



*Inquiry on the Progress with
Implementation of the Tasmanian
Regional Forest Agreement (1997)*

Final Recommendations Report

December 2002

Resource Planning and Development Commission

National Library of Australia Cataloguing-in-Publication data:

Inquiry on the Progress with Implementation of the Tasmanian Regional Forest Agreement (1997).
Final Recommendations Report

ISBN 0 7246 7402 0

Resource Planning and Development Commission

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December 2002

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Production by Artemis Publishing Consultants, Hobart, Tasmania

This report is available on the Internet. The Internet address is:

www.rpdc.tas.gov.au

Printed on environmentally friendly paper



Final Recommendations Report

Foreword

The Commission submits to the Minister for Primary Industries, Water and Environment, the Hon. Bryan Green, the final recommendations for the inquiry on the progress with implementation of the Tasmanian Regional Forest Agreement (1997) (RFA).

The Commission's task, was to assess progress against the agreed milestones and specified commitments in accordance with the provisions of Clauses 45, 46 and 47 of the RFA.

The inquiry process has been conducted in accordance with Part 2 of the *Public Land (Administration and Forests) Act 1991*. The Commission published and sought comment on the Background and Draft Recommendations Report. Public hearings were held to assist the Commission consider the representations and finalise its recommendations to the Minister.

The written representations and evidence made at the public hearings have been considered and analysed by the Commission.

The Minister will consider the final recommendations of the Commission and will decide whether to adopt them in full or in part or disregard them.

The Minister must lay a copy of the Report before each House of Parliament within ten sitting days of receipt of the Report, and must also make the report available to the public within 21 days of receipt of the Report.

Julian Green

Executive Commissioner

Resource Planning and Development Commission



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Executive summary

The Tasmanian Regional Forest Agreement (RFA) was signed on 8 November 1997. The RFA, between the Commonwealth and Tasmania Governments (the Parties), established a framework for the management and use of Tasmanian forests for 20 years. The major components of the RFA were:

- A reserve system on public and private land. On public land the system comprises formal reserves, informal reserves and prescriptive management, and on private land the Private Forest Reserve program. These components provide the bridge to Ecologically Sustainable Forest Management;
- Ecologically Sustainable Forest Management encompasses integrated natural resource management, a policy on maintaining a Permanent Forest Estate and management based on sustainable yields. These elements provide the bridge to industry development;
- industry development comprises social and economic development at a regional level, a native forest-based industry and development of a plantation estate and associated industry.

The Resource Planning and Development Commission (the Commission) received a reference under the *Public Land (Administration and Forests) Act 1991* (Tas) to conduct an inquiry and report on progress with the implementation of specified commitments and milestones of the Tasmanian RFA. The RFA explicitly states that the purpose of this review is not to renegotiate the RFA.

The Commission considers the Parties have made substantial progress on implementing the RFA. Ninety specific milestones and commitments were identified in the Terms of Reference for this review. Seventy eight milestones have been completed, or had substantial progress made, eight other milestones have had some progress made, four milestones have had no progress made, although for three of these this was with the knowledge and consent of the Parties. Clearly the Parties have devoted considerable resources toward implementation of the RFA. The Commission has made some specific Recommendations to cover issues where further progress needs to be made in a timely manner.

Much of the criticism of the progress on implementation of the RFA was really criticism of the RFA itself, or at least specific parts of it. As such, this criticism is outside the Terms of Reference for this inquiry. Other criticism was based on issues and outcomes that were also outside the Terms of Reference. The Commission considers that some fine tuning of particular processes, and more attention to communicating with the public, and involving them with the RFA, will address most of these criticisms. These Recommendations have been included in this report. The Commission notes that imprecise language and terms in the RFA itself have contributed to the lack of understanding about the review process, and the expectations from it.

A reserve system on public and private land

The components of the Comprehensive, Adequate and Representative reserve system have all been implemented. This has involved legislative changes, administrative action and policy changes. The status of the formal reserves system has been firmly established in legislation. Informal reserves and management prescriptions have clearly established status in the State and the management is covered by legislation. The Commission considers that managing these reserves, using an approach based on



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environmental management systems, would lead to further improvement of the reserve system.

On private land the program to identify and protect forest communities, where sufficient area was not available for reservation on public land, is underway. While this program took some time to get into stride improved progress has been made recently. The Commission considers the next step of identifying the long term strategy for this program, including monitoring and reporting, needs to be addressed by the Parties in a timely manner.

Many of the criticisms of the reserves system were based on the changes that occurred in the drawing up of actual boundaries of individual reserves. The Commission considers that these changes have been justified and documented and agreed by the Parties and that the end result of an additional 23,400 hectares included in formal reserves highlights this.

Ecologically Sustainable Forest Management

The primary tools for Ecologically Sustainable Forest Management are the *Forest Practices Act 1985* (Tas) and Forest Practices Code, the use of environmental management systems and the statewide natural resource management framework. All of these tools require genuine commitment to continuous improvement by all concerned. Substantial further improvement in the short to medium term is still necessary to reflect that level of commitment. Supporting these tools is the policy on maintaining a Permanent Forest Estate. The Commission considers that progress on Ecologically Sustainable Forest Management has met the terms of the RFA. The commitment of the Parties is clear and unequivocal.

The State has amended the *Forest Practices Act 1985* (Tas) and broadened its application giving legislated controls over all forest clearing for any purpose. The Forest Practices Code has been reviewed and updated to include all relevant provisions of the RFA. The State's commercial forestry arm, Forestry Tasmania, has achieved ISO 14001 certification of its environmental management system. Legislation to establish the natural resource management framework has been passed State Parliament. The Commission considers the State should act with urgency to bring about the proclamation of this legislation. The Commission also considers that the Parties should work with industry to broaden environmental management systems application and usage.

Further development of the processes surrounding threatened species and communities needs to be undertaken. The Commission considers the Parties should complete the Recovery Plan process and develop additional processes supported in a legislated framework. The Commission also considers the State should quickly complete the current review of the policy for maintaining a Permanent Forest Estate and give the policy status through a legislative framework.

Criticism of the progress on Ecologically Sustainable Forest Management was often very specific and detailed. Primarily the issues were ones of interpretation of the Forest Practices Code and often the complaints had been investigated by the Forest Practices Board. Satisfaction of complainants appears hard to achieve. The Commission considers that improving the accountability of the Forest Practices System and the interface between the practitioners and the public, will improve the public's understanding of the Forest Practices System and acceptance of it.



Industry development

The purpose of the RFA is to provide a framework in which industry could thrive and grow. The Commission considers that substantial progress has occurred on the commitments contained in the RFA, but the evidence to support this is mostly anecdotal rather than factual. There are several reasons for this. Industry development is not something that governments can directly control. Stimuli often have unintended effects and outside influences can have short and long term impacts. The Commission considers that the Parties need to revisit the industry development issues to provide a clearer understanding of what their objectives are and what role they will play. This consideration needs to be supported with data collection to enable measurement of progress. The contrast between substantial data to measure environmental progress and the lack of published data to measure social and economic progress is stark.

Commonwealth legislation providing resource security took some years to pass through the National Parliament and this had an effect on industry development. Industry restructuring has also had an effect. At the same time industry development has been occurring with investment in research and development, investment in value adding and development of industry and marketing groups.

Plantation development has grown significantly since the RFA. This has directly provided increased employment and provides a resource base for the future. There are challenges that still need to be met before industry is able to take full advantage of this resource. Plantations were at the heart of much criticism of the implementation of the RFA. Many submitters did not understand the link between Commonwealth funding and plantation development, particularly where this required clearance of native forest. The Commission considers that this link was clearly established in the RFA and that any community issues about plantations need to be addressed at the community level and not as part of this review.

Other criticisms were made within specific industry sectors about access and management of particular resources such as special species timbers. These issues reflect the difficulties associated with managing a multiple use resource. The Commission considers issues such as the supply of deep red myrtle, other special species, tourism strategies, sustainable yield information and apiculture should be part of the revisiting of industry development issues mentioned above. Other criticisms were outside the Terms of Reference.

Conclusion

The Commission finds that the Parties have made considerable progress on implementing the RFA. This review has been conducted in an open and transparent manner and has afforded at least five different opportunities for public input. This report is consistent with other reporting requirements referred to in the RFA, and is based on data agreed by the Parties.



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1. Introduction

1.1 Background to the inquiry

On 4 February 2002 the then Minister for Primary Industries, Water and Environment, the Hon. David Llewellyn, issued a reference to the Resource Planning and Development Commission (the Commission). The inquiry Terms of Reference require the Commission to conduct an inquiry and report on the progress with the implementation of the Tasmanian Regional Forest Agreement (1997) (RFA).

The Terms of Reference are presented in Appendix 1.

The Terms of Reference were amended by the Minister, the Hon. Bryan Green, on 13 September 2002 to extend the date for submission of the Final Recommendations Report to the Minister to 31 December 2002.

1.2 Submissions to the Terms of Reference

Four submissions were received by Minister Llewellyn in response to the public notification of the Terms of Reference. They were from Timber Communities Australia, the Southern Sustainable Forests Group, the Tasmanian Conservation Trust and the Reedy Marsh Conservation Group.

Minister Llewellyn decided that, in his opinion, none of the submissions presented any fact or argument that would justify any change to the Terms of Reference.

1.3 Inquiry process

The inquiry process has been conducted in accordance with Part 2 of the *Public Land (Administration and Forests) Act 1991* (Tas) (the Act).

For the purposes of this inquiry the Commission delegated its functions and powers to conduct the inquiry to a panel consisting of:

- Ms Isobel Stanley (Chair);
- Mr Jeffrey Gilmore (Commissioner, Resource Planning and Development Commission).

The functions and powers of the Panel were limited to sections 6, 7, 17-29 of the Act.

The recommendations in this report are those of the Commission.

To assist the Panel in carrying out its functions, a Reference Panel and an Affected Agency Group was established in accord with Sections 17 and 18 of the Act.

Members of the Reference Panel were:

- Mr Jamie Bayly-Stark (Department of Premier and Cabinet);
- Mr Andrew Blakesley (Department of Infrastructure, Energy and Resources);
- Dr Stuart Davey (Bureau of Rural Sciences); and
- Mr Mark Rounds (Environment Australia).



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The member Agencies of the Affected Agency Group were:

- Agriculture, Fisheries and Forestry Australia (Commonwealth);
- Environment Australia (Commonwealth);
- Department of Premier and Cabinet;
- Department of Primary Industries, Water and the Environment;
- Department of Infrastructure, Energy and Resources;
- Department of Tourism, Parks, Heritage and the Arts; and
- Department of Economic Development.

Advertisements were placed in *The Mercury*, *Examiner* and *Advocate* newspapers notifying the public of the release of all reports released during the process and the dates and venues for hearings.

A Background Report was prepared and released by the Commission on 6 May 2002 and submissions invited. Submissions closed on 8 July 2002. The Background Report included two reports prepared and approved by the Tasmanian and Commonwealth Governments (the Parties):

- details of progress by the Parties against each of the specified milestones and commitments in the Scoping Agreement for the review; and
- a Sustainability Indicators Report providing data on a range of environmental, social and economic indicators for the period 1996-2001.

The Panel analysed all written submissions and held public hearings (see 1.4).

The Panel prepared a Draft Recommendations Report containing Proposed Recommendations in accord with Section 27 of the Act. That Report was released on 30 September 2002 for public comment until 31 October 2002.

The Panel analysed comments on the Draft Recommendations Report and held further hearings (see 1.4). The Panel has prepared this Final Recommendations Report which has been endorsed by the full Commission.

In preparing the Report the Panel took account of the inquiry Terms of Reference, information contained in the Background Report, public submissions received on the Background Report and Draft Recommendations Report and at hearings, information from Affected Agencies and advice from the Reference Panel.

A preliminary draft of the report was circulated among members of the Affected Agencies Group for comments and feedback.

Comments and suggestions were received from the Tasmanian Agencies and further information was provided by the Commonwealth Agencies.

