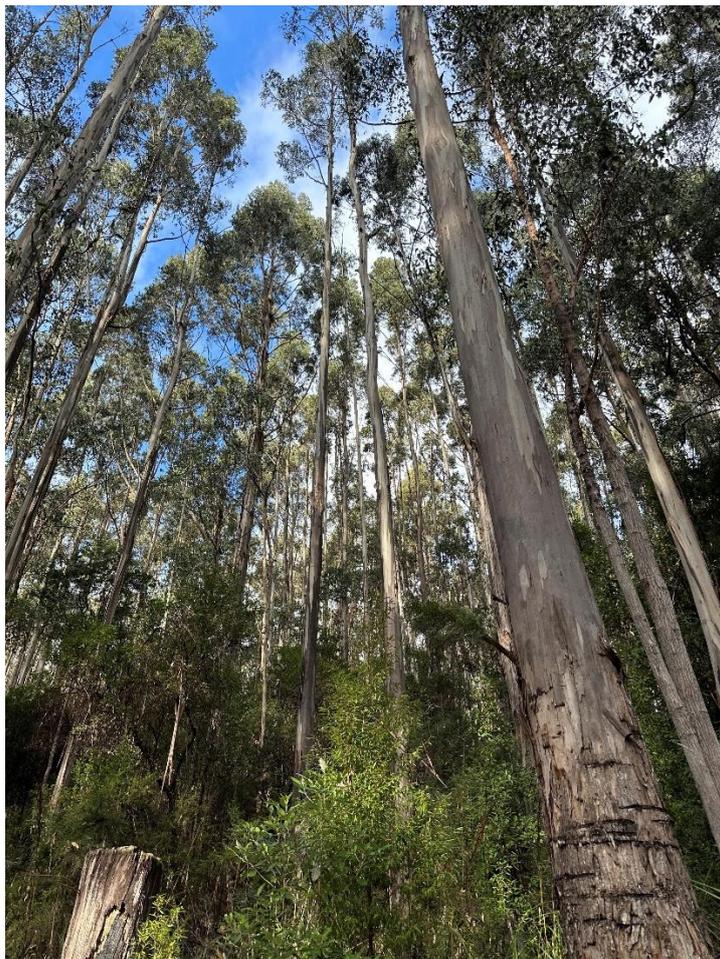


Independent Review of the Tasmanian RFA 2017-22

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Disclaimer

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Contents

Independent Review of the Tasmanian RFA 2017-22	i
Executive Summary	vi
List of Recommendations	1
Introduction	3
Purpose of the 5-yearly review	3
Context of the Tasmanian Regional Forest Agreement (RFA)	4
Tasmania’s Forest Management System: An Overview (2021)	7
State of the Forests Report (2016-21)	9
Recommendations from the Third RFA Review (2015)	10
Engagement with the Aboriginal Communities	10
Ecosystem monitoring and reporting	10
Resource Estimates	11
Review of the Outcomes Report (2017-22)	12
Professor Samuel’s Independent Review of the EPBC Act (2020)	15
State of the Environment Report 2024	17
Issues raised in Submissions and Consultations with the Independent Review	18
Conclusions & Recommendations	20
Evidence of RFA outcomes	20
Aboriginal Culture	21
Aboriginal Land	22
Workplace Culture	23
Contacting stakeholders	23
Compliance with Forest Practices Code	24
Utilisation & value of the resource	25
Harvesting contractors	25
Social licence	26
Conversion of Future Potential Production Forest (FPPF)	27
Speciality timbers	28
Other Issues raised in Submissions and Consultations	30
Native Forest Harvesting	30
Forestry Education	30
Management Plans	31
Certification	31
Setting the stage	31

Conclusion	33
Appendix A: Terms of Reference for the Independent Reviewer	34
Appendix B: List of Written Submissions.....	35
References	36

Tables

Table 1 Summary of original RFA Objectives	5
Table 2 Range of Viewpoints and Counterpoints encountered during consultations	18

Executive Summary

This independent review of the Tasmanian Regional Forest Agreement (RFA) 2017-22 drew upon the official Outcomes Report, plus 21 written submissions and 45 consultations, resulting in 11 recommendations (overleaf). It is apparent that the Tasmanian Community is deeply divided over the RFA, and there is an urgent need to strengthen social licence. In addition, there are two pressing matters, both of which are not strictly within the review period (2017-22) but are relevant as they are likely to impact the RFA in the near future. One arises from the proposed National Environmental Standards, which if delivered, will require immediate reform of the RFA framework. Another is that a major change in the timber harvest is envisaged in 2027 (with a major reduction in the native forest harvest, coupled with a corresponding increase in the plantation harvest) and appropriate measures need to be taken across the supply chain to prepare for this transition. Recommendations dealing with these matters need to be addressed urgently, so it is imperative that Recommendations 1 (statutory requirements), 8 (preparing for the harvest transition) and 9 (social licence) progress promptly.

List of Recommendations

The following 11 Recommendations are made:

Recommendation 1: The Tasmanian Government should require the Forest Practices Authority (FPA) to provide more measuring, monitoring, reporting of, and responding to key indicators of the forest environment, including biodiversity, cultural and socio-economic aspects; and should ensure that the FPA is adequately resourced and funded to provide useful insights with sufficient detail and frequency, to monitor environmental outcomes in all forest operations and ensure compliance with statutory requirements.

Recommendation 2: The Tasmanian Government should strengthen the Forest Practices Code (and its subordinate procedures) to better protect all forms of Aboriginal Heritage, in accordance with the wishes of the Aboriginal Communities.

Recommendation 3: The Tasmanian Government should progress the return of forested land to Aboriginal Communities and should place greater emphasis on the joint management of land dominated by native vegetation.

Recommendation 4: The Tasmanian Government should ensure that its Forestry agencies, including Sustainable Timber Tasmania and the Forest Practices Authority, commit to creating a workplace better able to attract employees with local knowledge of Aboriginal Heritage.

Recommendation 5: The Tasmanian Government should require that Sustainable Timber Tasmania periodically reviews procedures and refreshes contact details for contacting stakeholders to avoid miscommunication, to ensure that there is a suitable avenue for stakeholders to provide feedback, and that such feedback receives prompt and appropriate attention.

Recommendation 6: The Tasmanian Government should ensure best practice for endangered species by requiring the Forest Practices Authority to (a) ensure timeliness of updates to procedures (including the Threatened Species Adviser) to maintain current best practice, and (b) to monitor and report the longer-term outcomes of breaches of the Forest Practices Code.

Recommendation 7: The Tasmanian Government should require Sustainable Timber Tasmania to demonstrate that good value is recovered from forest operations, and to communicate this information transparently and publicly.

Recommendation 8: The Tasmanian Government should require Sustainable Timber Tasmania to urgently engage with industry to position all industry participants to re-equip for the post-2027 harvest in a timely and affordable manner.

Recommendation 9: The Tasmanian Government should require the Forest Practices Authority to work with the broader forestry community in Tasmania to devise and commit to a strategy to strengthen forestry's social licence to continue timber harvesting in both plantation and native forests.

Recommendation 10: The Tasmanian Government should conduct comprehensive biodiversity surveys before considering the conversion of any Future Potential Production Forest (FPPF) land to Permanent Timber Production Zone (PTPZ).

Recommendation 11: The Tasmanian Government should assist the Tasmanian Special Timbers Alliance to examine the viability of an independent agency to handle speciality timbers, including how it might function operationally in the field, and whether it could be financially viable.

Introduction

The Independent Review, a statutory requirement of the Tasmania Regional Forest Agreement (RFA) provides relevant Commonwealth and Tasmanian Ministers with insight into, and recommendations arising from the performance of the RFA during the period 2017-2022, based on a series of reports prepared by the Australian and Tasmanian governments (environmental and forest policy agencies in both the Australian and Tasmanian governments), as well as public submissions and consultations. The previous 5-yearly report, presented in 2015, dealt with the period 2007-12. There was no review during the period 2012-17, as the governments decided that 'consultation undertaken in late 2016 and the compilation of the State of the Forests Report 2017 to be sufficient' (RFA s.9AA). The present review considers the period 2017-22 and examines the uptake of recommendations by the previous (2007-12) review. This review forms part of the process that initiates a 5-year extension of the RFA.

Purpose of the 5-yearly review

The Tasmanian Regional Forest Agreement (RFA, s.9C & 9D) (DAFF 1997) and the Scoping Agreement (DAFF 2022) both state:

9C. The purpose of the 5 yearly review is to examine Tasmania's forest management and its Ecologically Sustainable Forest Management, through:

- a) *demonstrated* adaptive forest management in accordance with the RFA framework;
- b) *demonstrated* how the Parties have provided for the protection of Matters of National Environmental Significance, ..., which may be impacted by Forestry Operations;
- c) *demonstrated* how relevant Statutory Conservation Planning Documents have been implemented as part of the Forest Management System;
- d) *demonstrated* how social and economic benefits of forestry and other Forest uses are being achieved; and
- e) *assess* the extent to which key findings and/or recommendations for preceding 5 yearly reviews have been addressed.

