of the canopy is formed by planted trees I don't see how they can determine to what extent it was seeded, or that regrowth was from the sown seed rather than natural seed remaining after logging as, like the regrowth, the natural forest was predominately Blackbutt. In response to my complaint, DPI (19 August 2022) responded:

*The existing plantation was authorised on 18th May 2020. The area was authorised after assessment of evidence and information that showed the area was a plantation as defined by the Plantations and Reafforestation Act and was established prior to commencement of the legislation.*

*Compartment 529 records dated back to the 1960s and following clearing in the 1960s was sown with flooded gum and blackbutt. Some fire and harvest activities took place in the*

1990s. Compartment 528 also had historical records showing clearing and sowing of timber species in the early 1970s. That area was partially thinned in the early 2000s.

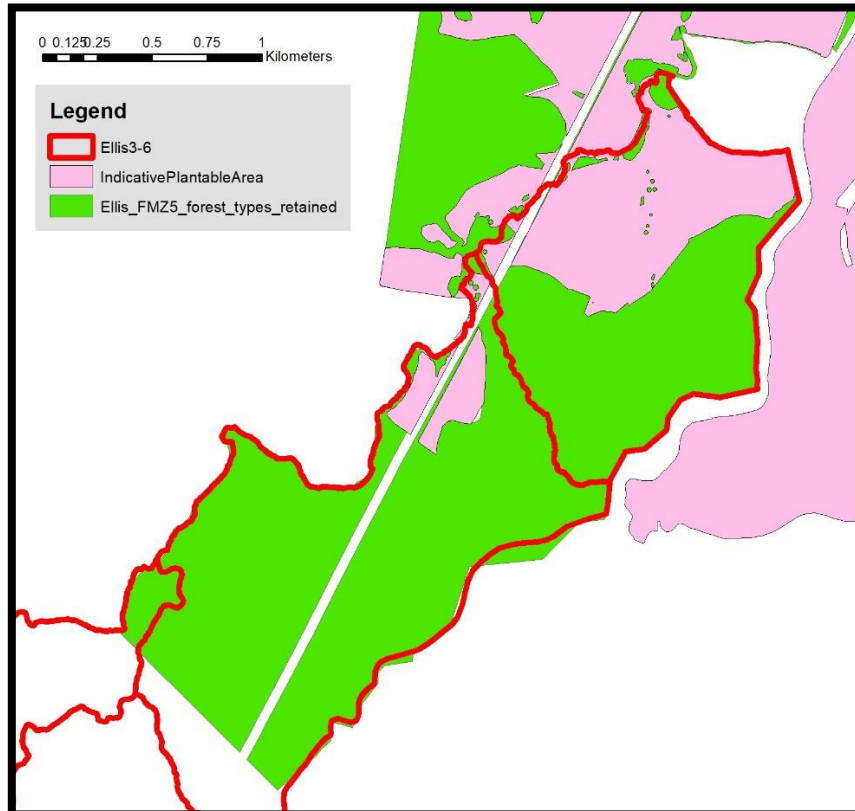
Other evidence that supported assessment of the area as an existing plantation included historical imagery and historical documents including harvest plans.

I do not accept that it is a valid plantation, particularly as its now being claimed as plantation some 50 years after it was claimed to have been established, and even though these forests are not included on the Defined Forest Area map, all the timber obtained from them will be being sold as plantation timber, which makes a mockery of the Forestry Corporation's Chain of Custody.

Soon after this, I reviewed Compartments 3, 4 and part 6 of Ellis State Forest which are currently being logged, on which Forestry Corporation mapping identifies 356ha as FMZ 5 Hardwood Plantation, which is also mapped on the online [Defined Forest Area map](#) as plantation. Forestry Corporation's Research Note 17 mapping variously identifies 293.5 ha as native forest types 163 New England Blackbutt, 37 Dry Blackbutt, with some 47 Tallowwood-Blue Gum, and 168 Silvertop Stringybark-Gum, and on a different map as the single category Hardwood Plantation (Retention). I similarly complained to DPI that the mapped native forest within the plantation was being illegally logged, as the Plantations and Reafforestation Act 1999 does not allow logging of native forests within plantations.

The DPI informed me that the plantations in Ellis were originally approved under the Timber Plantations (Harvest Guarantee) Act 1995, though were apparently redefined in August 2020 to remove the large blocks of Hardwood Plantation (Retention), so they could now be logged. The online [Defined Forest Area map](#) has not been updated to reflect this.

I checked the logging history which identifies most of those areas being logged in 2001, after they were accredited under the TPHG Act, though I have yet to resolve whether this earlier logging was illegal. The question is whether this timber too was sold to customers as plantation timber.



FMZ 5 claimed plantations in Ellis SF accredited under the TP(HG) Act, the green areas are native forests classed as Hardwood Plantation (Retained) that were removed in 2020 (though are still shown as plantation on the Defined Forest Area map), and the pink areas are the re-accredited areas, with the Hardwood Plantation (Retained) areas within compartments 3, 4 and 6 logged in 2001 and now being relogged as native forest.