The Panel endeavoured to ensure that the comments and suggestions of the Affected Agency Group members did not take precedence over the public submissions. To that extent, the preliminary draft was amended to remove ambiguity or uncertainty and clarify matters of fact.



1.4 Submissions on Background Report and Draft Recommendations Report

In the course of preparing this Final Recommendations Report the Commission has analysed and given careful consideration to written submissions on the Background Report and Draft Recommendations Report and conducted a series of public hearings. The hearings have provided an opportunity for submitters to elaborate on their written submissions, and for the Panel to seek information from a number of organisations. Hearings on the Background Report were conducted in Hobart on 29 and 30 July 2002, in Launceston on 5 August and Ulverstone on 6 August 2002. The Panel also sought further public submissions from the Tasmania *Together* Progress Board, Forestry Tasmania and the Forest Practices Board in Hobart on 9 August 2002. Hearings on the Draft Recommendations Report were held in Hobart on 19 and 20 November 2002.

The Commission received 110 written submissions on the Background Report and 40 on the Draft Recommendations Report. A list of submitters to the Draft Recommendations Report and Background Report is provided in Appendix 2 and Appendix 3 respectively. Appendix 4 and Appendix 5 provide a summary of the major points provided in each written submission to the Draft Recommendations Report and the Background Report. The Panel heard further representations in support of 35 of the written submissions at the public hearings on the Background Report and 10 on the Draft Recommendations Report. These are indicated in Appendix 2 and 3.

The Commission notes that some submitters acknowledged their issues were outside the Terms of Reference of this review, but they wished to take every opportunity to give public exposure to their expressed concerns. The Commission also notes that some submissions were specifically directed at the balance between competing multiple uses covered by the *Forestry Act 1920* (Tas). Finally, the Commission also notes a number of submissions addressing activities claimed to be 'outside the spirit of the RFA.' The Commission only dealt with those issues covered by the Terms of Reference.

1.5 Structure of the report

Subsequent chapters of this report have been written to address the RFA commitments and associated sustainability indicators that fall into groups of related subjects. These subjects are related to the key elements of the RFA. This differs from the approach taken in the Background Report, which sequentially followed the order of the commitments as presented in the RFA document.

The chapter subjects are:

- land use, including the reserve system on public and private lands;
- Ecologically Sustainable Forest Management of production and reserved forests;
- wood and wood products industry development;
- wood resource security;
- other forest uses, including mining and mineral exploration, tourism and beekeeping;
- process issues; and
- monitoring and reporting.



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The report frequently refers to specific clauses and attachments in the RFA. The main body of the RFA was included as part of the Background Report and is not repeated in this report. The full RFA can be viewed at <http://www.rfa.gov.au/rfa/tas/index.html>

The Commission has tried to avoid the use of acronyms wherever possible in order to improve public understanding of the terms used.



2. *Recommendations*

The following Recommendations are made in this Report.

Recommendation 3.1

That the State continues to improve forest community mapping. Particular attention needs to be given to improving the mapping of forest communities in reserves through additional field survey.

Recommendation 3.2

That the State reserves areas currently vested in the Hydro-Electric Corporation and identified in the RFA as indicative reserves by 30 June 2004.

Recommendation 3.3

That the Parties commit to designing a program that provides for the long term future of the Private Forest Reserve Program and in particular provides for the future financial resources for management, monitoring and reporting of properties conserved under the RFA Private Forest Reserve Program.

Recommendation 3.4

That the State reinforces and makes more effective the mechanism for providing the RFA Private Forest Reserve Program with basic forest type and coverage information for areas being assessed under the Private Timber Reserve approval process.

Recommendation 3.5

That the Parties clarify the commitment in Clause 39 of the RFA and make publicly available information on progress to date and how they intend to pursue the implementation of this commitment including the timelines.



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Recommendation 3.6

That the State makes known its decision on future access to the deep red myrtle resource in the Savage River Pipeline Corridor by February 2003.

Recommendation 4.1

That the State improves the accountability of the Forest Practices System. Issues to consider include:

- improving transparency and communications, in particular, public access to information on Forest Practices Plans, through a central access point designed to improve industry consultation with neighbours and local communities;***
- improving on ground implementation of Forest Practices Plans by introducing minimum standards of training, education and accreditation of forest operatives, and introducing systems to convey the detail of the Forest Practices Code and Forest Practices Plans in a form readily available and understandable to forest operatives;***
- improving public understanding of the Forest Practices System including the Forest Practices Code, the role of the Forest Practices Board and, in particular, the public and legal policy framework in which the Forest Practices Board operates;***
- providing for a specific position on the Forest Practices Board for a person with ecological and/or conservation expertise;***
- reviewing the efficacy of the self-regulatory aspects of the Forest Practices System in the next five year review of the Forest Practices System; and***
- ensuring provision of additional funding, including from industry, to support the communication and research functions of the Forest Practices System.***

Recommendation 4.2

That the State completes the Nature Conservation Strategy and commences implementation of the Strategy by 30 June 2003.



Recommendation 4.3

That the State completes the Reserve Management Code of Practice and commences implementation of the Code by 30 June 2003. That the State undertakes annual reporting on compliance with the Reserve Management Code of Practice.

Recommendation 4.4

That the Parties complete the preparation of Recovery Plans for all endangered forest-related threatened species within the next five years. Where species listed under the Tasmanian Act meet the criteria for listing under the Commonwealth Act, both Parties should contribute funding.

Recommendation 4.5

That the Parties accredit Threatened Species Listing Statements as an alternative to Recovery Plans for listed threatened species, and as providing for adequate management of listed threatened species under the RFA.

Recommendation 4.6

That the State provide for the protection of threatened Forest Communities through an appropriate statutory framework.

Recommendation 4.7

That the State provide sufficient resources, including financial resources to be allocated in the 2003-04 Budget, to ensure that the implementation of the Threatened Species Strategy for Tasmania is carried out in an effective and timely manner.

Recommendation 4.8

That the State subject future substantive changes to management prescriptions for Priority Species to public consultation and take note of public comment.



Recommendation 4.9

That the Parties deliver on the outstanding National Estate commitments contained in Clause 6 and Table 1, Category 3 of Attachment 1 to the RFA, prior to commencement of the next five year review.

Recommendation 4.10

That the Parties prepare a list of relevant research reports at future five yearly reviews.

Recommendation 4.11

That the list of priority research areas in Attachment 13 should be reviewed by the Parties, in consultation with relevant stakeholders, at future five yearly reviews to determine if priorities have changed.

Recommendation 4.12

That the State develops an environmental management system for reserves and other public lands consistent with Attachment 5 of the RFA prior to the next five yearly review.

Recommendation 4.13

That the Parties encourage the development of environmental management systems in the private forest sector.

Recommendation 4.14

That the State completes the review of the policy on maintaining a Permanent Forest Estate taking into account public comment. That, subsequent to the review and before the end of May 2003, the State amends the policy to increase the levels of retention of native forest, and specifically to ensure that no further forest communities become threatened and that there is no deterioration in the status of any existing threatened forest community.



Recommendation 4.15

That, subsequent to the review of the policy on maintaining a Permanent Forest Estate, the State implements the policy through a legislative framework.

Recommendation 4.16

That the Forest Practices Board considers, during the next review of the Forest Practices Code, the issue of smoke management from forestry operations, including giving effect to the smoke management guidelines.

Recommendation 4.17

That the State moves quickly to enable proclamation of the Natural Resource Management Act 2002 (Tas) and facilitate regional natural resource management strategies.

Recommendation 5.1

That the Parties, as a priority, develop a process to obtain reliable data to inform social and economic indicators for the community and the performance of the forest based industries relevant to Attachment 12 of the RFA. The sustainability indicators relevant to the social and economic aspects of the industry need to be reviewed when such reliable data becomes available.

Recommendation 5.2

That the Parties clarify the intent of Attachment 12 by 30 June 2003 and that the State prepares an industry development strategy, in consultation with the Commonwealth and the Forests and Forest Industry Council, by 30 June 2004, based on that intent and providing an industry vision and an action plan to achieve it. Table 5.1 provides an incomplete list of issues that should be covered by the industry development plan.



Recommendation 6.1

That the State continues to improve transparency in reporting, and continuously improves the methodology as identified in previous sustainable yield reviews, with the aim of increasing public understanding of, and confidence in, the sustainable yield reviews of high quality sawlogs from public lands.

Recommendation 6.2

That the State develops a strategy for ongoing supply of special species timbers from public lands. The State needs to provide information to the market to clarify the future resource.

Recommendation 7.1

That the State finalises its nature based tourism and recreational management policy by 31 March 2003.

Recommendation 7.2

That the State continues to work with the apiary industry to resolve the issues on public land for bee keeping and the leatherwood resource. That the State and the Tasmanian Beekeepers Association jointly prepare a plan for management of the leatherwood resource in the southern forests by 30 June 2003.

Recommendation 9.1

That the Parties support ongoing research and development for sustainability indicators including, where appropriate, consideration of benchmarks and interpretation to guide performance outcomes.



3. *Land use*

3.1 **Comprehensive, Adequate and Representative reserve system**

3.1.1 **Background**

This background relates to both the public and private components of the reserve system.

A key element of the RFA was the establishment of a Comprehensive, Adequate and Representative reserve system for forests. The design and magnitude of the reserve system was informed by the comprehensive regional assessment of environmental and heritage values and the national forest reserve criteria, sometimes referred to as the JANIS criteria (The JANIS criteria were developed by and named after the Joint Australian-New Zealand Environment and Conservation Council/Ministerial Council on Forestry, Fisheries and Aquaculture in June 1997).

The reserve system to be established under the RFA was agreed to by the Parties (Clause 50) to have met the JANIS reserve criteria and to sufficiently protect Comprehensive, Adequate and Representative values in reserves.

Under Clauses 48 and 51 of the RFA the Parties agreed to establish reserves on public, Commonwealth and private land as specified in Attachments 6 and 8 of the RFA.

Under Clause 52 of the RFA the State agreed to consult with the Commonwealth prior to rejecting any recommendations made by the Public Land Use Commission (1997b) in regard to tenure for areas listed in Sections 1.7 and 1.8 of Attachment 6. Clause 56 of the RFA required the Commonwealth to make available to the State for timber production, any parts of the Buckland Military Training Area leased from the State, not required for the Comprehensive, Adequate and Representative Reserve System.

Tasmania made commitments in Clause 24 to establish new Formal Reserves identified in Attachment 6 within agreed timeframes and to manage the public land components (exclusive of Commonwealth land) of the reserve system in accord with the objectives in Attachment 7.

Attachment 6 defines the elements of the reserve system on publicly owned land, including formal reserves, informal reserves, Commonwealth land and values managed by prescription. It also defines agreed reservation levels of forest community and old growth forest values in existing and new formal and informal reserves. Attachment 6 contains lists of indicative areas of new formal reserves to be established, their reserve category and the process by which the preliminary boundaries of these reserves are to be finalised. Values on public land to be managed by prescription, wherever prudent and feasible, are also identified.

The Parties recognise that forest values on private land would play an important part in contributing to the Comprehensive, Adequate and Representative reserve system. The RFA identifies that many elements of a Comprehensive, Adequate and Representative forest reserve system could not be adequately established on public land because some elements are substantially or exclusively found on



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privately owned land. The bulk of commitments relating to protecting forest values on private land are contained in Attachment 8 of the RFA. Under Attachment 8, the Parties committed to a suite of initiatives aimed at facilitating a program to protect Comprehensive, Adequate and Representative values on private land, based on the voluntary participation of private landowners. These commitments were specific in covering the principles under which the program would operate, the preparation of a strategic plan for the program, the setting up of various advisory committees, program implementation, and resourcing. The Commonwealth undertook to provide \$30 million for the implementation of the program, as outlined in Clauses 100 and 101(iv) of the RFA.

Some reserves identified in Attachment 6 were to be referred to the Resource Planning and Development Commission prior to proclamation for a recommendation on the land tenure. It was agreed that Tasmania would consult with the Commonwealth before rejecting any recommendations of the Commission.

Clause 57 defines the principles and reporting requirements for any changes to informal reserves.

