



April, 2011

Senate Standing Committee on Rural Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Via email: arff.reps@aph.gov.au

Dear Committee Secretary,

Inquiry into the current and future prospects of the Australian forestry industry

Please accept the following submission from the CFMEU for consideration by the House of Representatives Standing Committee on Agriculture, Resources, Fisheries and Forestry into the current and future prospects of the Australian forestry industry.

Sincerely,

Michael O'Connor,

A handwritten signature in black ink, appearing to read 'Michael O'Connor', is positioned below the typed name.

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CFMEU

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CFMEU submission: Inquiry into the current and future prospects of the Australian forestry industry

1. The Construction, Forestry, Mining and Energy Union of Australia, (CFMEU) welcomes the opportunity to make this submission. The CFMEU consists of three Divisions namely the Mining and Energy Division, Forestry and Furnishing Products Division and the Construction and General Division. We are the major union in these industries.
2. This inquiry should address all aspects of the forest industry resource, market and employment crisis. This inquiry should attend to the policy settings which have led to the dire situation faced by the industry and its workers. Although there are other important factors endemic in the industry crisis, the main focus of this submission will highlight factors including policy failures causing resource insecurity and domestic market insecurity (with a focus on the weaknesses of Australia's anti-dumping and countervailing system)

Resource Insecurity

National Forest Policy Statement

3. Resource insecurity adversely affects prospects for investment, growth in downstream processing, value adding and employment in the forest based industry's communities. The industry faces a resource crisis which calls into question the Government's policy framework for the management of Australia's forests. The National Forest Policy Statement and its resultant public policy instruments have received union, employer and bi-partisan government support in the past; however, the instruments have not delivered the policy to provide resource security for the industry. Scrutiny of the public policy instruments meant to be responsible for providing resource security to industry demonstrates a fundamental failure.

4. The terms of reference for this inquiry include: ‘The environmental impacts of forestry including the development of win-win outcomes in balancing environment costs with economic opportunities’. The National Forest Policy Statement has not led to the economic opportunities for the industry required by forest dependent workers, families and communities. This submission will concentrate on the failure of two policy instrument dealing with resource insecurity for the industry; Regional Forest Agreements and the Plantation 2020 Strategy.

Regional Forest Agreements

5. Regional Forest Agreements are meant to provide certainty for the forest based industry and native forest dependent communities. The RFAs have in our view delivered no such certainty. Forest based industries cannot be robust when agreements fail to deliver and cannot distribute on an ongoing basis the wood volumes as specified in the agreements. In our view this has been a characteristic of all ten agreements. This climate of uncertainty has led to a lack of significant industry growth and severely stunted possible economic opportunities.
6. Practical observation and projections of wood volumes and profiles would suggest this resource crisis is prevalent in New South Wales, Western Australia and Tasmania with serious question marks over Victoria’s capacity to provide adequate log volumes to existing industry. Our assessment is that key requirements are not being met and/or are not projected to be met in terms of quality and/or quantity of log volumes. It is the Union’s appraisal that this resource profile will only become worse, particularly under current policy settings.
7. RFAs have not just cost resource security; they have also not delivered market security. Although not the focus of this submission, it would be negligent not to mention that the expectation that the significant addition to the forest reserve system would lead to market security, has not been met. It needs to be noted that some major Environment Non Government Organisations, contrary to the facts; either do not concede positive environment outcomes from the RFAs or think that the outcomes are not good enough, a stance which lacks credibility and is socially, economically and environmentally

irresponsible. This has added to the commodity market insecurity and the inability to attract investment.

8. To promote resource security for the hardwood advanced processing industry, the development of a different policy, or at least an instrument different to RFAs, is required. Native forest management through the RFAs has not led to the intended policy outcomes designed to promote economic and social sustainability for timber dependent communities.

Plantations 2020 Strategy

9. The Plantations 2020 strategy is a policy instrument implemented with the intention of enhancing regional wealth creation and international competitiveness through a sustainable increase (a trebling) of Australia's plantations.

Currently the situation for the industry is that:

- Harvested pine plantation resources are not being replaced at a rate sufficient to meet the needs of the current processing industry.
- The majority of the plantations established under the Plantations 2020 strategy (short rotation hardwood eucalyptus pulp logs) have no local processing market and traditional export markets are increasingly uncertain.

