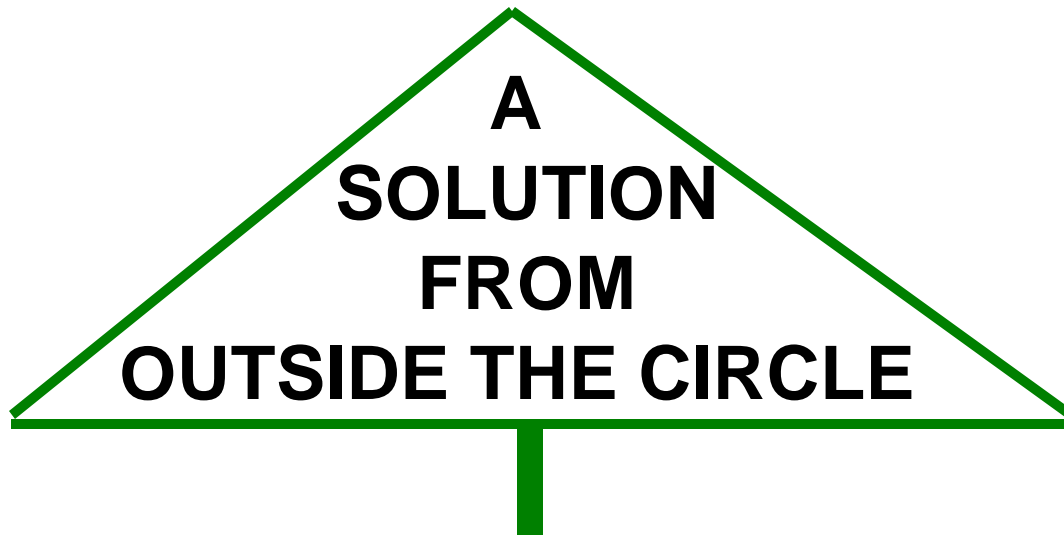


To:
Chair
West Victoria RFA Independent Panel
PO Box 502
EAST MELBOURNE VICTORIA 3002

A SUBMISSION ABOUT THE WEST VICTORIA RFA



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1. ACHIEVING BIODIVERSITY

In the West Victoria RFA Consultation Paper it is stated that (Ch 3, p13):

“The national reserve criteria for biodiversity specify that as a general criterion, 15 percent of the pre-1750 distribution of each forest ecosystem should be protected in the CAR reserve system with flexibility considerations applied according to regional circumstances, and recognising that as far as possible and practicable, the proportion of dedicated reserves should be maximised”.

There are some instances as follows:

| EVC | LEVEL OF PROTECTION IN NATIONAL RESERVE CRITERIA | LEVEL OF PROTECTION IN DRAFT CAR | COMMENTS |
|-----------------------------|--|----------------------------------|--|
| Plains Grassy Woodland | 100% of remaining extent | 33% of remaining extent | 30% occurs on private land Possibly low impact selected harvesting for local redgum industry. May be amend or phase out grazing activities |
| Herb Rich Foothill Woodland | 60% of remaining extent | 30% of remaining extent | Increasing protection to 60% would significantly reduce timber resources available to industry. |

Other instances where the national reserve criteria will not be met by levels of protection proposed by the draft CAR are listed in chapter 3, page 43 of the West Victoria RFA Consultation Paper.

It appears that by failing to try any further to achieve the level of protection required under the national reserve criteria, there is a failure to try any further to achieve biodiversity in these EVCs.

It is stated in the consultation paper that (Ch 3, p14):

“Twenty-one EVCs are not fully protected due to the fragmented and small size of the remaining extent, requirements for timber resources and regional communities needs for domestic firewood and other forest products”.

The above paragraph suggests three reasons for not fully protecting 21 EVCs.

1. The fragmented and small size of the remaining extent.
2. Requirements for timber resources
3. Regional communities needs for domestic firewood and other forest products.

Items 2 and 3 in this case are virtually the same, i.e. the demand for firewood and other forest products all of which are just timber resources with different levels of value adding. If “other forest products” in this case included understorey products or non timber forest products, then that would be another reason IN FAVOUR of fully protecting these EVCs.

It is the humble opinion of the author that the fragmented and small size of the remaining extent (item 1) is in itself a reason to “go the extra mile” to fully protecting these EVCs and areas between these EVCs. This protection will ensure that the remaining extent of these vulnerable or rare EVCs will no longer be fragmented or small.