Further discussion on the extent of, and changes in, reservation of forest, old growth and wilderness values on public and private land are provided in the Background Report under Sustainability Indicators 1.1 and 6.2a.

3.1.2 Issues – Public Land Reserve System

Many submissions received on the Background Report, on the Draft Recommendations Report and in hearings made comment about the Comprehensive, Adequate and Representative reserve system on public land and the degree of implementation of the relevant RFA commitments. The major comments are:

- the Comprehensive, Adequate and Representative reserve system established by the RFA did not meet the JANIS criteria, particularly for some old growth communities and wilderness. Forest communities with high commercial value, in particular, were under reserved;
- more tall eucalypt old growth forest should be reserved as only a small proportion of the original area is left;
- the JANIS criteria have been met, the agreed reserve system implemented, and international benchmark levels for reservation have been exceeded;
- the implementation of the Comprehensive, Adequate and Representative reserve system has led to a significant decline in the quality of sawlogs available to industry;
- more forest than required by the JANIS criteria and the RFA has been reserved. Surplus reservation should be balanced by releasing some reserved forests for wood production;
- in developing the Comprehensive, Adequate and Representative reserve system at the time of the RFA the reserve criteria should have been applied at the bioregional level. If this had been done, then further reservation of forest and old growth would have been required;
- many informal reserves are not ecologically viable and should not be counted. Many reserves are 'islands' surrounded by production forest;



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- informal reserves have an uncertain status and provide an inadequate level of protection;
- wet eucalypt old growth forest values in reserves will be lost over time through natural succession to rainforest;
- formal reserves available for mineral exploration and mining overstate the protection of wilderness values in particular;
- several forest reserves agreed to in the RFA were not proclaimed or were significantly reduced in size. These areas have high plantation value and some have been logged. Some of these areas not reserved, for example Mt Arthur, have other important conservation values such as National Estate and threatened species habitat. It was inappropriate for the State to not proclaim these areas when compensation for their loss had been provided in the RFA;
- a pre-existing reserve (Dans Hill Forest Reserve) has been revoked without explanation and appears to be scheduled for logging;
- details of changes made to informal reserves should have been made publicly available prior to the five year review;
- some agreed new informal reserves appear to have not been implemented;
- some areas of the forest communities on public land that were to be 100 per cent protected on public land have been logged;
- all new reserves and proposed reserves not implemented should be properly surveyed to identify the values they contain; and
- proposals for additional reserves were made for areas such as the north east highlands, Styx Valley, Great Western Tiers, the Tarkine, Ben Lomond, Dip Range and King Island.

The Commission received submissions on the Draft Recommendations Report critical of the Commission's failure to conduct an independent analysis, using the submitter's methodology, to derive the estimate of 10,000 hectares of indicative forest reserves not included in the final set of forest reserves. One submitter in the hearings on the Draft Recommendations Report raised concerns that the prescriptions for managing Comprehensive, Adequate and Representative values on land outside the formal and informal reserve system are inadequate and are not working properly.

3.1.3 Analysis – Public Land Reserve System

The Commission notes that the Parties agreed in the RFA that the Comprehensive, Adequate and Representative reserve system on public land comprised formal reserves, informal reserves and areas managed by prescription outside of reserves. The Parties also agreed that the JANIS criteria had been met. The Commission is aware that in doing so, issues such as the interpretation of the criteria, their application at the regional and bioregional levels, availability of certain reserves for mineral exploration (see Section 7.1), and the size, shape and distribution of reserves in the forest landscape were fully discussed and resolved by both Parties.

Many comments in submissions on the Comprehensive, Adequate and Representative reserve system reflected opinions about how the reserve system was, or should have been, constructed in the RFA. These comments and proposals for new additional reserves are not within the Terms of Reference of



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this inquiry as they relate to what was agreed in the RFA itself, not the implementation of the commitments in the RFA.

The Tasmanian Government has legislated to establish a new system of reserve classes consistent with the provisions of Clause 24(c) and Attachment 7 of the RFA. It has implemented Clauses 24(a), (b) and (d) by proclaiming all but a few of the formal reserves listed in Attachment 6 in the appropriate reserve categories. The exceptions and the reasons are documented in the Background Report. It has given effect to the recommendations of the Public Land Use Commission (1997b) on sections 1.7 and 1.8 of Attachment 6. The only exception is the Darling Ranges Conservation Area on Flinders Island that was the subject of separate inquiry conducted by the Commission, the recommendations for which are currently being considered by Tasmanian Government. Clause 52 of the RFA was not invoked as the State did not reject any of the land tenure recommendations made by the Public Land Use Commission.

The Commission has been informed by Forestry Tasmania, through the Reference Panel, that the Dans Hill Forest Reserve has been revoked to allow its proclamation as a larger Conservation Area under the *National Parks and Wildlife Act 1970* (Tas), and this is proceeding. In the interim, the area continues to be managed for its conservation values and no logging has or will be undertaken within the reserve area.

The Background Report shows that the commitment in Attachment 6 to the RFA to add an additional area of 473,474 hectares of formal reserves has been exceeded by approximately 39,000 hectares, with an improved result in capturing target vegetation within the reserve system. The increase in reserve area has been largely due to implementation of other Commission recommendations in the Central Highlands, while the increase in forest area has largely been through more detailed evaluation of provisional reserve boundaries, the continued reservation of areas of importance identified through the forest practices system and land purchased through the Private Forest Reserve Program. Evidence presented to the Commission at a hearing by Forestry Tasmania, indicates that the extra reservation has had minimal negative impact on available production forest values and sustainable yield, for which compensation was provided in the RFA. Of the 103,000 hectares of forest reserves proposed in the RFA approximately 4,500 hectares were not proclaimed. Forestry Tasmania advised that about 2,000 hectares of the 4,500 hectares were incorporated into other formal reserves, 2,000 into informal reserves, leaving less than 500 hectares not reserved due to boundary adjustments. Several other areas not identified for reservation in the RFA have been created as forest reserves during the last five years.

Although some submissions highlighted that some individual reserves are smaller than proposed in the RFA, the Commission notes that many are larger and that the net effect is a more extensive and comprehensive reserve system. An examination of Tables 1 and 2 in the report on implementation of Attachment 6 contained in the Background Report shows that agreed levels of reservation for most forest communities and old growth forest communities have been either met or exceeded. Where area targets have not been met these are generally small in extent and adequately explained by errors in mapping data. The report also explains in detail the process for reviewing provisional boundaries of reserves agreed in the RFA and the reasons why a few reserves were either not proclaimed or had significantly bigger or smaller areas.



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The Commission has reviewed and understands the methodology used by submitters to derive the estimated 10,000 hectares of indicative forest reserves claimed to have been omitted from the final forest reserves, but notes that it does not take account of additional areas included in Forest Reserves to capture the targeted forest communities and other Comprehensive, Adequate and Representative values. The Commission considers the lack of transparency of the finalisation of the reserve boundaries between the Parties to have contributed to some public uncertainty about the final reserve areas and boundaries. However, the Commission finds no basis for the assertions contained in several submissions that 10,000 hectares of forest reserves agreed to in the RFA were not proclaimed.

The Commission notes the advice provided by Forestry Tasmania, at a hearing, that the area excluded from the Mt Arthur Forest Reserve that contained important habitat of the threatened Mt Arthur Burrowing Crayfish has since been reserved by Forestry Tasmania following further consideration of the issue. This demonstrates an appropriate adaptive response to forest management.

The Commission has considered the issue of finalisation of the indicative boundaries of formal reserves and after considering the evidence above finds that the State has adjusted the indicative boundaries in accordance with the protocols provided for in the RFA. The Commission notes that better communication with interested stakeholders on the changes, and the reasons behind them, at an earlier stage would have been advisable. Recommendations regarding communications are found in section 4.2 of this report.

The JANIS criteria have been exceeded for some communities and the Commission notes the assertion that this has had an adverse impact on the wood resource available to industry. The Commission considers that exceeding the JANIS criteria in some circumstances is an inevitable outcome of the process of establishing viable boundaries to the Comprehensive, Adequate and Representative reserves, and that the process for finalising the reserve boundaries was agreed by the Parties on the signing of the RFA.

It appears as if a major contributor to the concerns of some submitters has resulted from the errors in the original forest community mapping used in the RFA. Some submissions specifically referred to errors in the data and for the need for improvement through more detailed field work and the incorporation of more recent work. Forestry Tasmania at a hearing advised the Commission that the original mapping was designed primarily for regional scale analysis, and was not of sufficient accuracy for reliable use in detailed reserve boundary design. Although the mapping was the best available at the time for the purpose of the RFA, and a significant advance on what had been previously available, the Parties knew that there would be errors when used in the forest. The Commission considers that the Parties should work towards continuous improvement of the forest community mapping, particularly in reserves.

Recommendation 3.1

That the State continues to improve forest community mapping. Particular attention needs to be given to improving the mapping of forest communities in reserves through additional field survey.



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The concern that eucalypt old growth forest values in reserves will be lost as the forest gradually converts to rainforest is noted and further discussed in section 4.21 of this report.

Clause 57 requires a reconciliation of changes to the informal reserve system to be made publicly available and provided to this review. Information on changes made has been provided in the Background Report, and maps are available for viewing at Forestry Tasmania. The information indicates that the informal reserve system is maintaining the protection of values within the reserve system at the regional scale, as required by Clause 57. The three forest communities which have recorded small reductions in the level of protection in Informal Reserves since 1999 are all reserved at levels in excess of the JANIS reserve criteria.

It is noted that parts of a number of formal reserves agreed to in the RFA (for example numbers 172, 230, 242, 245, 258) are lands vested in the Hydro-Electric Corporation, and are yet to be proclaimed. It is intended that these areas be added to reserves, as agreed in the RFA following review by the Hydro-Electric Corporation of their vested land requirements.

Recommendation 3.2

That the State reserves areas currently vested in the Hydro-Electric Corporation and identified in the RFA as indicative reserves by 30 June 2004.

Information provided to the Commission in submissions that some forest communities on public land had been logged when the RFA required that they be 100 per cent protected, where prudent and feasible, is beyond the capacity of the Commission to investigate further. However, the Commission notes that the Parties have recognised this issue and have established systems and procedures under the Forest Practices Code to ensure appropriate consideration and implementation of this commitment (see section 4.2) particularly in determining what is prudent and feasible.

The Background Report states that areas of the Buckland Military Training Area leased from the State by the Commonwealth, and not required for the Comprehensive, Adequate and Representative Reserve System, have been made available for timber production purposes, in accordance with Clause 56 of the RFA.

The Commission finds that the Parties have satisfactorily implemented their commitments in Clauses 24, 48, 51, 52 and 56 and Attachment 6.5, 6.18 and 6.21 of the RFA.

3.1.4 Issues – Private Forest Reserve System

The following matters were raised in submissions to the review relevant to conservation of Comprehensive, Adequate and Representative values on private land:

- there is a need to protect certain forest communities and old growth types on private land;
- the Private Forest Reserve Program has been too slow in achieving its target reservation levels, it has under performed against its target of 100,000 hectares by year 2004 by securing only 6,411 hectares by 2001;



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- \$30 million provided under the RFA is insufficient to implement the Private Forest Reserve Program. The work done to date has been a thorough scientific approach, but there is disappointment that the complete system has not been achieved in the first five years. The non-achievement of targets may mean the return of unspent funds to the Commonwealth;
- it is important that target values are given the highest priority in developing the system, and the benevolence of private land owners with non-target forest should not absorb the resources available to achieve the programs targets;
- the RFA provides the opportunity for private forest owners to sustainably manage their forests, and a significant component has been the acceptance of the Private Forest Reserve Program and off-reserve management;
- concern was expressed about the lack of vegetation clearance controls required to give effect to the Private Forest Reserve Program; and
- concern was expressed at the perceived failure of the Forest Practices Board to refer to the Private Forest Reserve Program, target vegetation found in areas subject to Forest Practices Plans.