Softwood Resource Insecurity

10. Softwood plantation establishment under the strategy has been negligible, particularly in comparison to hardwood plantation establishment (150% growth in ten years for hardwood plantations compared to 8% growth in ten years for softwood). This low rate of growth has caused a situation of resource insecurity for local softwood processors and has affected investment and contributed to job losses and enterprise closures.

11. Softwood resource establishment has not grown at a rate required by industry and dependent communities partly as it has been in competition with plantation hardwood eucalypt establishment. The effect of new plantation hardwood established under the strategy being financed largely through Managed Investment Schemes (MIS). Under MIS there is a perceived greater up front taxation advantage for plantation establishment managed for 10-12 year rotations. This is in contrast to the 25-40 years management regime required for softwood, and undoubtedly a factor causing lack of adequate growth in plantation softwood establishment.

Hardwood Resource Insecurity

12. Under the strategy, the massive increase in plantations has predominately been in short rotation hardwood plantations, largely funded through Managed Investment Schemes (some 80% of plantation establishment). The resources of hardwood plantation are predominately not being grown to supplement decreasing hardwood saw and veneer log resources from native forests.

13. There is no local processor demand and no significant local market for the resource (although there is a processing proposal in Tasmania). The resource is therefore currently predominately reliant on access to the raw chip export market. This market faces grave uncertainties and fluctuations in price and demand is increasingly common. This uncertainty in demand for the end product is combining with a lack of investor confidence in the traditional financing mechanism of short rotation pulp wood; that is Managed Investment Schemes.

14. The expected reforestation for second rotations after the first 10-12 year harvest is in serious jeopardy. Further there is a question mark on the viability to re-plant for pine in some areas of current hardwood plantation due to uncertainty about plantation status under the National Water Initiative and the states' respective interpretations. This is not just a crisis for the industry and the important contribution the industry provides to regional communities, workers and their families. It also has environmental implications as Australia faces potentially the largest deforestation event in its history with some assessments predicting a 35%-50% reduction in the planted hardwood area of 99 million hectares with established areas reverting back to non-forested land use.

15. It is the Government's responsibility to develop the appropriate public policy response that can put the industry back on a sustainable footing from a resource perspective. The CFMEU would like to be consulted in the formulation of new policy instruments emerging from this inquiry.

(See Appendix regarding comparative plantation establishment under the strategy)

Domestic Market Insecurity

16. Achieving resource security for the industry will be unproductive without the opportunity for it to compete on a level playing field on an ongoing basis. As a first step in ensuring a level playing field, Australia's anti-dumping and countervailing system requires immediate attention in order to ensure that it is effective in preventing injury to local industry from the dumping of forest products at below 'normal value' or from imports at a price which does not take into account unfair subsidisation in exporting countries.
17. Alleviation from material injury caused by dumping and subsidisation is local industry's right under the World Trade Organisations' (WTO's) Anti-Dumping Agreement. CFMEU members have observed that other countries are able to balance their responsibilities much more effectively than Australia in order to defend local industry against the excesses of unfair trade. These other countries do this through the application of anti-dumping and countervailing duties whilst concurrently remaining compliant with their international obligations, despite Australia having the same international obligations under the WTO. Recent examples of this include the imposition of duties on dumped/and or subsidised paper imports.
18. The CFMEU considers Australia's anti-dumping and countervailing system seriously flawed. The system time and time again has proven to be inaccessible, expensive, complicated and unresponsive to the concerns and requirements of local industries and unions. This is of particular concern to the forest industry as it needs to be acknowledged that Australian producers are both subjected to and limited by response inhibitors to unfair trade including tough local competition laws and sustainable management of Australia's forests. This means that the combating of, for instance, artificially lower log

input prices from ‘free’ forestry concessions in competing countries, often relies on an effective anti-dumping and countervailing system in Australia.

19. Legislative amendments are one of a number of initiatives in the complex and multi-faceted task ahead of reforming the anti-dumping and countervailing system in the national interest and which may be required in order to reconfigure the system to ensure its responsiveness and effectiveness to the local forest industry and the workers, families and communities which rely on it. It is anticipated that sectors under threat from cheap imports including the pulp and paper sector, the plywood sector, the structural timber sector and, as a result, the entire integrated industry would benefit from reform of the system. Conversely, the continued prevalence of a weak anti-dumping system has the potential to decimate thousands of jobs in the industry including in regional Australia.