9D. The Parties note that the State of the Forests Reports ... provide an ongoing mechanism to monitor ... key environmental, social and economic indicators ... a key source of information in the 5 yearly reviews under this Agreement.

The terms of reference for this review were to 'comment on the performance of the Tasmanian Regional Forest Agreement over the ... five years (2017-2022) and any specific recommendations with respect to the outcomes and objectives of the Tasmanian RFA, considering the written public submissions received' (Appendix 1.).

Context of the Tasmanian Regional Forest Agreement (RFA)

The Tasmanian RFA was signed by the Australian and Tasmanian Governments on 8 November 1997. The agreement was varied on 18 August 2017 to extend its life to 8 November 2037 and to establish five-yearly extensions contingent on satisfactory completion of five-yearly reviews.

Much has changed during the 27 years since the Tasmanian RFA was first signed, so it is appropriate to examine not only the specific outputs during 2017-22 reference period, but also to refer to the broader objectives of the RFA to better understand the context of the agreement. The Agreement was forged in conjunction with several other initiatives that remain relevant today and serve as a lens through which to evaluate performance.

- The Tasmanian Forests and Forest Industry Strategy (1990), specifically mentioned in the RFA, is now difficult to access. A summary in Options for the Tasmania-Commonwealth Regional Forest Agreement: a strategic approach (DAFF 1997) indicates that key objectives for the RFA were (inter alia): Protection of areas of highest conservation value; Supply targets for special timber species; and a Competitive market for Crown wood.
- The National Forest Policy Statement (DAFF 1995) sought to (inter alia): Retain the integrity and diversity of forests; Ensure a holistic approach to forest management; Foster sustainable forest-based industries founded on excellence and innovation; Ensure forest resources are used in an efficient, environmentally sensitive and sustainable manner; Respond to community concerns; and Ensure that the community has a sound understanding of forest management and participates in decision-making relating to forest management.
- The Plantations 2020 Vision (DAFF 2002) sought to (inter alia): Maximise the potential economic and environmental benefits of plantations through market development; Increase the farm forestry resource; and be Commercially-oriented, market-driven and market-focused in all operations.

Table 1 offers a concise checklist of these objectives. My original intention was to offer an additional column with indication of progress towards these objectives, but an early draft suggested this was counterproductive, as it did not succeed in its objective to stimulate constructive reflection of the best way forward. Instead, it revealed divisions amongst key stakeholders, highlighting the lack of a shared vision about achievements, expectations, deficiencies and solutions. This is an impediment for improvement, because efficient progress depends on recognising and acknowledging problems and potential solutions.

Table 1 Summary of original RFA Objectives

Document	Stated Objective
<i>Options for Tas-Commonwealth RFA</i>	Protection of areas of highest conservation value Supply targets for special timber species Competitive market for Crown wood
<i>National Forest Policy Statement</i>	Retain the integrity and diversity of forests Ensure a holistic approach to forest management Timber industry is sustainable, excellent & innovative Efficient, environmentally sensitive & sustainable Responsive to community concerns Community understanding of & participation in forest management
<i>Plantations 2020</i>	Maximise economic & environmental benefits of plantations Increase the farm forestry resource Commercially oriented, market-driven & market-focused
<i>Regional Forest Agreement 2017</i> (s.19) (s.29) (Attachment 10)	Implement Ecologically Sustainable Forest Management Maintaining a CAR Reserve System Internationally competitive wood production Promote conservation within the Private Forest Estate Protect Matters of National Environmental Significance Research, monitor, evaluate & communicate to support decision making Promote sustainable production of speciality timbers

The RFA was amended in 2017 with minor changes to reflect the extension of the agreement, but these amendments do not alter the overarching objectives. However, recent developments that may create new expectations for the management of Tasmania's forests include the Samuel Report on the Environmental Protection and Biodiversity Conservation (EPBC) Act, the Nature Positive Plan, and the State of the Environment Report, all of which will be addressed later. Ultimately the RFA should be aligned with any developments arising from these new initiatives, but some of the reports contributing to the RFA during 2017-22 could not have anticipated these most recent developments.

This review deals only with the Tasmanian RFA but would be incomplete without a scan of similar agreements in other States. It is noteworthy that Victoria (DEECA 2024) has recently terminated its agreements, and that Western Australia has ended commercial harvesting of native forests (WA Government 2024). An analysis of these recent developments in Victoria and WA is beyond the scope of this review, and while there may be several proximate reasons (e.g., environmental concerns including climate change), it is likely that the lack of social licence (Dare et al. 2014) is a major underlying factor that warrants consideration in this review.

Tasmania was used as a benchmark in a global study (McDermott et al. 2007) of policies relating to global forest practices in 2007 and ranked amongst the best in terms of prescriptive policies. Subsequent improvements to policies and legislation suggest that Tasmania likely remains amongst the best in the world in terms of policy documentation – but it is more challenging to assess the performance of these policies in ensuring best practice, and to judge how they are regarded by the broader community.

This review attracted 21 written submissions and involved 45 consultations, covering a wide range of sectors, affiliations and views. It is beyond the scope of this review to do justice to all the specific concerns raised, especially those regarding specific local issues, so this report concentrates on the systematic and procedural issues of State-wide relevance. Nonetheless, I thank the many informants who gave generously of their time to enlighten this review about the many issues and nuances relating to the RFA during the past several years.

Tasmania's Forest Management System: An Overview (2021)

Tasmania's Forest Management System: An Overview (DSG 2021) was first published in 2017 as part of the RFA extension process, and it was updated 31 December 2021. This overview outlines how legislation (specifically the Forest Practices Act) sets out how to 'achieve sustainable management of both crown and private forests to provide social, economic and environmental outcomes'. The Overview, and the legislation and procedures that it describes are commendable. However, on page 13, the Overview states the aim 'to foster co-operation and communication among all stakeholders, including the government, private landowners, the forest industry and the broader community with an emphasis on '...education and continuous improvement'. It is not evident that this has been achieved to the extent needed, as will become clear later in this report.

There is no doubt that there is excellent co-operation and continuous improvement with some stakeholders, but public consultations conducted during the present review reveal a deeply divided community, with strongly opposing views regarding forest management. This divide is not restricted to a handful of extremists, but is apparent more widely, including within the forestry sector. Experience elsewhere (notably in Victoria) suggests that a priority for a viable RFA is to secure and monitor forestry's social licence, and this pressing need is not reflected in the Overview. One goal of the stated aim 'to foster co-operation and communication among all stakeholders' should be to establish and secure social licence.

The Overview mentions that the *Forest Management Act 2013* (Tasmanian Government 2013) stipulates that Sustainable Timber Tasmania (STT) 'must make available ... a minimum... 137,000 cubic metres' of high-quality eucalypt sawlogs and veneer logs each year. During the review period this target has not been exceeded, but this requirement is problematic as it conflicts with RFA goals to be sustainable and market oriented. The well-established concept of sustained yield (Emmer & Sabornie 2014) involves establishing the maximum harvest that can be sustained in the long term, ensuring that the offtake achieved does not exceed this maximum, and maintaining the general condition of the forest. Furthermore, offering a wood supply greater than current demand discourages competition, innovation and competitive prices.

Another issue with the Overview is the superficial verification of yield forecasts. The Overview states

High-quality eucalypt sawlog yields are reviewed ... to confirm the sustainability of projected yields ... The most recent review ... confirmed STT's ability to make available 137,000 cubic metres per year of high-quality eucalypt sawlogs from the PTPZ or the next 90 years. STT monitors its annual wood product harvest against the predicted sustainable yield and reports these in their Annual Report.

Annual Reports enable readers to compare the actual harvest with the allowable harvest of 137,000 cubic metres of high-quality sawlogs, but given the latter is only a small proportion of the total harvest, this scarcely qualifies as useful monitoring. It is preferable to compare both the prediction and the harvest of each product on a coupe-by-coupe basis to give a stronger indication of the quality of resource estimates (Vanclay 1994). This may seem like an unnecessary detail, but unfortunately history has too many examples of forestry and fishery enterprises where an apparently

stable annual offtake suddenly plunged because of overconfidence in forecasts and a lack of reliable monitoring.

There also are several hyperlinks in the on-line version that require updating, a minor issue, but one suggestive of a lack of attention to potential users of the Overview.

State of the Forests Report (2016-21)

The State of the Forests Report (SoF) (FPA 2022a) is an illustrated summary of the more detailed State of the forests Tasmania 2022 data report (FPA 2023), a report to the Minister for Resources required by the *Forest Practices Act 1985*. Despite much comprehensive data, the SoF appears to overlook several key issues that could be monitored and reported in future editions of this report. However, the Scoping Agreement for this review states that the 'State of the Forests Report ... is not material for comment by the reviewer (noting that they have already been tabled in the Tasmanian Parliament)', so enhanced monitoring remains a matter for future such reports.

Although there has been much controversy about Swift Parrots (Webb et al. 2024) in recent years, the SoF makes no mention of the Swift Parrot, even though the accompanying SoF Data contains concerning information about this species.