The Commission received a submission in response to the Draft Recommendations Report suggesting that the social and economic costs of the Private Forest Reserve Program, particularly the impact on small country sawmillers, should be studied and documented.

3.1.5 Analysis – Private Land Reserve System

The Commission is satisfied that the Private Forest Reserve Program has generally been implemented in accord with the RFA commitments in Clause 59 and Attachment 8. The Private Forest Reserve Program has been established in accord with the eight principles outlined in Attachment 8. The Commission notes the evidence provided in submissions and at hearings that the Private Forest Reserve Program would not achieve its objective to have the private land reserve component established within four years, or the funds expended before the scheduled expiry of the program. The Commission's Reference Panel sought advice from the Department of Primary Industries, Water and Environment on the issue of the future of unspent funds identified for the Private Forest Reserve Program. The Reference Panel was advised that the Parties agreed in May 2002, in accordance with principle (i), to an extension allowing for the commitment of the Natural Heritage Trust component of the RFA funding (\$20 million) up until 30 June 2004.

The Department of Primary Industries, Water and Environment advised the Commission through the Reference Panel that at June 2002, the Private Forest Reserve Program had secured less than a quarter of the 100,000 hectare target, and had spent less than a quarter of its budget. One of the main reasons cited for this slow progress was that it took a much longer time to set up the necessary policy and administrative frameworks as required under the strategic plan. Negative Capital Gains Tax implications for landowners who might have been interested in the capital payment incentive offered under the Private Forest Reserve Program was also given as a reason for slow progress. Recent changes to tax law, under the Commonwealth's environmental tax package, have now alleviated some of the Capital Gains Tax issues, however impediments still remain for some landowners.



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The time extension was contingent on a number of improvements to the Private Forest Reserve Program designed to provide more targeted protection of threatened forests, and a more balanced and flexible approach to securing the best Comprehensive, Adequate and Representative reserve system on private land. The improvements took into account the Private Forest Reserve Program's strategic reserve design component, and the need to secure the best possible conservation outcomes at the lowest possible cost and reduce the delay in finalising covenants. The Private Forest Reserve Program is now starting to accelerate, with a large and growing number of approvals secured. The August 2002 Private Forest Reserve Program progress report (Department of Primary Industries, Water and Environment, 2002) indicated that 15,686 hectares of forest was protected, an increase of about 9,000 hectares in the past 12 months, and that a further 4,658 hectares of forest was approved and under negotiation.

However, progress towards securing the vulnerable and endangered community priorities, identified under the strategic plan, remains slow. The Commission notes the linkage to the policy on maintaining a Permanent Forest Estate and considers that refining the Permanent Forest Estate policy (see Recommendation 4.14), would significantly improve this situation.

The Commission considers that by the time funds provided under the RFA have been expended the Private Forest Reserve Program should have delivered substantial conservation benefits. However, it is likely that the Private Forest Reserve Program's protection targets will not have been fully achieved. There will be an ongoing, and currently unfunded, need for further conservation programs on private land. The Commission considers that the Parties should determine the future needs of the Private Forest Reserve Program before the next five year review and makes Recommendation 3. 2 below.

Under principle (iii) of Attachment 8 of the RFA, the Private Forest Reserve Program endeavours to maximise agreed Comprehensive, Adequate and Representative values on private land in a cost-effective manner. The Background Report records that a number of approaches and mechanisms were introduced to provide cost-effectiveness, but does not provide an analysis on actual cost-effectiveness. In November 1999, as part of an overall review of the Natural Heritage Trust, Environment Australia commissioned PricewaterhouseCoopers to evaluate and review the Private Forest Reserve Program's performance. The Commission notes PricewaterhouseCoopers' summation that drawing conclusions on cost-effectiveness was difficult given the few precedents for such programs, the high variability in land market values, the nature of restrictions on use, and the slow start to the Private Forest Reserve Program (with few reserves established at that time) (PricewaterhouseCoopers 1999). Despite this difficulty, PricewaterhouseCoopers still found that, based on performance after one year, the Private Forest Reserve Program would be *...unlikely to achieve the targets set for it in a timely and cost-effective manner based on performance to date and the current resources allocated to the Program Unit* (PricewaterhouseCoopers 1999, p.18).

The Commission notes the lack of information on cost-effectiveness. It might seem prudent three years on, and with many more reserves established or approved, to again conduct a review of the Private Forest Reserve Program as a whole, similar to that carried out in 1999. However, with less than two years remaining for the commitment of Natural Heritage Trust funds, the Commission considers that it would be of little value to recommend or carry out such a review.



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Commitments relating to the Strategic Plan and identification of priorities, as outlined in Attachment 8.1-8.5, have generally been met. Although the Strategic Plan was not developed within three months as specified in Attachment 8.2, its later development (in July 1998) had negligible effect on the Private Forest Reserve Program's implementation.

Attachment 8.5 specifies that the Strategic Plan must identify, among other things, implementation, review and monitoring arrangements. Although these arrangements have been identified in the Strategic Plan, it is difficult to ascertain whether effective monitoring procedures have been put in place. The Commission was advised by the Department of Primary Industries, Water and Environment through the Reference Panel that program managers are currently developing a charter for monitoring compliance with the terms of various covenanting and management agreements. However, the Commission considers there needs to be a specific program in place, backed by adequate funding, outlining and directing the level of monitoring, and nature of support for landowners, that will occur during the life of the RFA and beyond. Landowners who take part in the Private Forest Reserve Program need the assurance that they can access a level of management, technical advice and assistance in return for conservation management activity in the long term.

The Commission considers that such a program needs to be put formally in place. The following Recommendation aims to ensure that the current investment in protecting conservation values on private land is secured into the future. The notion of shared responsibility, in the terms of the conservation covenant or management agreement, applies to both the landowner and the Agency administering the program. The aim of the Recommendation is to ensure that conservation values are actively maintained in perpetuity, and do not erode through lack of commitment by either the landowner or the administering Agency.

The Commission considers that increased resources will be required to reach the target of 100,000 hectares of priority vegetation in the Private Forest Reserve System, and/or to fund ongoing management agreements into the future. The Commission notes the sensitivity of the Parties committing to additional financial resources. The following Recommendation is made within those constraints.

The Commission notes that the Private Forest Reserve Program is based on the voluntary participation of private land owners, who make individual decisions about the use of their land. Potential social and economic impacts on small country sawmillers are subsidiary to those decisions.

Recommendation 3.3

That the Parties commit to designing a program that provides for the long term future of the Private Forest Reserve Program and in particular provides for the future financial resources for management, monitoring and reporting of properties conserved under the RFA Private Forest Reserve Program.

The Advisory Committee and the Scientific Advisory Group have been established and are functioning as required under Attachment 8.6-8.8 of the RFA (Background Report). The Commission



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is generally satisfied that the implementation commitments as specified under Attachment 8.9-8.17 have been progressed accordingly, with one exception.

Attachment 8.16 of the RFA states that *...identification of potential areas for protection will be through a direct approach for priorities identified in the strategic plan and Forest Practices Plans and Private Timber Reserve processes.*

Although a submitter on the Background Report queried whether Forest Practices Plans were being referred to the Private Forest Reserve Program, the Commission received no evidence that this was not happening. On the contrary, advice provided by the Department of Primary Industries, Water and Environment to the Commission, through its Reference Panel, is that this process is working consistently well and is supported by the Comprehensive, Adequate and Representative Advisory Committee.

The Commission was advised by the Forest Practices Board, Private Forests Tasmania and the Department of Primary Industries, Water and Environment through the Reference Panel, that the intention behind these referrals is to provide early notification to the Private Forest Reserve Program of potential target vegetation. The Private Forest Reserve Program is then in a position to ensure that an owner is made aware of options other than wood production. Discussion of the options needs to occur as soon as possible, and preferably before the landowner decides to harvest the resource. The referral at the time the landowner lodges a Forest Practices Plan, is often too late because the landowner is committed to logging the resource. This potentially makes it more difficult to negotiate its inclusion in the Private Forest Reserve Program.

The Commission was advised by the Forest Practices Board, Private Forests Tasmania and the Department of Primary Industries, Water and Environment through the Reference Panel, that the State has instituted a system of when applications for Private Timber Reserves are received by Private Forests Tasmania for land that might support target vegetation communities, they are forwarded to the Private Forest Reserve Program prior to their consideration by the Forest Practices Board.

Private Forests Tasmania currently:

- provides information on the Private Forest Reserve Program via a printed leaflet to landowners making enquiries about forest management, or requesting information about Private Timber Reserve applications;
- informs the Private Forest Reserve Program of applications at the time they are lodged by forwarding a copy of the public notice advertising the application and is generally the first stage at which Private Forests Tasmania gets involved;
- checks to see that Private Timber Reserve applications have been referred to a Forest Practices Officer (if a Forest Practices Plan has also been prepared) or the Private Forest Reserve Program if appropriate; and
- provides a forest management planning service where the option to conserve values, or reserve land through the Private Forest Reserve Program is canvassed with clients.

The Commission considers that given the strategic focus of the Private Forest Reserve Program, the opportunistic referral of applications for Private Timber Reserves is of lesser importance than other measures for identifying potential additions to the Private Forest Reserve Program. This is particularly



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the case in recent times when an application for a Private Timber Reserve frequently follows certification and completion of a Forest Practices Plan. It is nevertheless important that this referral mechanism be available to the Private Forest Reserve Program and that every opportunity is taken to identify potential target vegetation for protection under the Program as soon as possible.

In addition, property based planning or whole farm planning, and the forest management planning service provided by Private Forests Tasmania provides the opportunity to identify potential target vegetation for protection under the Private Forest Reserve Program. The landowner, during the planning phase, is exploring the allocation of land to various uses, and is not burdened by any contractual wood supply obligation usually associated with a Forest Practices Plan.

It should be noted that a Private Timber Reserve does not constrain a landowner from subsequently seeking or agreeing to the land becoming part of the Private Forest Reserve Program. Revocation of a Private Timber Reserve is a simple process and a number of areas have been revoked and become part of the Private Forest Reserve Program. A Private Timber Reserve does not confer a right to harvest the timber resource. The landowner still needs to obtain approval for a Forest Practices Plan, and as part of that process, the proposed forest operation is subject to rigorous assessment of RFA and other values with due referral to the Private Forest Reserve Program, if appropriate.

The Commission considers that the Private Forest Reserve Program would benefit from consistent notification by Private Forests Tasmania of forest type information for areas assessed for Private Timber Reserve. This information need only be forwarded for areas that contain, or potentially contain, forest communities that are priorities for the Comprehensive, Adequate and Representative reserve system. This would allow program managers to be more pro-active and effective in terms of making decisions on whether to carry out further investigations to identify areas for protection. It would also provide landowners with the earlier opportunity to consider conservation and financial options.

The Commission considers that the Private Forest Reserve Program would also benefit from a system of quarterly reporting to the Comprehensive, Adequate and Representative Scientific Advisory Group providing information on the number of Private Timber Reserve applications, the number with prospective Comprehensive, Adequate and Representative target vegetation and the number referred to the Private Forest Reserve Program.

Recommendation 3.4

That the State reinforces and makes more effective the mechanism for providing the RFA Private Forest Reserve Program with basic forest type and coverage information for areas being assessed under the Private Timber Reserve approval process.

Financial commitments, as specified under Attachments 8.18-8.22 of the RFA, have generally been progressed in a satisfactory manner. The Commission has been advised by the Department of Primary Industries, Water and Environment that Tasmania has provided \$581,658 to the administration and monitoring of the Private Forest Reserve Program through the provision of office accommodation, ancillary services, technical, scientific and corporate support.



3.2 World Heritage

3.2.1 Background

The Parties agreed to further joint assessment of relevant Australia-wide World Heritage themes to commence by 30 June 1998. These were to be drawn from Table 1.7 of the World Heritage Report produced as part of the Comprehensive Regional Assessment (Public Land Use Commission, 1997d).

The World Heritage Report identified six themes of relevance to Tasmania, in particular forested areas of Tasmania. These included: fossils; relicts and refugia; rainforest; *Eucalyptus* domination of the vegetation; complex persistence of a hunting-and-gathering society on a single continent; and forced migration – a major way in which the expansion took place.