Background

20. In recent times the weakness of Australia’s anti-dumping and countervailing system has been recognised by a significant proportion of forest products businesses and industry associations in recent times. For instance, in the last few years remedy through anti-dumping duties has been unsuccessfully applied for by forest products companies, including SCA hygiene, Kimberly Clark, Big River Timbers, Carter Holt Harvey and Boral. Concern regarding the lack of an acceptable result from these applications has accompanied and exacerbated apprehension about the system by companies such as Gunns and Australia Paper who, along with a number of the aforementioned companies, attended an anti-dumping roundtable jointly hosted by the CFMEU, AMWU, and AWU on April 20 2011 in Sydney.
21. A representative of the new Australian Forest Products Association also attended the Roundtable. Their support of the Roundtable’s endorsed guiding principles suggested that the previously held concerns of the two separate bodies (NAFI and AP3) about the

weaknesses of the anti-dumping system and its proposed further weakening through the introduction of the public interest test is an ongoing concern of the entire industry.¹

22. The roundtable endorsed the following as an agreed set of guiding principles required for the reformation of the system:

- A properly resourced, independent anti-dumping and countervailing system.
- Relevant agencies, in particular Customs and the TMRO must respond proactively to dumping and subsidy complaints and undertake appeals openly, transparently, expertly and fairly;
- Improving the culture and technical capabilities of Customs aimed at assisting local industry and compliance with Customs decisions by all parties;
- Consider treating Chinese exports via state owned enterprises via separate agreement, like other state owned enterprises in other developed economies consistent with China's market economy status;
- Reflect WTO rights in Australia's anti-dumping and countervailing systems legal trade defences, rather than industry protection;
- Amend the Customs Act to acknowledge that unions should have the right to petition for investigations in particular on behalf of smaller employers;

¹ For instance NAFI has emphasised the need for Government to: 'Address anti-dumping issues to ensure the domestic industry, local jobs and reliant communities are protected from the effects of dumping of forest product imports.'

NAFI, 'Forest Industry Growth Plan', 08/10/10, p 10, available online @:
[http://www.nafi.com.au/userfiles/publication/NAFI%20Forest%20Industries%20Growth%20Plan%202010%20\(full\).pdf](http://www.nafi.com.au/userfiles/publication/NAFI%20Forest%20Industries%20Growth%20Plan%202010%20(full).pdf)

In response to the proposal for the introduction for the public interest test (based on a domestic competition imperative), AP3 pointed out the absurdity of this: 'an outcome, such as the discontinuation of industrial jobs in regional Australia, may be seen as a desirable public interest outcome'

AP3, 'Submission', *Productivity Commission's Inquiry into Australia's Anti-Dumping and Countervailing System*, p 3, available online @:
http://www.pc.gov.au/data/assets/pdf_file/0009/92196/subdr045.pdf

- Strong local content requirements encouraging the local supply chain to manufacture and source locally; and
- Oppose any narrow Public Interest test, which undermines anti-dumping measures.²

The principles endorsed by the Roundtable are not radical, but provide an opportunity for a more level playing field to be delivered for the Australian forest industry.

Forest Industry Case Studies

23. Some forest industry case studies, demonstrate the extent of the problems for the industry, in the current system:

Pulp and Paper

24. The recent toilet paper dumping case (Report 138) and the reinvestigation report (Report 158) have highlighted a serious technical flaw in Australia's anti-dumping system and the appeal process. In the original decision, Customs and Border Protection found that some toilet paper from Indonesia and China was being dumped into Australia causing material injury. In December 2008 the Minister imposed dumping duties. An appeal led to the Minister calling for a reinvestigation of the findings that were carried out by the Trade Measures Review Officer. The main finding of the reinvestigation was that factors other than dumping were more important in causing material injury. Accordingly, the original decision was overturned. However, under Section 269ZZL(2)(9)(i), in conducting the review Customs and Border Protection must have regard only to information and conclusions based upon the relevant information in the original case. If the conditions of the review do not satisfy this requirement of Section 269, there are no grounds for a technical appeal. As Kimberly Clark Australia has put the case:

“The current legislative process affords aggrieved parties the ability to raise objections to the TMRO, who can request a reinvestigation. Once customs undertakes such a reinvestigation, should the determination change as has happened in the Toilet Paper case,

² AMWU, AWU, CFMEU, 'Issues Paper', *Anti-Dumping Roundtable*, 20/04/11, p 18, available online @

there is no formal process (to) enable the new aggrieved party to be represented in the change of finding. There is an option to pursue errors of law through the Federal Court, but this is limited and does not permit review of the merits of the finding. Some mechanism needs to be provided to enable representations outside a Federal Court appeal of errors of law.”³

25. Further, The Pulp and Paper Industry Strategy Group’s (PPISG) strategy presented to the government last year recommends:

- The formation of a working group with the Australian Customs and Border Protection Service (perhaps in conjunction with the Trade Remedies Task Force) It would consider how to streamline the process for making a case that dumping or unfair competition through subsidies is occurring in order to reduce costs and complexity for the industry.
- The Australian Customs and Border Protection would provide business with a clear definition of material injury in relation to dumping actions and remedies.
- The Productivity Commission’s draft recommendation to introduce a ‘public interest test’ would be rejected.
- The Productivity Commission’s draft recommendation on the continuation of measures would also be rejected.⁴

The CFMEU broadly supports the implementation of the PPISG’s recommendations.

Plywood

26. The Australian produced share of the plywood market contracted from 55% in 2000 to 36% in 2009, which is almost entirely attributable to increased imports from the recently

³ AMWU, AWU, CFMEU, ‘Maintaining and Improving the Integrity of Australia’s Anti-Dumping and Countervailing System’, *Joint Submission*, August 2010, p 27-28, available online @ <http://www.customs.gov.au/webdata/resources/files/SUB10-CFMEUAWUandAMWU.pdf>,

⁴ Pulp and Paper Industry Strategy Group, ‘Final Report,’ March 2010, p 100, available online @ http://www.innovation.gov.au/Industry/PulpandPaper/PPIIC/Documents/PPISG_FinalReportMarch2010.pdf ,

accused dumpers (as opposed to the other main importer, New Zealand) In this period (2001-2007) China increased production from approximately 1 million to 74 million cubic meters of panels (1/3 of total global demand). An anti-dumping application was made by the industry against imports from China, Malaysia, Chile and Brazil (REP 156) It was found that these imports contributed to reduced sales revenue, reduced sales volume, price suppression, reduced profit and profitability, reduced attractiveness to reinvest, deteriorating returns on investment and reduced employment. The application was ultimately rejected as dumped plywood from Brazil (8% dumping margin) and China (19.5% dumping margin) was determined to have not caused material injury, as injury was allegedly caused mainly from ‘undumped’ product imports including those from Chile and Malaysia and from the Global Financial Crisis.

27. It is the view of the applicant industry that product from Chile and Malaysia was determined as undumped erroneously due to a misplaced acceptance that transactions inclusive of inputs and finished product were made by suppliers and exporters in the ‘ordinary course of trade’ and the sales under question were consistent with ‘arm’s length transactions’, despite evidence to the contrary.
28. Evidence of possible unfair subsidisation utilised by producers in Chile and Malaysia, perhaps in order for them to compete with China and Brazil does not appear to have been adequately taken into account. Whether the products came from illegally logged timber was also not considered.

Structural Timber

29. The CFMEU has observed that some firms may not have submitted an application to have dumping or subsidisation remedied as they have low expectations of success and the information to initiate investigations may not be available. The structural timber producing industry is currently threatened by cheap imports, especially product from Continental and Eastern Europe, Russia and South America; evidence suggests they have recently increased market share at the expense of local industry, possibly through dumping/ and or subsidisation.

30. In their review of the system The Productivity Commission recommended ‘That the Australian Government should consult with the Australian Bureau of Statistics on the best way to ensure that import data are not suppressed on confidentiality grounds when the same or similar data can be publicly accessed through other sources’⁵ It is of considerable concern that the ABS has forwarded a submission arguing against the implementation of this recommendation.