The SoF mentions Aboriginal heritage (p.40), but during this review, consultations with the Aboriginal Communities indicated concern about a focus on heritage objects and a neglect for Sense of Place and Whole of Landscape values. Forestry agencies have mentioned their efforts to engage with Aboriginal Communities, but these differing perspectives reflect deficiencies in the engagement process and in the outcomes achieved.

The SoF contains few economic and social indicators about the forest or the timber harvest. The SoF omits any mention of the economic returns from forest harvesting, apart from a brief mention in the Section Volume and Value of Wood Production on page 28. Readers need to examine multiple pages of the STT Annual Report 2021-22 (STT 2022a) to find that the total income from forest products was \$94.6 million; minus \$60.7 million paid to harvesting and haulage contractors, so \$33.9 million net – for 1.39 million (tons or cubic metres) of wood – that's approximately \$24.39 per m³ (or ton) stumpage, which seems to be a rather modest return on harvesting. This estimate is obviously simplistic, but in the absence of transparent reporting, that becomes the best estimate available to the public. The PTPZ is public land; the public should benefit from and be aware of the value of the benefits from harvesting this public resource.

Recommendations from the Third RFA Review (2015)

The 2015 RFA Review (Kile 2015) (dealing with the period 2007-12) made 16 recommendations, most of which have been actioned, with satisfactory progress made (as noted in the Outcomes Report). However, there are five recommendations that warrant further attention. These are grouped into three categories to indicate where further attention is required.

Engagement with the Aboriginal Communities

4/2015: The Parties seek opportunities to encourage greater involvement of the Aboriginal Communities in management planning and forest stewardship during the RFA renewal/extension process.

The 2016 Joint Government Response (Commonwealth of Australia & State of Tasmania 2016) noted that:

- ‘... during the third 5-yearly review ... Submissions were sought from the Aboriginal community through advertising in the Koori Mail ...’,
- a new manual had been produced (Procedures for managing Aboriginal cultural heritage when preparing Forest Practices Plans (FPA 2017), and
- Forest Practices Officer training had commenced.

More recently, in 2021, STT began developing a Reconciliation Action Plan, but it is not yet publicly available. Worthy as these initiatives may be, they fall short of genuine engagement and involvement, notably by lacking any mechanisms for Aboriginal self-determination in data collection or mechanisms to ensure fair review, monitoring and implementation processes. The notion that meaningful engagement can be initiated through newspaper advertisements for written submissions is rather indicative of the problem.

15/2015: The State considers improved mechanisms for the protection of Aboriginal cultural heritage as part of the RFA renewal/extension.

The Tasmanian Government has recently called for submissions (Tasmanian Government 2024) concerning a new Aboriginal Cultural Heritage Protection Act. At this stage, it is unclear what the improved mechanisms may be, but consultation participants have expressed concern that cultural heritage assessments are focused on objects and tend to overlook other aspects such as Sense of Place and Whole-of-Landscape values.

Ecosystem monitoring and reporting

5/2015: The State builds on its existing monitoring framework to develop a long-term forest condition monitoring system across all forest tenures to assess changes in ecosystem health and vitality.

This recommendation arises from the 2015 Review under the section ‘3.2.3 Reserve Management’, which in turn refers to the 2007 Review and the need to ‘identify their Comprehensive, Adequate and Representative (CAR) values and the actions being taken in each reserve to appropriately manage those values’. The accompanying text clarifies that ‘[t]wo key areas include (1) condition of forest in reserves and the management of threats, risks and impacts and (2) the monitoring of the effectiveness of the reserve system in protecting biodiversity’. The Outcomes Report (below) documents that both these aspects have been addressed, and the Forest Practices Authority (FPA) monitors the effectiveness of their initiatives (Koch 2024) but the challenge to adequately protect biodiversity remains considerable. For instance, in 2020 in response to new information regarding the forage value of *E. brookeriana*, the FPA modified the management approach for Swift Parrots in the Eastern Tiers area – evidence of effective monitoring and adaptive management. However, the challenge to adequately manage for Swift Parrots remains, and it is vital that the FPA remains responsive to new data. Recent legal challenges (ABC News 2024) suggest that there is further room for improvement in monitoring and responding to new data, and this concern becomes evident again in the State of the Environment Report (see below) which reiterated the need to improve vegetation mapping and information.

6/2015: The Parties continue to improve the mechanisms in place to research, evaluate and communicate outcomes for the protection of threatened species and biodiversity across all forest tenures.

Although there are several good outputs associated with this recommendation, the status update is rather generic, referring to student projects and the Threatened Species Adviser (FPA 2025) software. One illustration of what appears to have been slow progress relates to the Swift Parrot that was listed as endangered (Threatened Species Section 2025) in 1992, and for which the 2011 recovery plan (revised in 2024) indicated that in Tasmania ‘implementation of prescriptions was often not effective in preserving habitat’ (Saunders 2011). This observation has the benefit of hindsight, but effective protection of threatened species requires agencies to be familiar with emerging threats and to be proactive in updating guidelines.

Resource Estimates

11/2015: The Parties continue to include regular reviews of the sustainable sawlog yield as an element of a renewed/extended RFA.

Resource estimates are based on optimising the high-quality sawlog, with all other products (ranging from woodchip to premium ‘speciality timber’) are treated as ‘arisings’. Because these various forest products vary greatly in both price and volume, the modelling system should be upgraded to take better account of species and products.

Review of the Outcomes Report (2017-22)

The Tasmanian Regional Forest Agreement Outcomes Report 2017–2022 (DNRE & DAFF 2024) indicates progress against five reporting criteria required in s.9C of the RFA:

- a) Demonstrate adaptive forest management in accordance with the RFA framework

There are many achievements contributing to this criterion outlined in pages 8-35 of the Outcomes Report, and Table 2 of that report summarises an impressive list of aspects for which research has led to improvements in practice. One challenge is that there are many flavours of adaptive management (Johnson 1999), and the RFA framework is broad, encompassing the need to provide certainty for conservation, for ecologically sustainable management of forests, for future growth of forest products industries, and for social values. At its simplest, adaptive management is the willingness, preparedness and agility to change course in response to changing circumstances, hence the Forest Products Authority deserves acknowledgement for their training program (e.g. adapting the Tasmanian forest practices system to climate change (Koch 2023)). It is evident that forest management in Tasmania can and has adapted to emerging ecological evidence, but it seems less agile in monitoring and responding to broader community concerns as required in s.9C(d) and s.91. For adaptive forest management to succeed long term, attention to social indicators is as important as the ecological and economic indicators, but this aspect appears to have been neglected somewhat during the review period – an unfortunate omission, given recent developments in Victoria.

- b) Demonstrate how the Parties have provided for the protection of Matters of National Environmental Significance (MNES), including trends and status of environmental values which may be impacted by Forestry Operations

The performance of the RFA in ensuring protection of MNES is problematic, with some informants arguing that the FPA maintains adequate oversight, and others drawing attention to serious lapses of performance. In particular, the Environmental Defenders Office (Environmental Defenders Office 2024) highlights the continuing decline in swift parrots as a failure of protecting MNES. As discussed below, the recent Samuel Report has also indicated that current provisions may not be adequate and has advocated for greater Federal involvement in such matters. In addition, during consultations for this review, members of the Aboriginal Communities have expressed concern that current procedures focus on objects, and neglect Sense of Place and Whole of Landscape values, indicating scope for further engagement with the Aboriginal Communities regarding culturally significant aspects, including big trees, special places, and landscape values.

- c) Demonstrate how relevant Statutory Conservation Planning Documents have been implemented as part of the Forest Management System

Table 7 of the Outcomes Report (DNRE & DAFF 2024) provides a list of 26 statutory conservation planning documents that have been updated during 2017-22 in response to new information and describes the implications for the forest management system. The FPA has also released a new version of the decision support tool, Threatened Species Adviser, that ensures staff have consistent access to the latest statutory and scientific information. At face value, this appears to be diligent progress to keep the system current and relevant, but the practical reality is a little more complex.

One of these updates concerned the Swift Parrot, and the FPA claims that in response to new sightings, each harvest operation in the vicinity was given case-specific consideration to achieve conservation outcomes. However, the Bob Brown Foundation succeeded with court action (Pulse Tasmania 2024) to halt operations in some coupes with Swift Parrots, indicating scope for improvement in some FPA processes and relationships. Ideally, species sightings would be reported directly to the FPA so that species records and management constraints could be promptly updated. This action highlights some challenges of management when goals are contested. For instance, the RFA objective to 'retain the integrity and diversity of forests' allows differing interpretations (e.g., the long-term objective may be to foster 'primeval forest', or pre-colonial forest, or biodiverse forest, all of which may require different management). Hence the need to build social licence and find common ground amongst stakeholders, before an informed assessment can be made of the utility of planning documents.