The Parties agreed to full consideration of any social and economic consequences of any future World Heritage nominations. The Parties also agreed that future nominations involving the forest estate would come from the dedicated reserve system, and that management and funding arrangements would be in place before any nomination is made.

3.2.2 Issues

Several submissions on the Background Report referred to the requirement to undertake further joint assessment of relevant Australia-wide World Heritage themes commencing by 30 June 1998. Most of these referred to the lack of substantive progress against this commitment.

A submission on the Background Report raised the issue in the context of the commitment at Clause 55 on the future of access to the Savage River Pipeline Corridor. The view put was that any decision on the Savage River Pipeline Corridor should be informed by the outcomes of a thorough assessment of World Heritage values.

A submission in response to the Draft Recommendations Report questioned whether the Parties had met their obligations under the World Heritage Convention.

3.2.3 Analysis

The Parties have undertaken further assessment of one of the six potential World Heritage themes as identified in the Comprehensive Regional Assessment. They arranged for a national expert panel to undertake an assessment of the World Heritage theme of *Eucalyptus* dominated vegetation in March 1999. The report of that meeting was completed in December 1999.

The Commission notes that the commitment was to commence a joint assessment by 30 June 1998 with the implication being that it would continue for some time beyond that date. There has been no decision reported by the Parties on the outcomes of the March 1999 workshop. The Parties have not reported any initiatives to address any of the other five World Heritage themes of relevance to Tasmanian forests.



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However, the Commission notes that a national approach to identifying areas for potential World Heritage nomination is being developed by the Commonwealth in the context of proposed changes to the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (Environment Australia, 2002). It is expected that this will address World Heritage commitments under the RFA. The Commonwealth enacted the Act subsequent to the signing of the Tasmanian RFA. The Commonwealth is awaiting the successful passage of amendments to the Act that provide for the establishment of a list of nationally significant places. Future Commonwealth nominations for World Heritage listing will be drawn from the list of nationally significant places. Places will be assessed for inclusion on the national list on the basis of a number of national themes that broadly reflect the Australia-wide themes identified by the World Heritage Expert Panel (Public Land Use Commission, 1997d).

The Commission was advised by Environment Australia through the Reference Panel that nominated places will be subject to an assessment process that will include a comparative analysis with other national places identified under the same theme(s). Further the Commission was informed that the Commonwealth has advised the World Heritage Committee that it will examine the applicability of the World Heritage theme of *Eucalyptus* dominated vegetation in this context.

Clauses 40, 41 and 42 have not been invoked as there have been no further World Heritage nominations in forested areas of Tasmania.

Consideration of the outcomes of World Heritage theme evaluations in the decisions relating to access to the Savage River Pipeline Corridor is not a requirement of the RFA and is therefore beyond the scope of the Review.

Recommendation 3.5

That the Parties clarify the commitment in Clause 39 of the RFA and make publicly available information on progress to date and how they intend to pursue the implementation of this commitment including the timelines.

3.3 Wilderness

3.3.1 Background

Wilderness is a value that was considered in the development of the Comprehensive, Adequate and Representative reserve system. Information on the extent of, and changes to, reservation of wilderness values is provided in Sustainability Indicator 6.2A in the Background Report.

Wilderness is also a National Estate value. Attachment 1 of the RFA and Clauses 25 to 27 inclusive relate generally to the agreement on management of National Estate values (see Section 4.8). The Parties agreed to manage the National Estate wilderness values as set out in Attachment 1 and the Commonwealth confirmed that the RFA met its obligations under the *Australian Heritage Commission Act 1975* (Cth).



3.3.2 Issues

Submissions were made to the effect that the figures presented were deliberately misleading. It was said that the RFA related to forest land, and that the area of forested high quality wilderness land in reserves was considerably less than 95 per cent of the total.

3.3.3 Analysis

Wilderness is a value that is independent of the vegetation cover of the land. The figures cited in the Background Report provide a report card on the level of reservation of land classified as high quality wilderness.

The information provided in the Background Report indicates that the intention of the Parties to reserve 95 per cent of the land designated as high quality wilderness has been realised.

The Commission finds that the Background Report fairly reported on the level of reservation of high quality wilderness land, and that the commitments in respect of the management of wilderness values have been discharged accordingly.

3.4 *Savage River Pipeline Corridor*

3.4.1 Background

Clauses 54 and 55 of the RFA make special provision for the area known as the Savage River Pipeline Corridor. They provide for the postponement of logging operations in the Corridor pending a review of resource estimates for deep red myrtle. This review was to be undertaken by the State within the first four years of the RFA, and be independently audited and published.

If the resource review showed that a supply of 4,500 cubic metres per year of deep red myrtle of acceptable quality and economic accessibility, could be maintained from outside the Savage River Pipeline Corridor then the RFA provides for the postponement of logging to continue for the term of the RFA. In the event the resource is not available outside the Savage River Pipeline Corridor, then the Tasmanian Government is to consider future management of this area to ensure the availability of deep red myrtle.

The report on the review of Deep Red Myrtle Resource in Tasmania was released on 12 June 2002 after the release of the Background Report (Mesibov, 2002).

3.4.2 Issues

There were a number of issues raised in submissions on the Background Report and at hearings under the general heading of the Deep Red Myrtle Review:

- the proposed cut of 4,500 cubic metres per year would result in the resource being cut out by 2030 and that this was unsustainable harvesting;



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- the report of the resource review had not been made public during the first four years of the RFA and was not available as part of the documentation for the RFA five year review;
- the report demonstrated the need for access to myrtle resources in the Savage River Pipeline Corridor;
- the report was passed to auditors prior to being made publicly available;
- the future of the Savage River Pipeline Corridor should be reviewed by the Commission;
- the report on the Deep Red Myrtle Resource Review was late and there had been inadequate time for the public to consider it, therefore the decision on future forestry access to the Savage River Pipeline Corridor should wait until after the next five year review, or be quarantined for the duration of the RFA;
- the methodology used in the resource review was questioned, in particular the exclusion of the resource on private land, in patches less than 10 hectares or resource from arisings; and
- making the Deep Red Myrtle Resource Review available on the internet was not considered as an adequate form of publication. This point was raised again in submissions on the Draft Recommendations Report.

3.4.3 Analysis

Tasmania has deferred harvesting in the Savage River Pipeline Corridor area, defined in the RFA, since 1997. The Commission considers that Clause 54 of the RFA has been met.

The Commission notes that since publication of the Background Report the required report on the Deep Red Myrtle Resource Review has been completed and independently audited. It was published on the Department of Premier and Cabinet website (www.dpac.tas.gov.au/policy/rfa) on 12 June 2002, in accordance with the State Government's policy on publication. Although not an RFA commitment, the Commission notes that the State has sought public comment on the Deep Red Myrtle Resource Review report. The requirements of Clause 55(a) and (b) have been met, except that the Deep Red Myrtle Resource Review report, with the independent auditor's report was published late. However, the intent of the Parties in Clause 55(b) regarding the timing of publication of the independent auditor's report is not precise.

The Commission notes that there is no requirement in the RFA for the substance of the Deep Red Myrtle Resource Review report to be a subject of the five year review, and that the RFA places the decision on future access to the Savage River Pipeline Corridor firmly with the Tasmanian Government (Clause 55c). The Deep Red Myrtle Resource Review report indicates that supply of 4,500 cubic metres per year of deep red myrtle sawlogs cannot be maintained from outside the Savage River Pipeline Corridor area.

The Commission considers that there is no requirement in the RFA for the Deep Red Myrtle Resource Review report to have been publicly released prior to it being audited. The Commission is of the view that it was preferable to have the report published complete with the auditor's report, and amendments arising from the auditor's comments, so as to more fully inform the public on the issue.



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The Commission notes that a sustainable rate of harvesting of deep red myrtle resource would be based on a rotation of 150 to 200 years (Mesibov, 2002). The Commission notes that, at the rate provided for in the RFA, the harvest of deep red myrtle resource would not be sustainable. The Commission notes the difficulties in reconciling a sustainable commercial harvest for a particular area from an ecologically sustainable yield of a forest type. The deep red myrtle issue deals with the concept of a sustainable commercial harvest that needs to be determined between the resource managers and the industry. For this reason the decision-making process on the Savage River Pipeline Corridor should be conducted as a matter of urgency.

The issue of the methodology used in compiling the review of the deep red myrtle is beyond the scope of this Review. The RFA requires that the Deep Red Myrtle Resource Review report be vetted by a qualified auditor. The Commission notes that this has been done.

The Commission notes that the Tasmanian Government is yet to announce a decision on future management of the Savage River Pipeline Corridor subsequent to Clause 55(c) and (e). This decision is of interest to many stakeholders and should be made at the earliest opportunity.

Recommendation 3.6

That the State makes known its decision on future access to the deep red myrtle resource in the Savage River Pipeline Corridor by February 2003.

3.5 Deferred Forest

3.5.1 Background

Clause 53 provides for the transfer of all Deferred Forest Lands not required for the Comprehensive, Adequate and Representative reserve system onto the Register of Multiple Use Forest Land. Deferred Forest Land originated from the Forests and Forest Industry Strategy. Land on this Register was neither reserved, nor available for wood production, pending further assessment of values and productivity improvements in the Register of Multiple Use Forest. Following the land allocation decisions in the RFA the Register of Multiple Use Forest was no longer required and has been revoked from State legislation.

Attachment 6.23 requires the referral of certain Deferred Forest Lands to the Public Land Use Commission for recommendations on land tenure and management.



3.5.2 Issues

A number of submissions commented about Deferred Forest Lands under the RFA. The following two related issues were raised:

- the area of land now available to the logging industry as having risen as a consequence of the RFA; and
- the payment of compensation by the Commonwealth Government to an industry that has gained additional resources.

3.5.3 Analysis

All Deferred Forest Lands not required for the Comprehensive, Adequate and Representative reserve system have been allocated either to the Register of Multiple Use Forest Land or to Crown land. Deferred Forest Lands specified in Attachment 6.23 were referred to the Public Land Use Commission for recommendations on land tenure and management (Resource Planning and Development Commission, 1999). The Tasmanian Government implemented the recommendations of the Resource Planning and Development Commission to allocate these lands to various land tenures. Only land with limited forestry potential has been retained as vacant Crown land. The Commission finds that this is consistent with the intent of the RFA and that the commitments in Clause 53 and Attachment 6.23 have been met.

The issue of increased wood resource becoming available to the forestry industry as a consequence of the RFA is based on the premise that Deferred Forest Lands were reserved from logging. This is not the case. An outcome of the Forests and Forest Industry Strategy (Forests and Forest Industry Council, 1990) was to impose a moratorium on logging in the Deferred Forest Lands pending further allocation of these lands to conservation, and production, following productivity gains in the Multiple Use Forest Lands. The wood resource in the Deferred Forest Lands was always included as part of the sustainable supply available to industry. The RFA has, in effect, replaced the Forests and Forest Industry Strategy and implemented the assessment and allocation of the former Deferred Forest Lands to reserves and Multiple Use Forest. Clause 53 of the RFA specifically provides for the incorporation of those Deferred Forest Lands not required for the Comprehensive, Adequate and Representative reserve system to be transferred to the Register of Multiple Use Forest Land.

The Commission finds that there is no basis to the assertion that the industry received access to more land (and resource) than it lost as a result of the RFA, or that compensation funds have been provided inappropriately.



4. *Ecologically Sustainable Forest Management*

4.1 **General**

4.1.1 **Background**

Ecologically Sustainable Forest Management is defined in the RFA to mean forest management and use in accord with the specific objectives and policies for ecologically sustainable development as detailed in the National Forest Policy Statement. These objectives and policies canvass a wide spectrum of subjects covering most aspects of the RFA. Ecologically Sustainable Forest Management takes into account the requirements of the current generation and the needs of future generations.