31. If this recommendation was acted upon it could partly address some of the industry’s concerns with regard to obstacles in proving dumping Gunns Ltd, a major structural timber producer, put in a submission to the Productivity Commission’s inquiry which advocated amongst other things:

- That as required Customs, local industry organisations and Austrade jointly identifies key overseas markets of origin for specific imported goods, and publishes on their websites quarterly: the weighted average price for the like goods sold in the ordinary course of trade and at arm’s length transactions in the exporter’s own country.
- That the current data collection format and tariff codes are review(ed)(sic) by Customs in association with the relevant local industry organisations to ensure the codes are sufficiently specific to allow accurate and timely identification of like goods.
- That when an application for an anti-dumping action is requested, based on a reasonable presentation of local industry evidence, that a thorough audit over the past two years import activity (of the like goods) is undertaken by Customs, in consultation with the local industry body, making the request.⁶

32. Such administrative changes are necessary as it may prevent dumping from occurring without being detected or without it being able to be proved. Other aspects would need to be addressed to prevent dumping from occurring without remedy. These include

⁵ The Productivity Commission, ‘Recommendations’ *Australia’s Anti-Dumping System*, p XXXIV, available online @ http://www.pc.gov.au/_data/assets/pdf_file/0009/93753/03-recommendations.pdf

⁶ Gunns Ltd, ‘Submission’, Productivity Commission’s Inquiry into Australia’s Anti-Dumping and Countervailing System, http://www.pc.gov.au/_data/assets/pdf_file/0017/90026/sub008.pdf

overcoming the low expectations of success, by policy makers addressing and preventing opportunities for exporters and importers to obstruct and obfuscate by changing their practices, products and pricing just sufficiently to avoid the specific complaint ‘attaching’ to them.

The impact of cases of unfair subsidisation in exporting competitor countries on the Australian forest industry

33. One dumping enabler is state owned, linked or heavily subsidised enterprises selling below cost to producers (producers perhaps directly or indirectly affiliated with the state or co-owned) who in turn are able to export at a price below ‘normal value’ but it be concluded that the aforementioned transactions are ‘arm’s length’ and in the normal course of trade. This suggests that cases of subsidisation should be addressed separately from dumping in anti-dumping and countervailing investigations to ensure fairer trade. This separation occurs in other countries.
34. Australian forest product manufacturers face the situation of competing against firms which receive support through ‘free’ forestry concessions, other unfair subsidies including under national legislation and access to export finance facilitation at preferential rates through quasi-autonomous non-government financial institutions.

A robust anti-dumping and countervailing system as a safeguard to the protection of environmental standards and labour rights in Australia and competitor countries

35. The goal of the sustainable management of Australia’s forests represents a response inhibitor to Australian firms acting on dumping of forest products outside of the system of trade remedies legally available to it.
36. Expanding on this, the forest industry is vulnerable to the practices of intermittent dumping and/or predatory pricing as it is unable to respond to this due partly to the industry agreeing to processes which are designed to balance the social, economic and environmental impacts of its economic activity. Implicit in the agreements is the premise that a responsive anti-dumping and countervailing system be in place. A weak anti-dumping system could well cause the industry to look offshore rather than in Australia for

its future investments with associated ramifications. The reality of social commitments being response inhibitors to dumping is not exclusive to the forest and forest products industry and it is important that this issue is resolved in association with debates about climate change mitigation.

37. In light of this, this inquiry into the Australian forest industry needs to realize the important check and balance which a robust anti-dumping and countervailing system would potentially provide for the protection of labour rights and environmental values in exporting countries' respective forest industries. While anti-dumping measures may not directly prevent the abuse of human, social and labour rights and non-adherence to international environmental standards, they decrease the potential advantage that such violations give the firms that engage in such practices.
38. It is no secret that some corporations have benefited from the lower production costs that can be obtained through violations of core labour and environmental standards. Anti-dumping duties reduce any competitive advantage the offending firms may be able to gain by violations, such as advantages through the enabling of predatory pricing.
39. The main justification for the Federal Governments' support for an anti-dumping system is that:

'Anti-dumping legislation ensures that overseas exporters do not hurt our industry by selling their products in Australia at a lower price than they charge in their home market'⁷

Although it is not a surprise that this is the government's main justification, it also needs to be noted that the system compliments, if properly configured, other policy in regards to fairness in international trade including policies which aim to:

- Recognise that economic growth and prosperity arising from increased international trade brings with it the responsibility to promote higher labour and environmental standards for Australia and internationally.