- d) Demonstrate how social and economic benefits of forestry and other forest uses are being achieved

This criterion is the most challenging of the five reporting criteria, as the official view presented in the report differs considerably from the views expressed by informants during consultations, indicative of the polarised views of forestry in the broader community. The extent of this polarity is a significant threat to the RFA (cf. Victoria), and its continuity likely depends on strengthening social licence through better communication of the potential sustainability and benefits of forest harvesting, and by demonstrating that these benefits are realised. The Outcomes Report indicated, as key metrics for this outcome, that the '... volume of timber produced from the public forest estate has been consistent over the 5 years of the reporting period, and the value of logs harvested from the estate has increased by 10.7%'. While this may be useful for the Treasury, it is not aligned with the expectations of the broader community, who may be seeking reassurance that this harvest from a public resource is a good investment both economically and socially (as well as being environmentally friendly).

The Blueprint Institute (Blueprint Institute 2021) argues that STT has made an operational loss exceeding \$7 million during 2017-23. Evidence provided in the Outcomes Report relating to financial performance is not sufficiently transparent to infer economic performance, and little monitoring of social outcomes has been reported. If the RFA is to secure support from the broader community and retain its social licence, it must develop better monitoring and communication of economic and social aspects.

Submissions and informants to this review were clearly polarised (especially concerning the support for, or criticism of native forest harvesting), and many documented real concerns. The process of building social licence will need to deal with these controversies, but in doing so, it offers a pathway to solutions that should be more durable and effective than a list of recommendations in an external review.

- e) Assess the extent to which key findings and/or recommendations from the preceding 5-yearly reviews have been addressed

Several relevant observations have been made in the above section 'Recommendations from the Third RFA Review (2015)', and only a few recommendations warrant further comment.

Recommendation 11/2015 (The parties continue to include regular reviews of the sustainable sawlog yield as an element of a renewed/extended Tasmanian Regional Forest Agreement): These reviews appear to deal primarily with high quality sawlog, whilst the rest of the harvest (notably speciality timber) appears to be neglected, and warrants greater attention. The speciality timber community expressed concern that the current practice of treating these species as ‘arisings’ would not lead to a sustainable harvest of these species.

The response to Recommendation 15/2015 stated that

efforts to develop contemporary legislative protection mechanisms ... failed to gain passage through both houses of the Tasmanian Parliament in 2013. The State, however, remains committed to ongoing dialogue ... the Aboriginal Heritage Council provides a formal mechanism for broad-based consultation.

Informants to the present review indicated that there is still an on-going need for better dialogue with the Aboriginal Communities. This matter is raised again in Recommendation 2 below.

Recommendation 16/2015 proposed ‘the simplification of a renewed/extended Tasmanian Regional Forest Agreement ... a greater emphasis on measuring and reporting outcomes’; and the Joint Government Response (in 2016) noted that ‘much of the current agreement contains commitments that have now been completed, are redundant or have been superseded’. The Agreement was varied in 2017, and while it still mentions a few matters that are completed, redundant or superseded, these are of little consequence. More importantly, while reporting has been improved, there appears a lack of emphasis on meaningful indicators that reveal the value of the forest harvest and the benefit to the Tasmanian Communities more broadly. This matter is raised again in Recommendation 1 below.

Professor Samuel's Independent Review of the EPBC Act (2020)

The Samuel review (Samuel 2020) of the Environmental Protection and Biodiversity Conservation (EPBC) Act in 2020 made several observations pertinent to this review. Under the EPBC Act, assessments and approvals are generally not required for forestry activities conducted in accordance with an RFA. Samuel noted that he has 'low confidence that the environmental considerations under the RFA Act are equivalent to those imposed by the EPBC Act' and noted that 'RFAs rely on the States to undertake monitoring, compliance and enforcement, with little Commonwealth oversight', concluding that '[t]here is insufficient Commonwealth oversight of RFAs and the assurance and reporting mechanisms are weak'.

Amongst the various weaknesses he observed, Samuel concluded that

the provisions for RFAs are the most unacceptable and require immediate reform. Specifically, RFAs should be required to demonstrate consistency with the National Environmental Standards and have greater Commonwealth oversight. ... In the immediate term, and as a condition of accreditation, States and Territories should ensure, and the Commonwealth expect, RFAs be consistent with National Environmental Standards. (noting that these standards (DCCEEW 2025) are yet to be finalised).

The Australian Government has responded to the Samuel Review with the Nature Positive Plan (DCCEEW 2022) which indicates an intention to apply the forthcoming National Environmental Standards (NES) to RFAs. Recommendation 15 of the Plan states:

Increase the level of environmental protection afforded in RFAs.

- a. The Commonwealth should immediately require, as a condition of any accredited arrangement, States to ensure that RFAs are consistent with the National Environmental Standards.
- b. In the second tranche of reform, the EPBC Act should be amended to replace the RFA 'exemption' with a requirement for accreditation against the National Environmental Standards, with the mandatory oversight of the Environment Assurance Commissioner.

One of the key benefits of the RFA was to exempt forestry operations within RFA Regions from the provisions of the EPBC Section 3, greatly streamlining forestry operations. However, the implicit *quid pro quo* is the expectation that the Forest Practices Authority (FPA) should ensure that all forestry operations attain a similar environmental standard as that expected by the EPBC (and potentially in due course, the NES). The Samuel Review considered the Commonwealth oversight of environmental protections under RFAs insufficient, that the National Environmental Standard for MNES (Matters of National Environmental Significance) should be applied immediately, and that RFAs should be subject to robust Commonwealth oversight.

The Outcomes Report (Table 7) has demonstrated how the FPA ensures that MNES are dealt with adequately and promptly and the Australian Government response to the Samuels Review indicates

a commitment to ensure that RFAs are consistent with the same level of protection that would be afforded under the reformed EPBC Act. Given the critical observations made in the Samuel Report, it remains important that the FPA ensures appropriate attention to MNES within the RFA framework.

State of the Environment Report 2024

The State of the Environment Report 2024 (TPC 2024) (SoE) made several recommendations relevant to this review. The SoE noted that monitoring of vegetation is inadequate to monitor trends and provide early warning of impending problems, highlighting the need to improve native vegetation mapping and information (SoE recommendation 8). The SoE noted the need to report on trends over time, to indicate future conditions and identify emerging issues, but also noted that it was becoming increasingly difficult to produce the report and observe trends due to challenges with obtaining and compiling the data. Hence there is a clear need for coordination in data collection for the SoE, the SoF and by the FPA to ensure provision of timely and detailed data to enable reliable monitoring. The SoE identified four problems:

- diverging forest extent data with changing mapping methodologies
- lack of contemporary data for private land
- changes to data collection methods hampering trend detection, and
- loss of corporate knowledge.

As the SoE stated, 'it is essential to address these data issues transparently and thoroughly to maintain credibility ...' (TPC 2024). These issues lead to Recommendation 1 (below) to improve measuring, monitoring, reporting and responses to key environmental indicators.

Issues raised in Submissions and Consultations with the Independent Review

A total of 21 written submissions (some with multiple attachments) were received, and 45 consultations (face to face, small group and teleconference) were conducted. Collectively, these contributions reflected a wide range of opinion, ranging from ‘as good as can be’ to ‘completely failed’ across a wide range of indicators (ranging from environmental to industry viewpoints). Many contributors offered specific examples (often illustrated with photographs) highlighting their concerns, but it was rarely possible to obtain independent verification. Since each respondent has their own view and expectations within this kaleidoscope of issues concerning the RFA, it is challenging to offer a meaningful and objective synthesis of perceived RFA outcomes.

Table 2 offers a highly simplified and condensed overview of the range of views held in the community that appear to underlie the opinions presented and aims to provide a context for the wide range of apparently contradictory views offered. There are other lenses that could be applied, but this table helps to demonstrate the contested spectrum and illustrate the challenge of attempting to focus these lenses, toward a common solution.

Table 2 Range of Viewpoints and Counterpoints encountered during consultations

Lens	Viewpoint	Counterpoint
<i>Wilderness</i>	Wilderness is precious and rare, so all remaining old growth should be protected as wilderness reserve.	Plants and animals co-evolved with megafauna for millions of years, and with Aboriginal burning for 35,000+ years, so primeval wilderness is an exception, not the norm.
<i>Tenure</i>	Forest land outside the existing reserve system is important for the survival of threatened species, so harvesting should cease, and the land should be added to National Parks or the World Heritage Area.	Suitability for plants and animals depends on habitat, not on tenure, so the real issue is not who manages, but how land is managed to maintain the desired habitat condition and extent. Active habitat management may be more feasible outside the Parks system.
<i>Carbon</i>	Forests hold and sequester large amounts of carbon, so should be protected to offset carbon emissions.	Trees live for hundreds of years, whereas fossil carbon remains secure for hundreds of millions of years. So it is better to cease mining fossil carbon than attempt to sequester fossil emissions in trees, especially if durable timber is used to displace steel and concrete in long-lasting buildings.
<i>Forest ecology</i>	Natural processes should prevail over human disturbance, so any timber harvesting should be highly selective with minimal disturbance - hence ‘tread lightly and widely’.	Ash (<i>E.regnans</i> , <i>E.obliqua</i> & <i>E.delegatensis</i>) forests regenerate best in large openings with an ash bed created by fire. An untimely fire when trees have no seed may led to the demise of the species locally, so a patchwork of different tree ages can mitigate risks.
<i>Timber harvesting</i>	Harvesting provides social benefits including carbon-friendly building materials, reduces pressure on vulnerable	Harvesting and regeneration is unsightly and has large impacts both on-site and downstream. More effort is needed to

Lens	Viewpoint	Counterpoint
	forests abroad, and may reduce wildfire risks by providing access and firebreaks.	minimise erosion and any unintended impact on fauna & flora, both terrestrial and aquatic.
<i>Socio- economics</i>	The timber industry creates employment in rural areas, with a multiplier effect that benefits the broader community. Special timbers are crafted into fine furniture and heritage boats, with high value-adding and maintaining traditional craftsmanship skills.	Typically, half the volume removed from the native forest is low-value woodchip for export. Plantations will soon provide similar products more consistently and at lower cost, so harvesting in old-growth forest should cease.
<i>Aboriginal heritage</i>	The Forest Management System protects Aboriginal heritage values, and all parties are committed to meaningful consultation.	Aboriginal People are under-represented in all matters relating to the RFA. Aboriginal culture, especially sense of place and whole of landscape values, are overlooked. There are too many reports of the destruction of Aboriginal heritage.