The Parties agreed that achieving Ecologically Sustainable Forest Management required a long term commitment to continuous improvement. The key elements for achieving Ecologically Sustainable Forest Management are:

- establishment of the Comprehensive, Adequate and Representative reserve system;
- development of an internationally competitive and economically sustainable forest products industry, which provides economic and social benefits; and
- a fully integrated, responsive and strategic forest management system capable of responding to new information.

The forest management system includes integrated planning processes, codes of practice, environmental prescriptions, management plans and sustainable yield harvesting systems. They apply to the harvesting of wood products and to the other commercial and non-commercial use of forests.

The State affirmed its long term commitment to Ecologically Sustainable Forest Management on all public and private land in Clause 63 of the RFA.

Tasmania committed to further development of its forest management system consistent with the principles outlined in Attachment 5 to the RFA, and specifically to introduce environmental management systems, acknowledging that its objective for State Forests was a system comparable with the ISO 14000 series.

The State agreed to the further improvement of Ecologically Sustainable Forest Management by implementation of a number of specific measures detailed in Attachment 10. These include commitments on:

- water quality;
- catchment management;
- strategic and management planning;
- Aboriginal and historic cultural heritage;
- specialty timbers; and
- resourcing and independence of the Forest Practices System.



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Tasmania agreed to publish annual compliance audits of implementation of the *Forest Practices Act 1985* (Tas), the Forest Practices Code, and the Reserve Management Code of Practice.

Tasmania committed to independent expert reviews at five yearly intervals for both the Forest Practices Code and the Reserve Management Code of Practice (see section 4.5 and 4.20).

4.1.2 Issues

Issues raised by submitters to the review range from the generic to the specific. For example, some submissions questioned or made general statements about Tasmania's Ecologically Sustainable Forest Management practices. Others made detailed comments on the management of particular values or the operation of particular management systems.

Many Ecologically Sustainable Forest Management issues are addressed under other headings in this report. Only those issues not covered elsewhere are addressed here.

The issues are grouped under headings and where appropriate linked to the relevant clauses in the RFA.

4.2 Forest Practices System

4.2.1 Background

There were a number of commitments in the RFA relating to different aspects of the Forest Practices System, and a significant number of representations on the Forest Practices System, the Forest Practices Code and the Forest Practices Board were received. These are discussed below under a set of subheadings.

4.2.2 Issues

Compliance Audits

Clause 94 of the RFA requires the State to publish and make publicly available annual compliance audits of the *Forest Practices Act 1985* (Tas), the Forest Practices Code, and its Reserve Management Code of Practice specified in Attachment 10 (See Section 4.5).

The Background Report records the annual reporting of the compliance audits relating to implementation of the *Forest Practices Act 1985* (Tas) and the Forest Practices Code. The Background Report also reports that the Reserve Management Code of Practice is not yet complete and so no compliance audits have yet been undertaken.



Transparency of process

Attachment 10.9 of the RFA required the State to implement, as a high priority, the mechanisms for improving the transparency and independence of the Forest Practices Board.

A number of submissions on the Background Report, Draft Recommendations Report, and at hearings contained concerns about aspects of the role and function of the Forest Practices Board and the Forest Practices System. These included:

- the degree of transparency of the operations of the Forest Practices Board, examples related to the failure to gain access to Forest Practices Plans contrary to the provisions of the Forest Practices Code;
- a perception that the Forest Practices Board is selective in the release of details of the Forest Practices Plans;
- a perception that the Forest Practices Board is comprised of people whose interests coincide with that of the industry;
- an assertion that the pricing policy for access to Forest Practices Plans was designed to prevent access to plans by particular constituents;
- that neighbours were prevented from having access to Forest Practices Plans for forest practices operations on adjacent properties potentially impacting on their boundary; and
- that access to information on approved Forest Practices Plans was difficult.

The Commission received a number of submissions on the Draft Recommendations Report expressing concern that the Commission was proposing that Forest Practices Plans be made publicly available through a central access point. Submitters in written submissions and at hearings were concerned that the central access point would lead to harassment of Forest Practices Officers by concerned members of the community. Submissions also stated that the *Good Neighbour Charter* is appropriate and adequate to provide sufficient transparency about forest practices.

Self-regulation

A number of submitters raised issues relating to industry self-regulation of the Forest Practices Code. Evidence was given to support the contention that the system is vulnerable when the same person has responsibility for initiating, approving, implementing and verifying compliance with Forest Practices Plans. Submissions were received expressing concerns that Forest Practices Officers, employed by companies that enjoyed near monopoly status in the industry, were in an invidious position when it came to enforcing the provisions of the Forest Practices Code against the interests of their employers. A submission referred to 'a system that invites corruption.' However, even as a result of direct questioning by the Commission at the hearings, no evidence of corruption was tendered, and the submitters gave advice that no complaints had been made to the Police.



Adequacy of resources to support the Forest Practices Code

In Attachment 10.10 of the RFA the State agreed to ...*continuing to adequately resource the system surrounding the Forest Practices Code (including compliance, implementation, education, training, review, research) and maintaining appropriate contributions by industry to ongoing management costs associated with the Code.*

In a number of representations to the Commission it was asserted that the resources available to the Forest Practices Board are not adequate to:

- support an effective response to the requirement for information on forest values;
- respond effectively to complaints about Forest Practices Plans and their implementation;
- properly train forestry operatives in the field;
- take on the added responsibilities of the Forest Practices Board as a consequence of the amendments of the *Forest Practices Act 1985* (Tas), relating to native forest clearing;
- check on compliance with Forest Practices Plans; and
- effectively prevent unauthorised firewood harvesting.

The Commission received a submission in response to the Draft Recommendations Report on the issue of financial resources to support more effective communication of the work of the Forest Practices Board. It specifically advocated that any further funding should be provided outside of industry. A further submission was received recommending additional funding for the research functions of the Forest Practices Board be sourced from outside industry.

Forest Practices Plans to specify best practice reforestation standards and appropriate management prescriptions for threatened species

Attachment 10.12 of the RFA commits the State to:

- include specific provisions in the Forest Practices Code to require Forest Practices Plans to specify best practice reforestation standards and to provide for monitoring; and
- include in the Forest Practices Code a requirement for conditions in timber harvesting plans (Forest Practices Plans) that ensure appropriate management prescriptions for endangered species.

A number of general comments were received about the perceived failure of the Forest Practices System to protect threatened species, and a number of complaints about alleged breaches of the threatened species provisions contained in Forest Practices Plans. These have been discussed in section 4.2.3 below on alleged breaches of the Forest Practices Code and compliance audits.

Compliance with the Forest Practices Code

There were a number of examples given in submissions on the Background Report, on the Draft Recommendations Report and at hearings, of alleged breaches of various provisions of the Forest Practices Code. These included provisions relating to:



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- use of poisons;
- landscape;
- threatened species management;
- notification of neighbours;
- failure to abide by provisions of Forest Practices Plans;
- streamside reserves; and
- road construction standards, and many others.

At the hearings the Commission sought evidence from the Forest Practices Board on the process it adopts in addressing complaints of alleged breaches of the Forest Practices Code. The Commission was advised that all complaints are recorded and investigated, and the results of the investigations are reported back to the complainant and to the Parliament. Some complaints are anonymous but all are investigated.

The Commission was advised that there are about 1,000 Forest Practices Plans certified each year, and approximately 120 complaints per year. Of those 120 complaints, members of the public make approximately 40, and the balance are made by Forest Practices Officers. Approximately 60 per cent of complaints are found to be breaches of the Forest Practices Code. However, 80 per cent of the complaints made by the public were found not to be breaches of the Forest Practices Code. This indicates that there is a gap between public perception of what constitutes a breach of the Forest Practices Code, and the Forest Practices Board's interpretation of the Forest Practices Code.

Continuous improvement

Submissions on the Background Report, the Draft Recommendations Report and at the hearings expressed concern as to the adequacy of the Forest Practices System and its capacity to adapt to new information and research.

4.2.3 Analysis

Compliance audits

The Forest Practices Board conducts independent audits of Forest Practices Plans on both private and public forest and publishes the results in its Annual Report. It also investigates all breaches of the *Forest Practices Act 1985* (Tas) and publishes a report on these in the annual report.

When the Reserve Management Code of Practice is completed the State intends that reports on annual compliance with the Reserve Management Code of Practice will be made public (see section 4.5 and 4.20).

The Commission finds that the commitments made under Clause 94 have been met.



Transparency of process

The Commission is concerned that neighbours and other interested Parties sometimes find it difficult to access information about approved forest operations. There is a perception among sections of the community that the system deliberately makes access to information difficult, that people are referred from one person to another without satisfaction, and that the industry has a propensity to be covert about its intentions.

At the hearings the Commission sought advice from the Chief Forest Practices Officer on a number of issues including the release of information in Forest Practices Plans to members of the public. The Forest Practices Board's policy provides for effective and efficient communication of information in the Forest Practices Plan to stakeholders. The Forest Practices Board considers it is desirable for the proponent or a Forest Practices Officer, to meet with stakeholders and enter into a dialogue to explain aspects of a Forest Practices Plan and how it relates to the Forest Practices Code.

The Commission considers that, while it is desirable to facilitate exchange of information between the party seeking information about a Forest Practices Plan and the landholder or landholder's nominee, this is not always a practical proposition. There are often situations where neighbours are in dispute over contentious issues, and strained relationships between the Parties can make this particular requirement of the current policy unworkable. It is clear that some people consider their requests for information are being deflected and that this practice contributes to the perception of a system that is intent on denying access to information.

It is also clear that there is confusion in the community over the roles and responsibilities of the Forest Practices Board and those of the industry. This confusion has contributed to the issues raised by submitters in this review. A clearer articulation of the different roles and responsibilities of the industry, the Forest Practices Officers and the Forest Practices Board would dispel some of the concerns with transparency and assist in ensuring the public are aware of where to go to get relevant information.

The Commission considers that there is room to make the process for obtaining information on the content of Forest Practices Plans more transparent, and to make the industry more accountable to the public for undertaking its responsibilities for public consultation. It is critical that industry accepts responsibility for providing information on planned activities and that it engages its neighbours and the local community in a consultative manner to deal with any issues or concerns. This is an important responsibility of industry, and one that should not be transferred to Government. Forest managers should make Forest Practices Plans available at a cost that is not a barrier to information exchange.

The Commission considers that it would be prudent to establish a central access point (eg a website) that provides location and nature of operation of Forest Practices Plans. Most importantly, the site needs to provide details to enable contact with the responsible officer for more information. The website should be used to foster engagement between industry and the community. It could also flag the processes for community members to pursue if they feel aggrieved or wish to lodge a complaint.

The State amended the *Forest Practices Act 1985* (Tas) in 1999 to formally separate the Forest Practices Board from Forestry Tasmania, and establish the Forest Practices Board as an independent

statutory authority. The membership of the Forest Practices Board was changed to remove the position held by the Managing Director of Forestry Tasmania and include two new positions with expertise in local government, and harvesting and processing of timber. The Commission finds that this fulfils the Parties' intent in Attachment 10.9.

The Commission notes that there is no specific position on the Forest Practices Board for a member who would bring to the Board experience in ecology and/or conservation. The Commission considers that such a position would contribute to greater confidence in the independence and expertise of the Forest Practices Board (see Recommendation 4.1).

Self-regulation/Co-regulation

For issues raised by submitters relating to the self-regulatory nature of the Forest Practices System, the Commission notes that in Clause 65 the Commonwealth accredited the Tasmanian Forest Management System in accord with Clauses 62-64, 93, 94 and Attachments 10 and 11. Clause 94 provides for annual compliance audits of the *Forest Practices Act 1985* (Tas) and the Forest Practices Code. It also provides for five yearly independent expert reviews of the Forest Practices System. These commitments are discussed under *Continuous Improvement* below.

The Background Report details annual compliance audits undertaken by the Forest Practices Board. It describes a co-regulatory system rather than a self-regulatory system, with independent monitoring and enforcement by the Forest Practices Board of the self-regulatory component of the forest industry. It also reports on an independent expert review of the compliance auditing procedures undertaken by Mr Clynt Wells. The report found that the audit system was a comprehensive system for managing self-regulation, that audit procedures follow generally accepted protocols, and that the sampling procedures were appropriate.