⁷ ALP National Platform and Constitution, 2009, 'Securing our future with responsible economic management', Chapter 2 (Platform available online @: <http://www.alp.org.au/australian-labor/our-platform/>)

- Support greater cooperation between the secretariats of the WTO and the ILO on the issue of trade and labour standards.
- Support the incorporation of core labour standards in all international trade agreements.
- Commit to the goal of sustainable development.
- Work towards the removal of environmentally damaging subsidies, and promote mechanisms which can reconcile the interests of environmental protection and open markets.
- Note the important role and responsibility we have at the Asian Development Bank and supports the inclusion of core labour standards in ADB Decision-making including a role monitoring mechanism at the ADB.⁸

40. The insertion of labour clauses in existing multilateral, regional and bilateral ‘free trade agreements’ is an issue for Australia’s broader international trade negotiators, including this year’s planned bilateral trade negotiations with Indonesia and China. It is also pertinent to the Australian forest industry. In the mean time, the Australian government through its place on the WTO Rules Committee should propose the inclusion to the list of so called ‘actionable or prohibited subsidies’ unfair trade advantages such as:

- Any advantage from violations of human, social and/or labour rights (particularly non- adherence to the ILO’s fundamental rights at work)
- Non -adherence to basic environment standards

⁸ Ibid, (Platform available online @: <http://www.alp.org.au/australian-labor/our-platform/>)

41. Regardless of action to amend existing free trade agreements, Australia can act through a reconfiguring of its anti-dumping and countervailing system to better protect basic human rights and environmental standards by concurrently providing greater fortification for the Australian industry, and the workers, families and communities which depend on it.
42. Recently, Indonesia and China have allegedly threatened or indeed used WTO appeals processes in challenging the levying of anti-dumping remedies for industry. The ALP's platform suggests a preference for these appealable cases to the WTO secretariat also be heard concurrently by the ILO for a full analysis of any discrepancy between the production process and the ILO's fundamental rights at work framework. We submit that in considering cases appealed by the exporter to the WTO, the WTO must have an obligation to refer to the ILO in reviewing such an appeal with a mind to any unfair subsidization or unfair 'comparative cost advantaged' gained through illegal activity.
43. Punitive measures could be combined with capacity building to improve the situation in the exporting country (in some cases perhaps complementing Australian government policies to capacity build to prevent illegal logging, Reduce Emissions from Deforestation and Degradation (REDD) and promote sustainable development).

Conclusion

44. Aspects of the forest industry crisis are interlinked. For instance, resource constraints from a failure of land use policy have exacerbated the industry's response inhibitors when it is attacked through predatory pricing and cheap imports, in the absence of a robust anti-dumping system, putting at risk employment through value adding. This in turn affects industry policy and community outcomes. Meanwhile the prevalence of a weak anti-dumping and countervailing system effects investment and therefore resource security as a flow on.
45. The dumping of forest products is not only a threat to Australia's forest and forest products industry, the workers, families and communities which depend on it, but also to the entire economy. Australia needs forest products for its continued economic development. Any benefit for downstream consuming industries from the dumped products' lower price is by

definition temporary (especially if unsustainably produced as well as priced) Weak anti-dumping and countervailing laws thus sacrifice local industry as a consequence of material injury from the dumping and importation of subsidised forest products not being remedied despite the real likelihood of no lasting economy wide productivity dividends from ongoing availability of the lower prices.

46. Australia has an interest in ensuring that the forest products we use are being sustainably produced. The reason for this is:

- We should act as good international citizens and our procurement reflect this.
- A more likely long term outcome from exempting goods which are unsustainably produced and dumped or subsidised from duties (rather than long term efficiency gains) are long term efficiency detriments. This occurs due to the emergence of sectoral import dependence and/or potential monopoly situations. In turn, this will lead to higher prices being faced by downstream forest product consuming industries and consumers than would have occurred, if local industry avoided material injury from dumping and had the ability to apply ongoing local competition to imports.