Table 2 illustrates the difficulty of synthesising insights from the submissions and consultations, as viewpoints vary greatly. Although there may be sound science underlying these views, these positions rely on value judgements regarding objectives (e.g., unmanaged wilderness versus deliberate management to create habitat for rare species).

It would be misleading to attempt to tabulate these views numerically, because the respondents are self-selected and do not reflect a statistical sample. However, Table 2 does illustrate that collectively, the participants reflected a broad spectrum of issues. It is likely that the views illustrated in Table 2 do not follow a normal curve (with the bulk of respondents holding a ‘middle-of-the-road’ view), but that participants were bimodal in their views, sharing little common ground. Such polarised views of forestry are problematic for ensuring wise forest management, and a similar polarisation is likely to have been a major contributor to the end of the RFAs in Victoria, again highlighting the need for building social licence. In an ideal situation with strong social licence, it would be possible to calmly discuss these views, and both find compromises in a ‘middle ground’ and identify the circumstances contributing to a more polarised view.

Government agencies commenting on this review have remarked that informants have not been identified, and that claims have not all been checked for accuracy – both these observations are correct and deliberate. Informants contributing to this review have not been identified because some requested that they remain anonymous, and I respect their request and hence deliberately avoided all attributions. And given that this review focuses on the period 2017-22, the passage of time means that it is rarely possible to verify claims. However, the management of a public resource such a forest requires more than simply following the guidelines; it requires a good outcome, and a disputed outcome warrants a resolution which may involve improved guidelines, improved practices, and greater engagement with the community. If forest management agencies do not have the support of the community, then achievements fall short of the RFA vision articulated in the National Forest Policy Statement (NFPS) to ensure that ‘Forest management is effective and responsive to the community’ and that ‘The Australian community will have a sound understanding of the values of forests and sustainable forest management, and will participate in decision-making processes relating to forest use and management’. It is unreasonable to expect full support from everyone, but the NFPS aims for responsive management, and a community that understands and participates – something that should be attainable and is worth attaining.

Conclusions & Recommendations

Table 2 above illustrates the diverse views held by informants, a microcosm of the broader community. The RFA faces a major challenge as it cannot satisfy all these diverse expectations, and a major effort is needed to engage with the broader community to contribute to a more informed discussion of forest management. The best way to improve the prognosis for the RFA is to build social licence by engaging with the broader community, by sharing information more transparently, and by working together to find practical compromises.

Previous independent reviews appear to have created an expectation for a long list of simple adjustments offering a straightforward path to an automatic extension... Whilst there are many small adjustments that could be made, they are not the main issue to be addressed. The critical issue for the RFA is the lack of social licence, which places the RFA at risk irrespective of any small adjustments that could be offered. Conversely, if there is a commitment to work with the broader community to strengthen social licence, that process will unveil many improvements that should be made. Whilst suggestions could be made as part of this review, it is preferable and more effective for improvements to current practice to be developed collaboratively through community consultation as part of building social licence. Hence, I offer a rather short list of recommendations dealing with urgent matters and am hopeful that my recommendation 9 (below) will lead to a serious and productive effort to build social licence and improve forest management for all Tasmanians.

Evidence of RFA outcomes

Many informants expressed the view that the RFA has worked rather well within the plantation sector, but that it has failed to meet expectations in native forests, failing on multiple indicators, especially relating to old-growth forests. Those with close experience of the RFA considered that the RFA provided a systematic framework for informed decisions, with scope for continual improvement, and helped to reduce short-term political expediency. However, there was general consensus that there was insufficient measuring, monitoring, reporting and responding, regarding many aspects within the RFA, but especially the socio-economic aspects. One of the STT's six core objectives (STT 2025) is to 'balance the need for wood resources with environmental, cultural and economic values' but there is little evidence that these are measured, monitored or reported. Section 62 of the RFA states that the desired forest management '... requires a long-term commitment to continuous improvement ...provide for social and economic benefit ... capable of responding to new information' – but the Outcomes Report provides little detail about continuous improvement on the basis of new social and economic information.

The recent Samuel Review considered that that the RFA should comply with National Environmental Standards (NES) and should be subject to greater Commonwealth oversight. This proposal harks back to the pre-RFA situation, and it seems preferable to demonstrate that any future NES can be achieved within State-based agencies. These concerns indicate a need to strengthen the Forest Practices Authority (FPA) and broaden its mandate (consistent with RFA Attachment 10, s.10 'to adequately resource the system surrounding the Forest Practices Code'), so that Tasmania can demonstrate sustainable environmental outcomes (consistent with any future NES) without Commonwealth intervention. Since much of the work of the FPA (Munks et al. 2020) is done by

Forest Practice Officers (FPOs, who may be independent consultants or employees within the timber industry), this may also require reassessment of training, certification and supervision of these FPOs. One issue is that many FPOs certify the work of their employer, creating a potential conflict of interest (and the possibility of a perceived conflict of interest). The FPO Manual (FPA 2022b) clearly states that

The FPO should ensure that their employer or client understands that FPOs have statutory responsibilities under the Act, and that the effective functioning of the forest practices system requires that FPOs actions are consistent with the Act and any FPA directions. The FPO Code of Conduct gives guidance on how these issues are to be handled. Instances of FPOs not correctly exercising their responsibilities under the Act may be dealt with by disciplinary action.

In addition, the Supreme and High Courts dismissed a case (Holmes 2024) claiming apprehended bias by an FPO, a further indication of standards applied by the FPA and the FPOs. Procedures for compliance audits (FPA 2022c) and investigations (FPA 2024) are well documented, and the 2022-23 Annual Report records one instance of disciplinary action against an FPO, evidence that compliance is taken seriously.

The RFA s.9C(d) requires this review to examine whether forest management systems ‘demonstrate how social and economic benefits of forestry and other forest uses are being achieved’. Unfortunately, financial data provided are not sufficiently transparent to infer economic performance, and minimal monitoring of social outcomes is available. If the RFA is to secure support from the broader community and retain its social licence, better monitoring and reporting of economic, environmental and social aspects need to be made available. It would appear that the FPA should be the relevant agency, because the Forest Practices Act (Tasmanian Government 1985) stipulates ‘an emphasis on research, review and continuing improvement’ (Schedule 7(ea)) and requires an account of ‘social, economic and environmental outcomes’ (s.4B(2)c). The FPA and Department of Natural Resources and Environment (NRE) have Agreed Procedures (FPA & DNRET 2024) for the management of protected species, but there is no evidence of comparable agreements for other RFA matters that potentially involve multiple government agencies (such as social and economic matters), so it seems appropriate that the FPA should coordinate or initiate sufficient monitoring and synthesis to provide more comprehensive insights into forest condition.

Recommendation 1

The Tasmanian Government should require the Forest Practices Authority (FPA) to provide more measuring, monitoring, reporting of, and responding to key indicators of the forest environment, including biodiversity, cultural and socio-economic aspects; and should ensure that the FPA is adequately resourced and funded to provide useful insights with sufficient detail and frequency, to monitor environmental outcomes in all forest operations and ensure compliance with statutory requirements.