This solution would mean protecting land between the fragments. There is a high probability that this land is used for agricultural activities. There are a number of instances that refer to agricultural activities as follows:

“Past agriculture and clearing practices have significantly reduced the extent of many of these EVCs with the result that less than 15 per cent of pre-1750 distribution remains” (Ch 3, p12)

“Plains Grassy Woodland has been depleted to approximately three per cent of the pre-1750 distribution largely as a result of agricultural activities.” (Ch 3, p14)

“Grazing activities will be reviewed to consider the effects...” (Ch 3, p14)

“Herb-rich Foothill Forestis a vulnerable EVC resulting from past agricultural clearing.” (Ch 3, p43)

“A number of EVCs that are now substantially depleted (largely due to clearing for agriculture)...” (Ch 3, p43-44)

“Grazing is recognised as a threat to the integrity of a number of EVCs.” (Ch 3, p57)

“Grazing is currently being phased out of some areas containing Plains Grassy Woodland...for improved protection of the grass and herb components of that EVC.” (Ch 3, p58)

The West Victoria Regional Forest Agreement Consultation Paper also states the following:

“The National Forest Policy Statement (NFPS) established that the CAR reserve system will in the first instance be selected from public land.” (Ch 3, p58)

“Most EVCs in the West region have been identified as endangered, vulnerable or rare. As shown in table 3.1, for several of these EVCs the majority or all of their occurrence is on private land. Consequently their representation in the draft CAR reserve system on public land is limited.” (Ch 3, p13)

It is the humble opinion of the author that for the West Victoria RFA, the first instance (selection from public land) has been partly explored but the second instance (selection from private land) has not been explored widely enough.

With regard to the CAR reserve system selecting from private land the consultation paper states:

“The criteria also provide for the inclusion of private land in the CAR reserve system, with the agreement of landholders, where the criteria cannot be met from public land”.(Ch 3, p12)

and

“Within the West region, 34 endangered, vulnerable or rare EVCs occur largely on private land.” (Ch 3, p59)

The mechanisms for protection of biodiversity (under the flora and Fauna Guarantee Act 1988, & other acts on p59) appear to be as follows:

1. Purchasing land
2. Statutory protection (p59)
3. Binding agreements (such as covenants) (p59)
4. Voluntary conservation covenants (p59)
5. Non binding agreements (p59)

It is stated that (p59) :

“Governments are working cooperatively with land holders for the conservation of habitats on private land”.

The consultation paper also states (p59):

“Conservation covenants in the west region cover over 2,271 hectares however the exact area has not been determined.”

The consultation paper states (p1):

“Private land comprises some 4.7 million hectares or 81 per cent of the region and is mostly cleared and used for a range of agricultural and industrial pursuits.”

Based on these figures, over 0.048% of private land in the west region is under some sort of conservation covenants. Further calculations determine 0.039% of the West region is under a conservation covenant.

A number of questions are therefore raised:

1. Why has the exact area of conservation covenant in the west region not been determined?
2. Are the conservation covenants covering 2,271 hectares binding agreements or voluntary covenants?
3. Are these covenants monitored and if so how?
4. How much land has been purchased (or is proposed to be purchased) from the private sector to assist in achieving the national reserve criteria for biodiversity?

5. Are there any proposals for the statutory protection of land and if so what are they?
6. Are there any proposals for binding agreements (other than covenants) with private land holders and if so what are these proposals?
7. Which Governments are working with landholders and are enough resources being provided for this task by the State and Federal Governments?

The author understands that precise details of commercial transactions can not be publicised as it may jeopardize one's bargaining position, however broad descriptions could be provided.

It appears that the mechanisms to protect significant conservation values on private land have not been used widely enough.

Again (Ch 3, p58):

“The National Forest Policy Statement (NFPS) established that the CAR reserve system will in the first instance be selected from public land.”

The second instance has not been adequately explored.

2. A SOLUTION OUTSIDE THE CIRCLE

There are two conflicting interests:

1. The need to provide jobs and economic growth to regional areas
2. The need to preserve forests

The problem has for many years been intractable. Debate has become polarised. A solution does exist if proponents of each argument can look outside the circle.

William Conde (American Timber Merchant) stated:

“Trees are fibre, hemp is fibre. Hemp is a far superior fibre!”

Private land, mostly used for agricultural pursuits can be used to grow hemp. Originals of this submission are written on hemp paper (unfortunately imported from the U.K.).

The CSIRO Division of Forestry and Forest Products report No 727 (December 1999) concluded:

“Chopped hemp stems whether in the form of short or long strand material can be refined in a conventional disc refiner to produce fibre suitable for MDF panelboard production.”

The masters thesis:

Gemmell A., 1998, An Investigation and Comparison of Hemp and Pine Panels, RMIT Department of Building and Construction Economics, p81 states:

“From the results obtained we can state that panels made from hemp hurds passed through a 4mm filter are at least 56% stronger in bending than panels made from pine chips passed through a 4mm filter.”

Agricultural pursuits have been the cause of forest depletion and agricultural pursuits can be the solution to the problem. Private land owners whose land is needed to meet the national

reserve criteria could be provided with an equivalent area of land in an area that is not needed to meet the national reserve criteria for protection of biodiversity. Specifications for government building projects could be written to include the use of hemp MDF, hemp particleboard or a variety of other hemp based building materials already being developed in Europe and Canada. This would cost little and guarantee a market for the hemp crop.

In modern times the processing of hemp stems is not difficult.

Victoria has at least two conventional disc refiners capable of processing chopped hemp stems and one of these refiners has already produce small amounts of hemp MDF and 50:50 hemp/pine MDF for mechanical testing. (CSIRO Forestry and Forest Products report No 733).