47. The CFMEU is pleased to contribute to this inquiry and looks forward to opportunities to appear before the Committee.

APPENDIX⁹

FIGURE 1: TOTAL PLANTATION AREA BY TYPE, AUSTRALIA, 1995–2009

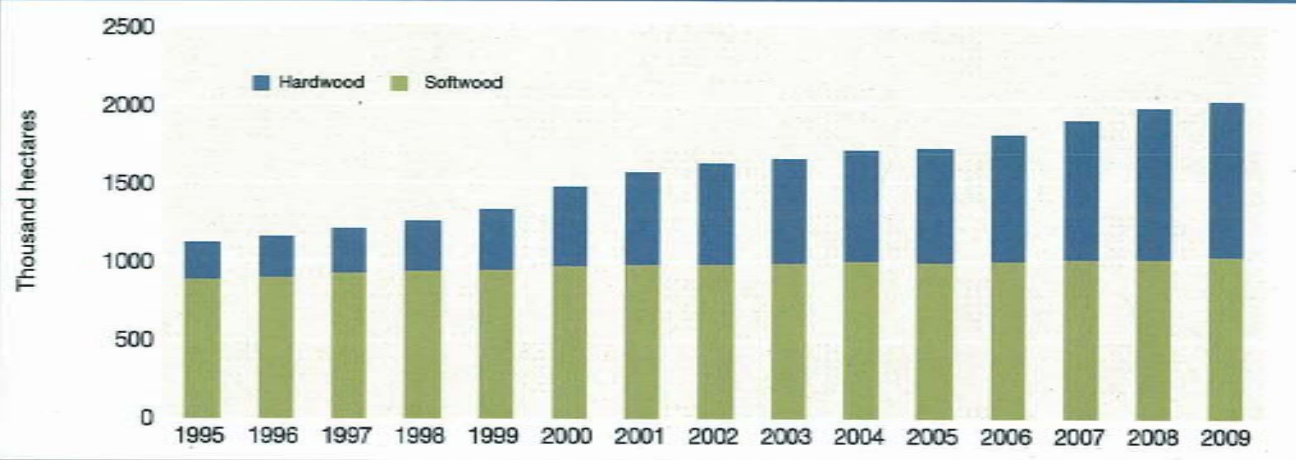
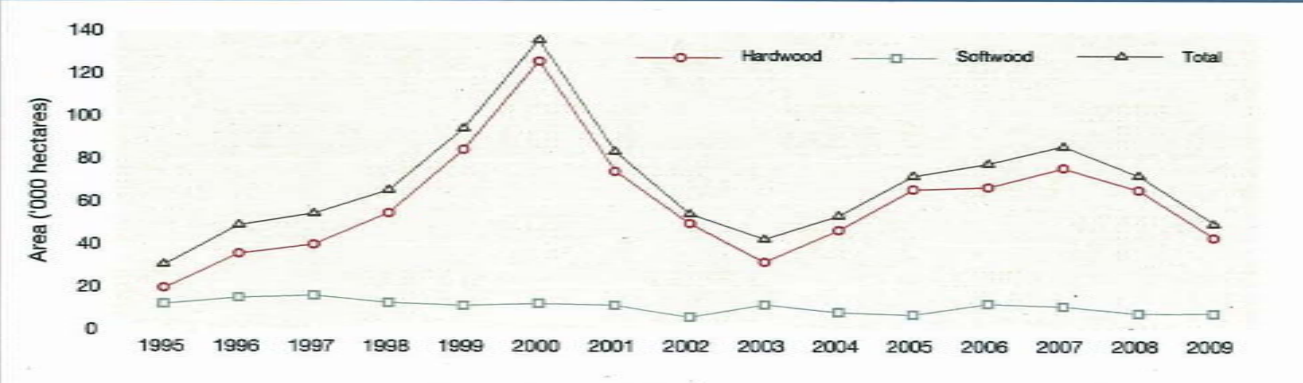


FIGURE 6: NEW AREAS PLANTED, 1995 TO 2009



⁹ DAFF, Australia's Plantations, 2010 Inventory Update, available online @:
http://adl.brs.gov.au/data/warehouse/pe_brs90000004201/NPIupdate2010_20100525_ap14.pdf