Aboriginal Culture

Attachment 10 to the RFA indicates an intention to develop ‘new legislation in relation to Aboriginal cultural heritage to replace the Aboriginal Relics Act 1975’, but this has not materialised. RFA s.83A commits to ‘meaningful consultation on forest management with the Aboriginal ... community in

relation to protection of significant sites and places’, but there is little evidence that this has been achieved in any sustained way. Several informants from the Aboriginal Communities expressed concern about the lack of engagement, the lack of respect for significant sites (DCCEEW 2021), and the destruction of heritage (e.g., destruction of rock shelters, and artefacts found in ashes after regeneration burns). Several reviews (AHT 2023) of the Aboriginal Heritage Act 1975 (Aboriginal Heritage Tasmania 2023) have advocated major changes, but new legislation (DPIPWE 2021) appears to have been a low priority for successive Tasmanian Parliaments. The Aboriginal Heritage Act requires that all Aboriginal relics are protected, and under this framework, the Forest Practices Code has procedures (FPA 2017) that should protect culture and heritage in production forests. These procedures state that ‘the FPO will ensure that cultural heritage values are identified ... [through] consultation with local Aboriginal communities’, but informants indicate that this approach has been less than satisfactory. There was also concern that legislation and procedures are focused on relics as objects, not on broader cultural aspects such as Sense-of-Place and Whole-of-Landscape values that have great importance for the Aboriginal Communities. The proposed new Aboriginal Cultural Heritage legislation should be implemented, and the Forest Practices Code (FPC) (FPA 2020) amended to ensure better respect for, and protection of, Aboriginal Culture of all forms.

Recommendation 2

The Tasmanian Government should strengthen the Forest Practices Code (and its subordinate procedures) to better protect all forms of Aboriginal Heritage, in accordance with the wishes of the Aboriginal Communities.

Aboriginal Land

The return of land to Aboriginal People remains an important way to progress reconciliation in Tasmania. In 2018 the Tasmanian Government initiated a discussion paper regarding the return of land to the Aboriginal Communities (Department of Communities Tasmania, 2018 n.d.), leading to a series of reports (Tasmanian Government 2022) that appear to have been quietly shelved (Ashleigh Barraclough 2024). Forest land is of particular interest to Aboriginal Communities as it bears fewer scars of the colonial past, so the return of native forest land (land with particular significance to Aboriginal Communities, as well as land less critical for wood production) would be a significant step towards reconciliation with Aboriginal People. With open eucalypt forests, shared management may deliver additional benefits for flora and fauna - just as private conservation initiatives usefully complement the National Parks approach, Aboriginal management of native forest will add diversity - as well as help maintain a long tradition of cultural land management (McIntoch 2022). Tasmania’s forests evolved with over 40,000 years of cultural burning (Onfray 2012), so it is likely that much of what we now regard as natural forest is in fact a colonial artefact that would benefit from a revival of Aboriginal management. And in the tall ash forests, Aboriginal involvement will help to secure places of cultural significance. This can be achieved through the return of land, and through joint management of land (consistent with Pathway to Truth-telling and Treaty (Warner et al. 2021), Recommendation 15; and with Resetting the Relationship (Tasmanian Government 2020), Key Priority 4).

Recommendation 3

The Tasmanian Government should progress the return of forested land to Aboriginal Communities, and should place greater emphasis on the joint management of land dominated by native vegetation.

Workplace Culture

Informants were asked what incentives and support might encourage more Aboriginal People to consider working in STT or the FPA to secure better protection of Cultural Heritage in native forests, and a common response was to counter ‘why would anyone want to work there?’. This response reflects poorly on all forestry agencies and suggests the need for a better workplace culture (consistent with RFA s.74(a)), for better communication in the broader community about the objectives and conduct of forest management, and for forestry agencies to pay more attention and respect to the knowledge and wishes of Aboriginal Communities. STT might like to lead by example and appoint an Aboriginal person to their Board or foster an Aboriginal forestry enterprise (cf. the Land and Sea Aboriginal Corporation that has an abalone fishery (FRDC 2022)). Quite apart from the benefits of diversity and inclusion in the workplace, it is highly desirable that harvest planning involves input from local Aboriginal Communities to ensure adequate protection of Aboriginal Heritage, especially aspects such as Sense of Place and Whole-of-Landscape values.

Recommendation 4

The Tasmanian Government should ensure that its Forestry agencies, including Sustainable Timber Tasmania and the Forest Practices Authority, commit to creating a workplace better able to attract employees with local regional knowledge of Aboriginal Heritage.

Contacting stakeholders

Informants who participated in this review had diverse backgrounds and employment experience, so it is noteworthy that complaints about stakeholder issues concerned only STT’s native forest operations, and not private or plantation forestry. STT appears to have good policies (STT 2023), protocols (Private Forests Tasmania n.d.) and procedures (STT 2018) regarding stakeholders, but several informants who claimed to be STT-registered stakeholders complained that they had not been informed about recent forest operations near to their residence. This apparent lapse in communication warrants investigation, as timely information helps foster neighbourly relationships. Some informants also mentioned that they were disappointed that they were not advised by STT about this review – while it is not strictly an STT responsibility to publicise the RFA review, assisting in the dissemination of this information would reflect on their commitment to the community more broadly.

Recommendation 5

The Tasmanian Government should require that Sustainable Timber Tasmania periodically reviews procedures and refreshes contact details for contacting stakeholders to avoid miscommunication, to ensure that there is a suitable avenue for stakeholders to provide feedback, and that such feedback receives prompt and appropriate attention.

Compliance with Forest Practices Code

Several informants expressed concern surrounding the Forest Practices Code, mainly regarding logging coupes, penalties, and endangered species.

Logging coupes: Several informants expressed concern about the design of logging coupes and the conduct of harvesting. These concerns spanned a wide range of issues, including the size, shape (contributing to large edge effects), placement in the landscape (both with respect to hydrological effects and to visual impacts seen from afar), and attention to Aboriginal Cultural Heritage. The FPC outlines best practice for coupe design, so these concerns appear to reflect implementation and supervision, rather than policy. There may be two aspects at play: where good silvicultural practice may temporarily appear messy (where education may have a role to play), or where non-compliant harvesting is creating a problem that needs to be rectified. The concerns raised have not been investigated in the field during the review, but they nonetheless reflect on the importance of supervision by the FPA (as emphasised in Recommendation 1 above), and on the quality of information provided to stakeholders (Recommendation 5 above).

Breaches of the Code: Several informants remarked that penalties for violations of the Forest Practices Code were too lenient, and (especially in cases of illegal land clearing), were seen merely as the cost of doing business. The FPA's Investigation and Enforcement Protocols (FPA 2023) outline how the FPA first seeks to encourage compliance (Section 41(1) of the Forest Practices Act), or may issue a binding directive (s.41(2)) to repair or make good any damage, or may prescribe fines (s.47B) of up to 1000 penalty units (Department of Justice 2025), or in the case of particularly serious or wilful breaches, may refer a person to the Courts for prosecution (s.47 of the Act). The examples mentioned by informants lacked sufficient detail for further investigation, and the FPA's protocols seem appropriate, so the issue seems to be whether a supportive response by the FPA leads to better environmental outcomes in the longer term than a 'big stick' approach (Foulon et al. 2002) – it would be useful if the FPA monitored this.

Endangered species: Several informants raised concerns about the impact of timber harvesting on endangered species, especially the critically endangered swift parrot. Current estimates (Owens et al. 2023) suggest that the present population of about 750 swift parrots may diminish to fewer than 100 within a decade, largely due to predation by sugar/Kreff's gliders (TSSC 2016), coupled with the loss of breeding habitat (Webb et al., 2024). A recent review (Webb et al., 2019) concluded

current regulatory arrangements in which timber harvest plans are developed is largely in the hands of a state-owned forestry business and not subject to public review. If habitat loss continues, it will be for socioeconomic reasons, not uncertainty about the species' requirements. ... essential that clear cost-benefit analyses can be undertaken to shed light on the economic realities following a logical decision pathway, decision makers should ... maximise available breeding habitat.

The Bob Brown Foundation recently published (Gros et al. 2023) the reference codes of a series of logging coupes (SH050B, SH057A, etc.) that it alleges were harvested despite the presence of swift parrots. These allegations were raised with the FPA, who responded that '... prescriptions applied were in accordance with the current agreed management approach ... Additional retention ... in consultation with FPA ecologists ... adequately mitigated the risk by avoiding harvesting of SP habitat'. It is no longer possible to verify the field situation, but the case is indicative of the passion of

many NGOs, and the need for the FPA to maintain best practice. swift parrots vary nesting sites in concert with flowering patterns (DCCEW 2024), and it has been suggested that seasonal variation in flowering during last nesting season may have contributed to the situation where swift parrots may have been observed near harvesting operations. The veracity of this suggestion cannot be verified, but if correct, highlights the need for pro-active monitoring and prompt updates to FPA records.

It is noteworthy that wedge-tailed eagles were on the agenda in 2016, and that FPA procedures appear to alleviate those concerns during the current review period (2017-22).

Recommendation 6

The Tasmanian Government should ensure best practice for endangered species by requiring the Forest Practices Authority to (a) ensure timeliness of updates to procedures (including the Threatened Species Adviser) to maintain current best practice, and (b) to monitor and report the longer-term outcomes of breaches of the Forest Practices Code.