The Commission finds that, though there is significant disquiet about the self-regulatory nature of the Forest Practices System, an independent review of compliance auditing procedures has found that it is appropriately structured and operated at an appropriate level.

The Commission notes that there are procedures in place to undertake five yearly reviews of the Forest Practices System that provides opportunity to address any short-comings arising from the self-regulatory nature of the Forest Practices System, and has identified this as an issue in Recommendation 4.1.

Adequacy of resources to support the Forest Practices Code

The Commission notes the substantial direct and 'in kind' contribution made by industry to support the Forest Practices System, as detailed in evidence provided by the Forest Practices Board at the hearings.

The Commission recognises that there was considerable disquiet concerning the regulatory activities of the Forest Practices Board, and the lack of effective communication about the respective roles of the industry, and the Forest Practices Board, expressed in submissions to the review. Submissions on the



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Background Report and subsequently in hearings asserted that there was a lack of resources available to undertake this communications function.

The Commission notes that many of the complaints about the Tasmanian Forest Practices System may be motivated by strongly held beliefs on aspects of the forest industry and are therefore not amenable to resolution, short of cessation of logging. A number of submissions expressed the view that there was a general lack of confidence in the wider community with the Forest Practices System. A contrary view was put to the effect that the Forest Practices System was working well. This divergence of views reflects the divergence between those who support the RFA and those that do not.

The Commission notes that a common thread in submissions to the review was the inability to distinguish between the Forest Practices Board and the forest industry and their respective roles and responsibilities.

The Commission notes that key information inputs to the Forest Practices System include information on threatened species and draws attention to the discussion in section 4.6.2. The Commission recognises the importance of the industry to the economy of the State, and questions whether adequate resources are available to support the Forest Practices System as the regulators of Ecologically Sustainable Forest Management in Tasmania's commercial forests.

The summary of resources available to the Forest Practices Board contained in the Background Report, and the important contribution made by industry to the operations of the system are noted. Evidence was given by the Chief Forest Practices Officer that the Forest Practices Board is adequately resourced for its forest industry inputs, scientific and specialist functions and for undertaking its functions as the independent regulator. The Commission notes the two exceptions cited by the Chief Forest Practices Officer as:

- the reduction in research funds – research into improved forest management systems underpins the philosophy of continuous improvement, and is required to help find solutions to the more intractable problems; and
- the important area of communication with the public towards a better understanding of the Forest Practices System.

In the past five years there has been a substantial increase in the number of Forest Practice Plans, increased complexity of the Forest Practices Code, and legislation conferring additional responsibility on the Forest Practices Board. During the same period the resources available to the Forest Practices Board have increased substantially except for the important areas of communication and research.

Notwithstanding the submissions advocating further funding for communication and research should come from outside industry, the Commission considers that the financial resourcing of these Forest Practices Board responsibilities is an industry responsibility.

In general, the Commission considers that the Forest Practices System is adequately resourced with the exception of communication and research functions as addressed in Recommendation 4.1.



Forest Practices System to specify best practice reforestation standards and appropriate management prescriptions for threatened species

The Background Report provides evidence that the Forest Practices Code was amended in 1999 to incorporate the relevant provisions to satisfy the above commitments. These provisions provide for monitoring of standards and a process for identification of threatened species values, nomination of appropriate prescriptions and ensuring compliance with the prescriptions.

The Commission finds that the commitment in Attachment 10.12 of the RFA has been discharged. Sections 4.6 and 4.7 provide further discussion on issues associated with prescriptions for managing threatened species.

Compliance with the Forest Practices Code

The Commission received submissions on the Background Report, Draft Recommendations Report and at the hearings that indicated that breaches of the Forest Practices Code had occurred. It also received submissions where it was clear that there was a misunderstanding over the meaning of the Forest Practices Code, or a gap between the interpretation of the Forest Practices Code by the complainant and the Forest Practices Board. The Commission noted that, while some were, some of the complaints of breaches of the Forest Practices Code were not referred to the Forest Practices Board.

The Commission notes the unambiguous policies of the Forest Practices Board on the investigation and reporting of complaints and is satisfied that this system is working effectively. However, submissions to the Commission on compliance with the Forest Practices Code demonstrated that many submitters were unaware of the relationship of the Forest Practices Board and the Forest Practices Officers in the field, and were unaware of how to go about registering a complaint. Other submissions received on the Background Report, the Draft Recommendations Report and in the hearings illustrated that some sections of the industry are not clear about their obligations under the Forest Practices System and the Forest Practices Code, particularly to effectively consult with neighbours and members of the public about their forest operations.

The Commission's Terms of Reference do not extend to conducting an inquiry into alleged breaches of the Forest Practices Code. Nevertheless, the Commission is of the view that there is room for improved measures to enable effective communication of the roles and responsibilities of the participants in the process, and the rights and expectations of the public, in particular of neighbours, to information about authorised forest operations and complaints procedures.

Continuous improvement

Clauses 88, 89 and 94 of the RFA all express the intent of the Parties to ensure continuous improvement of the research base of forest management systems. Part of this process is to undertake, publish and make publicly available the annual compliance audits, and five yearly independent reviews of the operations of the Forest Practices Code and Reserve Management Code of Practice referred to above.



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The independent expert review of the Forest Practices Code (chaired by Dr Peter Davies) was released for public comment, and a summary of the comment received, together with a response from the expert panel was published in April 1999 (Davies et al. 1999). In 2000 a draft revised Forest Practices Code was released for public comment. A revised Forest Practices Code (2000) took effect on January 2001 and is publicly available from the Forest Practices Board. Releases of these publications are in accord with Clause 94 RFA and fulfil the State's commitment for the review period.

Elements of the Forest Practices Code have been subjected to independent expert review as part of a routine approach to continuous improvement. These reviews have contributed to revision of the Forest Practices Code through the public process of advertising drafts and receiving public comment. The reviews have canvassed the following provisions of the Forest Practices Code:

- steep country provisions;
- soil and water provisions;
- safety provisions; and
- auditing provisions.

The Commission notes that, with no evidence to the contrary, the relevant commitments have been undertaken to the extent reported in the Background Report.

The Commission also considers that improvements in the training, education and accreditation of forest operators would provide a substantial improvement in the accountability of, and public confidence in, the Forest Practices System. Such developments will need to be supported by the industry through funding the necessary activities.

The Commission gave a great deal of consideration to the issues raised about the role and function of the Forest Practices System and the Forest Practices Board. It is apparent that the role of the Forest Practices Board in the implementation of the Forest Practices System is not well understood in the broader community. Concerns raised by a number of representations would be answered if the Forest Practices System were explained in easily digestible information.

While the measures identified in the RFA on the implementation of Ecologically Sustainable Forest Management are intended to provide improved involvement by, and communication with, the community, it is evident that sections of the community remain suspicious, untrusting and disenfranchised by existing consultation and communication mechanisms commonly used within the Forest Practices System. The Commission also notes that as advised by the Chief Forest Practices Officer in his submission, complaints are lodged about elements of the Forest Practices System, which are subsequently proven to be without foundation, and no amount of consultation will satisfy some of these complainants.

In recent years, industry leaders have realised the importance of engaging the community. Public companies are moving to improve corporate governance systems to ensure the highest ethical standards are implemented, including standards of environmental performance and social engagement. Government Agencies, and industry involved in implementing the Forest Practices System should objectively review their practices, and develop the highest standards of ethical practice for both their environmental performance, and in their engagement with the community.



Recommendation 4.1

That the State improves the accountability of the Forest Practices System. Issues to consider include:

- improving transparency and communications, in particular, public access to information on Forest Practices Plans, through a central access point designed to improve industry consultation with neighbours and local communities;***
- improving on ground implementation of Forest Practices Plans by introducing minimum standards of training, education and accreditation of forest operatives, and introducing systems to convey the detail of the Forest Practices Code and Forest Practices Plans in a form readily available and understandable to forest operatives;***
- improving public understanding of the Forest Practices System including the Forest Practices Code, the role of the Forest Practices Board and, in particular, the public and legal policy framework in which the Forest Practices Board operates;***
- providing for a specific position on the Forest Practices Board for a person with ecological and/or conservation expertise;***
- reviewing the efficacy of the self-regulatory aspects of the Forest Practices System in the next five year review of the Forest Practices System; and***
- ensuring provision of additional funding, including from industry, to support the communication and research functions of the Forest Practices System.***

4.3 Management plans

4.3.1 Background

In Attachment 10.8 of the RFA Tasmania committed to: *Ensuring that management plans are implemented for all State Forest and National Parks by the year 2000, and all reserves within the Formal Reserve System by the year 2003 or as soon as practicable thereafter. Management plans are to include objectives and be periodically reviewed to assess performance against each objective.*

The Background Report details the progress in completion and implementation of these management plans.

Attachment 10.13 requires that management plans for formal and informal reserves clearly identify the Comprehensive, Adequate and Representative values and actions being taken in each reserve to appropriately manage the values.

Attachment 6.17 and 6.20 require the State and Commonwealth respectively to include new Informal Reserves in new and revised management plans by the year 2000.

Generic management plans for categories of reserves will be produced by the Department of Tourism, Parks, Heritage and the Arts.



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Sustainability Indicator 7.1.c details the opportunities for the public to comment on management plans for State Forest, and public reserves within a broader planning context.

4.3.2 Issues

Issues raised in submissions to the Background Report, and the Draft Recommendations Report, and the hearings concerning management plans were:

- that all Comprehensive, Adequate and Representative reserves do not yet have management plans;
- how management plans are being implemented; and
- that the Comprehensive, Adequate and Representative values in reserves are not being effectively managed by, or documented in management plans.

4.3.3 Analysis

The RFA does not require management plans to have been completed for all Comprehensive, Adequate and Representative Reserves at the time of this review. The Background Report reports that management plans are in place for all state forest and for 13 of the 18 National Parks. Three other National Parks have draft plans on public exhibition. The remaining two plans are on hold pending resolution of policy issues relating to Aboriginal community involvement in management of these particular National Parks.

The Commission notes that there has been some slippage against the milestone for the preparation and finalisation of National Park management plans. Progress has been made towards having management plans in place for all formal reserves by 2003.

The Commission notes that all management plans for State Forests document the Comprehensive, Adequate and Representative values and have objectives and prescriptions for their management. Some management plans for reserves under the *National Parks and Wildlife Act 1970* (Tas) have documented the Comprehensive, Adequate and Representative values and have objectives and prescriptions for their management, whilst some of the older management plans have not. The Commission considers that this requirement should be addressed, as older management plans are reviewed and new management plans prepared.

An issue to be considered and resolved by the next review of the RFA is how performance of management plans is to be assessed, and periodically reviewed, in meeting the objectives, maintenance, protection and/or conservation of Comprehensive, Adequate and Representative values depending on land tenure requirements (Attachment 10.8). It is noted that management plans for State Forests are currently reviewed annually to ensure they are meeting the objectives contained therein, and these reports are made available for public comment.

The Commission also notes that new Informal Reserves were included in new and revised management plans.



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The Commission concludes that while the commitments in Attachments 10.8, 10.13 and Attachments 6.17 and 6.20 have been substantially met there is still some work required to complete the outstanding management plans and identify appropriate comprehensive, adequate and representative values and management actions.

4.4 Nature Conservation Strategy

4.4.1 Background

The State agreed to develop and implement a Biodiversity Strategy, Attachment 10.3, by 31 December 1999. The Background Report provides information on the preparation of a draft Nature Conservation Strategy by the State Biodiversity Committee in June 2001 and its release for a period of public comment. The Committee has considered public comment and submitted a draft to the Minister for his endorsement.

4.4.2 Issues

Concern has been expressed that the milestone has not been met and that the Nature Conservation Strategy has not yet been adopted or implemented.

4.4.3 Analysis

The Commission finds that the milestone has not been met and recommends that the State complete this commitment as a matter of priority.

Recommendation 4.2

That the State completes the Nature Conservation Strategy and commences implementation of the Strategy by 30 June 2003.