To achieve the highest level of value adding the long bast fibres on the outside of the hemp stems should be separated from the woody hurd material which surround the hollow central core of the hemp stem. There is only one motor driven decorticating machine in Australia (in NSW) however modern machinery could be modified to do the job. This machine could be mobile or factory based at a regional location.

We now come to specifics. A regional location suitable for a hemp processing plant should be near a major centre which would act as a market for the hemp products. A second criteria for the location of a hemp processing plant is that it should assist in ameliorating any negative economic and social impacts of land use proposals.

Based on figures shown in Tables 4.7, 4.8 and 4.9 of the Consultation paper there may be negative economic and social impacts of land uses proposals in Beaufort which already has an unemployment rate of 14.32 per cent.

3. BEAFORT and BALLARAT

Agriculture Victoria supervised hemp trials between 1995 and 1997 near Ballarat yielded up to 28.6 tonnes per hectare under irrigation depending on variety.

Lolicato S. Bluett C. Blackstock J., 1996, Low-THC Indian Hemp (*Cannabis sativa* L.)
Trials in Victoria

A North American company is continuing to trial hemp near Ballarat this time for its valuable oilseed.

A Victorian company with construction industry links, is currently growing two trial crops near the Pyrenees Ranges north of Beaufort. The same company has worked with the CSIRO Forestry and Forest Products Division to produce medium density fibreboard (MDF) and particleboard. MDF and particleboard are extensively used for furniture and flooring respectively.

The consultation paper states:

“Value adding in the saw milling sector offers the greatest scope as market opportunities are available both domestically and internationally. The most promising product outlets are in flooring, external appearance products and furniture. The potential industry development opportunities in Victoria with high priority for assistance are listed in Table 4.2” (Ch4, p4)

This raises the question:

Why do sawmilling sector industry development opportunities have a high priority for assistance when hemp industry development opportunities (which produce stronger products) have no priority for assistance?

The consultation paper states:

“There are 11 mills within this TRC that may be impacted by changes in resource from the Midlands FMA. They include four mills at Daylesford, two mills at Beaufort and mills at Trentham.....”

The two mills at Beaufort are shown in photos below. Both mills at Beaufort have land for sale adjacent to the mill. In order to minimise the impact of changes in resource from the Midlands FMA why not provide assistance for a pilot hemp processing plant. Hemp is the source of the worlds strongest natural fibre, a woody material called the hurd (from which stronger particleboards can be made) and an oil seed rich in omega 3 essential fatty acids. Structural adjustment problems could be minimised if the land adjacent to the timber mills in Beaufort could be used to employ locals to build and operate a pilot hemp processing plant.

In relation to the Forest Industry Structural Adjustment package (FISAP), the consultation paper states:

“The program is designed to ameliorate any immediate adjustment impacts on workers and business in the native forest industry, and to facilitate investment in the production of value added wood products through restructuring assistance.” (Ch 4, p 18)

This prompts the questions:

1. When value added hemp products are superior to the equivalent wood products (MDF, particleboard, paper), why should investment be facilitated for the inferior products?
2. When value added hemp products are superior to the equivalent wood products (MDF, particleboard, paper), why should restructuring assistance be provided for the inferior products?

Research has also been undertaken at RMIT in Victoria to use the long, strong hemp fibres as the base matrix in plastics.

It is the humble opinion of the author that providing assistance for wood products without providing assistance for hemp products is against the interests of fair competition.

Beaufort has two timber mills, is close to the major regional centre of Ballarat and may very well need some structural adjustment assistance. Beaufort is an ideal location for a pilot hemp processing facility.

4. GEELONG and SURROUNDS

The pilot processing plant in Beaufort could lead to a major processing plant serving the industries of Geelong (and in the long term Melbourne).

Winchelsea (about 35km west of Geelong) was the only Agriculture Victoria supervised trial hemp site that was not irrigated. This crop was harvested 84 days after sowing and yielded up to 17.4 tonnes per hectare depending on variety.

Lolicato S. et al , 1996

There are timber mills at Colac, Birregurra, Barongarook , Forest and Moolap and a residual log mill in Geelong.

There are many protests about logging in the Otway ranges and exporting woodchips.

There are extensive areas of private land and large water supplies north of Colac, south of Cressy, west to Camperdown and east through Winchelsea to Geelong.

Even with existing European hemp varieties, large hemp plantations could be grown in this area. A substantial processing facility could be located at Colac. Employment at the hemp processing facility and on the hemp farms could more than ameliorate any structural adjustment impacts on workers and businesses affected by land use changes. Industry in Geelong would benefit from the use of superior and environmentally friendly hemp products.

5. ACHIEVING GOALS, JOBS and FAIR COMPETITION

Despite the polarity of debate and the adversarial nature of past encounters, there can still be a win-win outcome:

- The goal of achieving the national reserve criteria for biodiversity can be met by further exploring the use of private land.
- The economic and social impact of adjustment to changes in land use can be more than ameliorated. Extra jobs will be created directly in the hemp industry and indirectly in tourism due to an increase in the extent of native forests, flora and fauna.
- A new (ancient) industry can be allowed to compete on fair terms within Victoria, so that eventually the Australian hemp industry might catch up with Canada and a number of European countries.