Utilisation & value of the resource

Many informants complained about the large amount of wood left in coupes, the large proportion of woodchips in the harvest, and the seemingly low financial rewards, arguing that wise use of this unique resource should attain better utilisation. The STT Annual Report reveals that in 2021-22, over 65% (by volume or mass) of the native forest harvest was woodchip (Tasmanian Timber, n.d.). The value of the various products harvested is not disclosed, but some simple calculations (based on the 2021-22 STT Annual Report: Total revenue from sale of forest products \$94.6m, minus payments to haulage contractors \$60.7m, divided by total production 1.39m) reveal that the price at stump, averaged across all products and sites harvested in 2021-22, was about \$24 per tonne, for a harvest comprising about 50% woodchip, a figure consistent with ranges indicated in the Private Forests Tasmania (PFT) Timber Market Tracker, but rather a rather low estimate for stumpage value. Recent news items reporting on the transport of sawlogs by ferry to Victoria (Colvin 2024) are also indicative of a disparity in log prices between States. STT should note these concerns, seek to continually improve their recovery of high-quality products from felled trees (and of all saleable material), and should be more transparent in reporting the value (both the stumpage and the value-adding within Tasmania) of its forest products, consistent with RFA s.9C(d).

Recommendation 7

The Tasmanian Government should require Sustainable Timber Tasmania to demonstrate that good value is recovered from forest operations, and to communicate this information transparently and publicly.

Harvesting contractors

A number of informants within the industry commented on the challenges facing transport and other contractors in the industry, especially as the transition (STT 2022b) to regrowth and plantation harvesting approaches (when the harvest of high-quality native sawlogs is projected to drop from 137,000 to 58,000 m³). Efficient handling of the new resource requires different equipment (for harvesting, haulage, etc), but perceptions about resource insecurity, coupled with the short-term

contracts on offer, make it difficult for contractors to secure finance for new equipment. Contractors are faced with the tough decision to find and secure finance to retool in a challenging environment, or to switch to fly-in fly-out employment offered by the mining industry – a decision with major consequences for their family, their community, and for the industry. Unless the government is prepared to assist with finance for retooling, contracts will need to offer sufficient duration and security to enable contractors to arrange finance on reasonable terms. Inappropriate equipment contributes to higher costs, greater risks (to the safety of both contractor and public road users) and greater environmental impacts, so it is in the public interest to ensure contractors have timely advice about the resource, and suitable terms to secure finance for new equipment (consistent with RFA Attachment 12 s.19). Whilst harvesting and haulage contractors may be the first to face these impacts, it is likely that the whole supply chain may be impacted and should be informed.

Recommendation 8

The Tasmanian Government should require Sustainable Timber Tasmania to urgently engage with industry to position all industry participants to re-equip for the post-2027 harvest in a timely and affordable manner.

Social licence

The National Forest Policy Statement (1992 & 1995), one of the foundational documents leading to the RFA, contains two objectives pertinent to this Review: to Respond to community concerns, and *Ensure* that the community has a sound understanding of forest management and participates in decision-making relating to forest management. Despite the passage of almost 30 years, the need for such responses, understanding and participation is probably greater now than it was when that Policy Statement was drafted – but increasingly, forest services are choosing to become ‘small targets’ and withdraw from community engagement. This will inevitably lead to a gradual erosion of social licence and lead to greater dissatisfaction with forestry operations, with an inevitable conclusion.

Wise forest management should invite a range of ecosystem managers to engage in the debate about responsible land use, and examine the science of, and advocacy for alternative approaches. Finding data to support a particular view is advocacy; searching for data that refutes those views is scientific – and ideally, the science is accepted only when many searches for exceptions are unsuccessful. The classic example of this relates to swans: it had long been reasonable for Europeans to argue that ‘all swans are white’, at least since Roman times, and it was only in 1697 when the Dutch navigator de Vlamingh found black swans in the Swan River that science refuted this claim. Unfortunately, with the current ‘publish or perish’ paradigm (Tran 2024), much advocacy masquerades as science (Lackey 2007), and should be tested more rigorously, especially in the field of conservation.

A current paradigm in Australian conservation is the importance of National Parks, but the reality is that fauna and flora depend on habitat, not on tenure. Prior to the arrival of Europeans, much of the land in Tasmania was managed by Aboriginal People (with cultural burning and other caring for country techniques), so many of our present National Parks reflect colonial artefacts. The concept of unmanaged National Parks is largely a British colonial construct, present in most former British colonies, but is less prevalent in continental Europe. So the challenge for Australian conservation is to

focus more on the habitats (and connectivity) required, and how to maintain these – and in some cases, timber harvesting may form part of the process of creating and maintaining the desired habitat.

Recently, the Blueprint Institute advocated a switch from timber harvesting to carbon storage in Tasmanian native forests (Blueprint Institute 2023); whilst simultaneously, Director General of the International Institute for applied Systems Analysis (IIASA), Hans Schellnhuber, advocated that using more wood, and less steel and concrete, is the best possible action we can take to mitigate climate change (PIK 2021). These propositions are contradictory, so the stage is set for some fertile debate. Engaging in this debate is central to the future of the native forest harvest in Tasmania, and it is essential to the future of the industry that the FPA and other interested parties collaborate to improve the social licence for timber harvesting to continue in public forests.

Recommendation 9

The Tasmanian Government should require the Forest Practices Authority to work with the broader forestry community in Tasmania to devise and commit to a strategy to strengthen forestry's social licence to continue timber harvesting in both plantation and native forests.

Conversion of Future Potential Production Forest (FPPF)

Strictly speaking, the issue of FPPF lies outside the scope of this review (the performance of the RFA during 2017-22), since the *Forestry (Rebuilding the Forest Industry) Act 2014* commenced in 2014, and had few implications until 2024 when the Tasmanian Government sought to convert (EDO 2024) FPPF land to Permanent Timber Production Zone (PTPZ) – but it impinges on many aspects of this review. This current effort to convert FPPF to PTPZ aims to increase the timber harvest by 10% without industry consultation, and in doing so, is likely to reignite old controversies (Holmes & Langenberg 2024), as it will hinder attempts to strengthen social licence (Recommendation 9), and may create problems with statutory requirements (Recommendation 1). It may also create difficulties with forest certification. It is unclear whether this conversion of FPPF will deliver any tangible benefit to the industry, and any potential benefit is likely to be short-lived (because of disruptions to harvests, and loss of social licence) - but it is clear that it has the potential to create many problems. If it is intended to proceed with this change of tenure (which will require approval from both houses of parliament), it would seem desirable to commence with biodiversity surveys to ascertain both the environmental values and the potential timber harvest available under the Forest Practices Code.

Recommendation 10

The Tasmanian Government should conduct comprehensive biodiversity surveys within Future Potential Production Forest (FPPF) before considering the conversion of any FPPF land to Permanent Timber Production Zone (PTPZ).

Speciality timbers

The RFA s.78A acknowledges the ‘particular importance of Special Species Timber for the Tasmanian Special Species Timbers sector including primary and secondary processors, retail and tourism’. Attachment 10 to the RFA seeks ‘to promote the sustainable production of long-rotation speciality timbers’, but there is little evidence that this has been pursued, as speciality timbers are regarded by STT as ‘arisings’ (cf. by-catch) that happen to become available when ‘high quality sawlogs’ (i.e., large logs of ash-type eucalypts) are harvested. This practice will mean that the supply of speciality timbers will diminish further with the anticipated change to regrowth harvesting in 2027. It is not merely an issue of the supply of speciality timber, but also an issue of tree maturity – harvesting speciality species as a by-product of sawlog operations will generally involve immature trees with small dimensions and with detrimental implications for the regeneration of these species. Where speciality species are present, it would be preferable to manage primarily for these, modifying any harvest of eucalypts to maintain suitable conditions for future growth of speciality species.

Submissions and informants to this Review expressed frustration about the lack of emphasis placed on specialty timbers and also expressed concern about the management of the Wooden Boat Board Bank (Island Specialty Timbers, n.d.). They also observed that most of the attention is given to blackwood, to the detriment of more valuable species such as Tasmania’s unique native conifers. It seems clear that the RFA is not serving the specialty timbers industry and craftspeople as intended, and that high value-adding is not fully appreciated. Written submission 23 by the Tasmanian Special Timbers Alliance offered six recommendations:

- 1) Develop a new overarching special species timber strategy.
- 2) Implement a formal zoning of areas rich in special species within land tenures to which the Special Species Management Plan (DSG 2017) (SSMP) applies to provide resource security.
- 3) Review the legislative and administrative barriers to accessing special species timber.
- 4) Establish a clear policy on the utilisation of Huon Pine, particularly in relation to remote areas.
- 5) Investigate the creation of an independent Special Timbers Authority.
- 6) Audit the Wooden Boat Board Bank to ensure it meets industry needs and operates as intended by the RFA.

Given the concern about the long-term viability of speciality timbers under present arrangements, it seems appropriate to consider alternative ways to handle these speciality timbers. One option is to create a new independent authority (as advocated above by the Tasmanian Special Timbers Alliance), or to assist an Aboriginal enterprise to take on this role (such as the abalone fishery operated by the Land and Sea Aboriginal Corporation (Coulter 2023)). An efficient approach may be to assist the Tasmanian Special Timbers Alliance to expand on their submission (Written submission 41) to formulate a concrete proposal, as a first step to satisfy RFA s.78A in promoting the ‘Tasmanian Special Species Timbers sector including primary and secondary processors, retail and tourism’.

Recommendation 11

The Tasmanian Government should assist the Tasmanian Special Timbers Alliance to examine the viability of an independent agency to handle speciality timbers, including how it might function operationally in the field, and whether it could be financially viable.

Other Issues raised in Submissions and Consultations

Several other issues raised by informants warrant further mention but are less amenable to a clear recommendation.

Native Forest Harvesting

A number of informants advocated for an end to all native forest harvesting, but this is inconsistent with RFA objectives and assumes that passive preservation is the best way to provide the desired range of habitats, a position contradicted by other informants. Tasmania's flora and fauna evolved with disturbance (mega-years of megafauna browsing, thousands of years of cultural burning), so some primeval forest may be a colonial artefact. The ash-type eucalypts (*E.regnans*, *E.obliqua* & *E.delegatensis*) are both fire-dependent and fire-susceptible, depending on fire to regenerate (Ferguson 2009), and at risk of elimination if the fire interval is too frequent (in regrowth too young to set seed, e.g. <20 year frequency) or too infrequent (when site conditions in mature forest may hamper the fire needed to initiate regeneration). Hence some forest management in the Permanent Timber Production Zone (PTPZ) may help control the risks associated with fire, and a timber harvest can help to maintain access, skills and equipment to deal with unplanned fire. Debate about the management of public land is fundamental to a healthy democracy, but should be informed debate with all players contributing relevant and reliable information. In Tasmania, it appears that lobbying and advocacy is somewhat one-sided, with STT is adopting a 'small target' strategy and withdrawing from informing debate. In the long term, it may be helpful to engage more-proactively with educational materials – hence Recommendation 9 regarding social licence.

Forestry Education

When the RFA was signed in 1997, there were undergraduate forestry programs (B.Sc.For. or similar) at three universities in Australia and the availability of qualified staff could be taken for granted; now there are no universities in Australia with such programs at the undergraduate level, and tertiary forest management training is available only as limited electives in generic science courses, even though the demand for forestry graduates remains strong. While it may seem outside the remit of the RFA, it nonetheless remains in the public interest to have graduates skilled in the management of forested landscapes in Australia. The situation now is not unlike it was in 1925 when a similar need was recognised (e.g., Carron 2000) and universities were equally reluctant to respond because of limited student demand. The provision of an adequate skills base is central to the RFA and is raised in other materials examined in this review (e.g., the SoE mentions loss of corporate knowledge). Future skills shortages can be anticipated unless forest-related agencies in Tasmania and elsewhere in Australia advocate for appropriate training.

Management Plans

RFA Attachment 10, point 8, says 'Ensuring that management plans are implemented for all State Forest and National Parks by the year 2000, and all other reserves within the Formal Reserve element of the CAR Reserve System by the year 2003 Management plans will include objectives and be periodically reviewed to assess performance against each objective'. The Overview reported that '[a]s at 30 June 2021, statutory management plans are approved for 90 reserves covering approximately 65 per cent of the area of reserves on public land', and mentioned the intention to prepare a generic plan for the remaining 700 parks and reserve. In 2023, the SoF Data Report recorded that 'Work has continued on a general management plan, to cover all reserves without a statutory management plan (approximately 716)'. However, it appears that this general plan is not yet complete. It seems desirable to reconcile this inconsistency, either by promptly completing the general plan, or by removing the expectation from the RFA.

Certification

Several informants expressed the view that STT should achieve FSC certification, in contrast to the 2017 review in which many respondents campaigned against certification, suggesting it was a 'marketing device for loggers'. Some informants who felt neutral about the environmental benefits of attaining certification nonetheless advocated for certification to gain public approval. Other informants with timber industry experience, argued that most consumers do not discriminate between the various certification schemes, and that consumers generally placed more emphasis on credentials of the outlet rather than the certification of any individual product. STT has twice sought FSC certification, unsuccessfully (SCS Global Services 2020) but does have Responsible Wood certification (Responsible Wood 2025) (plus an FSC Controlled Wood certificate (FSC 2016) for their plantation estate). One insider was surprised that STT had not attained full FSC certification, because they had demonstrated better practices than many other Australian forest growers who had. Another argued the converse, that STT 'cannot or will not ... [attain] FSC stewardship standards ... [due to] Swift Parrots and ... old growth'. Yet another pointed out that it is very rare for government-owned forestry enterprises in developed countries to secure FSC certification, and the few certified examples all involve highly selective harvesting of small areas.

It is on the public record that FSC auditors highlighted three issues: swift parrot habitat; retention of habitat trees; and better monitoring of disturbance (both natural and management-related), but it is not possible for the present review to test the veracity of other claims, so it is difficult to draw conclusions regarding this issue. However, on the basis of views presented, it seems unlikely that STT can realistically attain FSC certification, and it would seem unproductive to pursue it any further. It is still important for STT to build social licence (as addressed in Recommendation 9), but it seems that the FSC may not be the way to do this.

Setting the stage

This review was fortunate to follow the MONA Forest Economics Congress (Mona 2023) which sought to 'investigate opportunities for forests, ... and imagining and modelling an optimal future', in which diverse participants were hosted in a neutral environment with professional facilitation to

develop and share common views. A report about the congress is available (Lake 2025), but congress conclusions and outcomes have not been published (as the objective was to initiate a discussion, not to produce a document). Nonetheless, the Blueprint Institute (Blueprint Institute 2023) chose this forum to first air their proposal to cease native forest logging, recently aired on ABC television (ABC 2024). While not part of this review, the MONA Congress primed the setting for many informants to this review, encouraging them to think more broadly and inclusively about the issues. The governments may wish to consider the scope for a similar ice-breaking forum as a prelude to subsequent reviews of this and other RFAs.

Conclusion

On balance, it appears that the forest industries in Tasmania are collectively making steady and consistent progress consistent with RFA, especially in the plantation-based forests. However, the native forest sector does not appear overly ambitious and appears to be positioning itself as a 'small target' in public discussions about forestry. It is inevitable that over time, more environmental issues will gradually emerge in Tasmania, and experience elsewhere suggests that the forest industries can be part of the solution (for example, with climate-friendly, naturally regenerated building products). However, in the short-term, the forest industries need to retain and enhance their social licence, and this means discarding the 'small target' strategy, engaging more constructively with a wide range of stakeholders, and ensuring better monitoring and reporting of forest activities and community benefits. More immediately, the FPA needs to ensure that all forest enterprises attain or exceed both the relevant undertakings agreed within the RFA and any future National Environmental Standards, or greater Australian Government intervention can be anticipated. Hence 11 recommendations are offered to assist the forest industries to satisfy the requirements of the RFA, attain National Environmental Standards, and strengthen their social licence to operate. All of these recommendations are important, but three of these, Recommendations 1, 8 & 10, have some urgency.

Appendix A: Terms of Reference for the Independent Reviewer

The role of the Independent Reviewer will be to review the Outcomes of the Tasmanian Regional Forest Agreement 2017-2022 report, the State of the Forests Tasmania Report 2022, Forest Management System: An Overview and associated written public comments, and report to the Joint Working Group.

The Independent Reviewer is required to:

- 1) Receive written submissions from the public on the Outcomes of the Tasmanian Regional Forest Agreement 2017-2022 report with respect to the objectives, commitments, and operation of the Tasmanian RFA.
- 2) Review written public submissions and undertake further targeted consultation with organisations or individuals as required, to clarify any issues raised in the written submissions.
- 3) Provide a written report to the Commonwealth and Tasmanian Ministers responsible for forestry, which:
 - provides comment on the performance of the Tasmanian Regional Forest Agreement over the last five years (2017-2022) and any specific recommendations with respect to the outcomes and objectives of the Tasmanian RFA, considering the written public submissions received
 - to the greatest extent practicable - groups and describes key themes arising in written public submissions, including identifying comments relevant to the automatic extension process
 - lists the names of the individuals and organisations who made written public submissions, where consent to do so has been granted
 - noting the policy framework as established by the National Forest Policy Statement, identifies any issues arising that are particularly relevant to the ongoing implementation of the RFA in the context of the commitment to extend the agreement.
- 4) Deliver the report and all written submissions and information used by the Independent Reviewer to the Joint Working Group.

Timing

The Independent Reviewer must submit their report to the Commonwealth and Tasmanian Ministers responsible for forestry within four months of the closure of the public comment period.

General

The terms of reference should be read in conjunction with the Scoping Agreement.

Appendix B: List of Written Submissions

Andrew Cosgrove

Andrew Ricketts

Australian Climate and Biodiversity Foundation

Biodiversity Council

Birdlife Australia

Britton Timbers

Cradle Coast Authority (NRM)

Environmental Defenders Office

Forestry Australia

Forico Pty Ltd

George Harris

John Hawkins

North East Bioregional Network

Paul O'Halloran

Ta Ann Tasmania

Tasmanian Conservation Trust

Tasmanian Forest Products Association

Tasmanian Land Conservancy

Tasmanian Special Timbers Alliance Inc

The Wilderness Society

Western Junction Sawmill Pty Ltd

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