4.5 Code of Practice for reserve management

4.5.1 Background

The State agreed, Attachment 10.11, to *Developing and implementing by the year 2000, a code of practice for reserve management to cover all environmental practices, including guidelines concerning erosion risk from roads and tracks within reserves*. Once implemented the State is required to annually publish a report on compliance with the code. The Background Report advises that a draft Reserve Management Code of Practice was released for public comment late in 2001.



4.5.2 Issues

The only issue raised in submissions related to the concern over the failure to finalise and implement the code of practice for reserve management.

4.5.3 Analysis

The Commission notes that the draft Reserve Management Code of Practice has been released for public comment. However the Reserve Management Code of Practice has yet to be completed and implemented. The Commission finds that the milestone has not been met and recommends that appropriate resources be devoted to the adoption of the Reserve Management Code of Practice and its implementation, including compliance audits.

Recommendation 4.3

That the State completes the Reserve Management Code of Practice and commences implementation of the Code by 30 June 2003. That the State undertakes annual reporting on compliance with the Reserve Management Code of Practice.

4.6 Threatened species and communities

4.6.1 Background

The undertakings of the Parties under the RFA for threatened species occur in several parts. Those relating to the development and implementation of the Threatened Species Protection Strategy, Recovery Plans, and Threat Abatement Plans, for threatened species and Forest Communities listed under either Commonwealth or State legislation, are contained in Clauses 30-38 inclusive, Clause 70, and Attachment 10.3 and are discussed below. Those relating to protection and management are contained in Clauses 68-71 are discussed under section 4.7 – Protection of Priority Species. The agreed recovery action status for relevant threatened species listed under either the *Threatened Species Protection Act 1995* (Tas) or the *Endangered Species Protection Act 1995* (Cth) is contained in Attachment 2 of the RFA. Since the signing of the RFA, the *Endangered Species Protection Act 1995* (Cth) has been repealed and replaced by the *Environment Protection and Biodiversity Conservation Act 1999* (Cth), therefore, any reference to the old Act within the RFA is to be read as a reference to the new Act. Sustainability Indicators 1.2a and 1.2b provide data relevant to the status of threatened species.

Under the RFA the Parties agree to jointly fund and prepare any new or revised Recovery Plans in instances where a threatened species is listed under both the Tasmanian and the Commonwealth Acts. Such Recovery Plans were to be implemented co-operatively by the Parties to ensure that the requirements of both Acts were met.



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For those species listed under either the Tasmanian or the Commonwealth Act, the Parties agree to seek to improve the outcomes of the Recovery Plans by developing, where appropriate, multiple species Recovery Plans.

For Forest Communities restricted to Tasmania that are listed under the Commonwealth Act, the Parties agreed that they would jointly prepare any new National Recovery Plans. The Commonwealth also agreed to continue to consult with Tasmania on the preparation of Threat Abatement Plans for relevant key threatening processes.

The Commonwealth agreed to adopt, under their Act, any State Recovery Plan that relates to a nationally listed species restricted to Tasmania and meets the requirement of the Commonwealth Act.

The Parties agreed that where possible, for those threatened species, threatened Forest Communities or threatening processes that extended beyond Tasmania, they would jointly prepare with other relevant governments the following:

- National Recovery Plans for species and forest communities; and
- Threat Abatement Plans for threatening processes listed under the Commonwealth Act.

It was further noted that the Commonwealth intended to incorporate as the Tasmanian component of a National Recovery Plan, any relevant State Recovery Plan or Threat Abatement Plan prepared pursuant to the Tasmanian Act.

The Parties formally recognised that priorities relating to threatened species and communities change in light of new information, and undertook to continue to consult one another on the priorities for the following:

- listing threatened species, Forest Communities, and threatening processes; and
- the preparation of relevant Recovery Plans and Threat Abatement Plans.

4.6.2 Issues

There was little public comment on the RFA provisions with respect to preparation and implementation of Recovery Plans for threatened species.

Comments included:

- there has been little action in preparing new Recovery Plans, revising existing ones and implementing recovery actions;
- Recovery Plans are not working;
- some threatened species have become more at risk in the last five years;
- no clearing of threatened Forest Communities should be allowed under the policy on maintaining a Permanent Forest Estate;
- the Threatened Species Protection Strategy required in Attachment 10.3 was published late, and has not been implemented; and
- threatened Forest Communities should be listed under Tasmanian legislation.



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A submission was received by the Commission in response to the Draft Recommendations Report expressing concern that the Proposed Recommendation 4.2 (now Recommendation 4.4) may be unrealistic, noting that there are some 560 species that may be caught by this Proposed Recommendation.

4.6.3 Analysis

Progress has been made towards the preparation of Recovery Plans in the last five years, in accord with the RFA commitments. Since 1996, 13 Recovery Plans have been prepared. Eight multiple-species Recovery Plans were prepared and these have provided a more cost-effective approach. The Commission notes that the RFA provides no milestone for the rate of completion of these Recovery Plans.

There are many forest-based threatened species that are still to have Recovery Plans prepared. The Commission notes that the current resources available from Governments for the preparation of Recovery Plans has constrained the ability to complete plans for all species that warrant or require plans.

Of the more than 600 listed threatened species (fauna and flora, forest and non-forest) currently in Tasmania, only about 40 are presently covered by Recovery Plans. Most funding for preparation and implementation of these Recovery Plans has come from the Commonwealth Government for endangered and vulnerable species listed under the Commonwealth Act, with in-kind support from the State Government. Similarly, few species listed solely under the Tasmanian Act currently have formal Recovery Plans prepared (this is not required under Tasmanian legislation). However, the Commission notes that as the Commonwealth and Tasmanian Acts have similar criteria for listing threatened species. Therefore, many of the species listed under the Tasmanian Act would probably meet the criteria for listing under the Commonwealth Act if they were formally nominated. At current rates of preparation it would appear unlikely that Recovery Plans could be prepared for all those species for which it would be desirable for many years. To address this issue the Commission makes Recommendation 4.4 below.

The Commission notes the submission on the Draft Recommendations Report questioning Proposed Recommendation 4.2, and draws attention to the fact that Proposed Recommendation focuses on 'endangered' forest related threatened species.

The Commission has been advised that the Threatened Species Unit in the Tasmanian Department of Primary Industries, Water and Environment is giving priority to the preparation of Listing Statements for all threatened species in Tasmania. Listing Statements contain information about the species, its distribution, threats, management issues and recovery actions needed. They are, in effect, a simplified Recovery Plan. Listing Statements are in place for most threatened fauna species and are contained in the Threatened Fauna Handbook. Listing Statements for threatened flora species are being prepared as part of the Threatened Flora Handbook, which will be completed within 12 months. The RFA does not mention preparation of Listing Statements as a commitment, but it would seem appropriate if recognition were given to these as part of the suite of actions to be implemented for the management of threatened species. Accordingly, the Commission makes Recommendation 4.5.



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The status of threatened Forest Communities under the policy on maintaining a Permanent Forest Estate is discussed in section 4.12.

The RFA identified threatened Forest Communities and provides for their protection on public land (through Attachment 6), and on private land (through the Private Comprehensive Adequate and Representative Reserve Program). The Tasmanian *Threatened Species Protection Act 1995* (Tas) does not contain provisions for the listing of vegetation communities under the Act. The Tasmanian Threatened Species Strategy 2000 proposes that the legislation be amended to permit threatened communities to be added. The Commission concurs with the view that the protection of threatened Forest Communities should be provided through an appropriate statutory framework and accordingly makes Recommendation 4.6. The Commission notes that the term threatened Forest Communities is not defined in the RFA. The Commission understands that the term refers to those Forest Communities identified through the agreed JANIS criteria. The JANIS criteria refer to those Forest Communities considered endangered, vulnerable, rare, and rare and depleted old growth. The term would also include any communities listed as critically endangered, endangered or vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

The Commission finds that the Parties have made satisfactory progress towards milestones and commitments in relation to Clauses 32-37.

Under Attachment 10 of the RFA, the State clarified its intention to further improve its Forest Management Systems across forest management agencies, and land tenures by committing to a number of actions. One of these actions, at Clause 3, was to develop and implement a Threatened Species Protection Strategy by 31 December 1998. The State published the *Threatened Species Strategy for Tasmania* in December 2000, two years late. A number of actions outlined in the Strategy have been implemented since the first draft was published in 1999. However, a number of critical actions for implementation have not been undertaken (eg no significant progress towards the development of an implementation plan or preparation of a budget plan outlining resources required for implementation).

The Commission considers that more progress should have been made towards implementing critical actions in the Strategy, and recommends that resources be committed to ensure the implementation of key actions under the Strategy, as a matter of urgency.

Recommendation 4.4

That the Parties complete the preparation of Recovery Plans for all endangered forest-related threatened species within the next five years. Where species listed under the Tasmanian Act meet the criteria for listing under the Commonwealth Act, both Parties should contribute funding.



Recommendation 4.5

That the Parties accredit Threatened Species Listing Statements as an alternative to Recovery Plans for listed threatened species, and as providing for adequate management of listed threatened species under the RFA.

Recommendation 4.6

That the State provide for the protection of threatened Forest Communities through an appropriate statutory framework.

Recommendation 4.7

That the State provide sufficient resources, including financial resources to be allocated in the 2003-04 Budget, to ensure that the implementation of the Threatened Species Strategy for Tasmania is carried out in an effective and timely manner.

4.7 Priority species

4.7.1 Background

Clauses 68-71 inclusive of the RFA contain the agreements and obligations of the Parties as they relate to the protection of Priority Species, being those listed in Attachment 2 (Part A) of the RFA.

Under these Clauses, Tasmania agrees to protect the Priority Species listed in RFA Attachment 2 (Part A) through the Comprehensive, Adequate and Representative reserve system, or by applying relevant management prescriptions. Tasmania also undertook, where practical, to assess the species listed in Attachment 2 (Part B) of the RFA to determine management requirements in accord with the terms of Clause 96 of the RFA. This assessment was to occur prior to the first five year review of the RFA.

Both Parties agreed to implement, as a matter of priority, the management prescriptions or actions identified in jointly prepared and agreed Recovery, or Threat Abatement Plans. The Parties also recognised that the Priority Species may change and that new or amended management controls may be needed during the life of the RFA. Such changes could be brought about by changes in the status of species, additional information and evolving forest management practices. The Parties further agreed that any alterations would be made pursuant to the processes set out in Clause 96 of the RFA.

Clauses 96 and 97 commit Tasmania to confirming that management prescription information will be developed to adequately maintain Priority Species in Attachment 2 (as periodically reviewed), be based on sound science, be endorsed where relevant by the Tasmanian Threatened Species Scientific



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Advisory Committee, and take note of public comment. The Management Prescriptions Database and Response to Disturbance Database were to be maintained, updated and used for updating appropriate State management documents.

Sustainability indicators for the conservation of biological diversity were broken down under two sub-criteria: ecosystem diversity and species diversity. The species diversity sub-criterion tracked the presence, status and population levels of forest dwelling species by reporting on representative species from a range of habitats. Part of this sub-criterion tracked the status of forest dwelling species at risk, drawn from the Priority Species list.

The Background Report advises that the changes to the Priority Species list are a consequence of the changes to lists under the *Threatened Species Protection Act 1995* (Tas) as follows:

- 44 flora species and 21 fauna species had their status changed;
- of the 44 flora species, 16 were added to the list and classified as either rare or endangered under the *Threatened Species Protection Act 1995* (Tas), a further 22 (wrongly reported in the Background Report as 20) were moved to a higher risk category, one species was moved to a lower risk category, two species were delisted, and three species previously thought extinct were rediscovered;
- of the 21 fauna species, 10 were added to the list and classified as either vulnerable, rare or endangered under the *Threatened Species Protection Act 1995* (Tas), a further seven were moved to a higher risk category, two species were moved to a lower risk category, one species was delisted, and one species previously thought extinct was rediscovered; and
- 17 forest-dwelling flora species, of which 11 are orchids, were reclassified from endangered to critically endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

When viewed in isolation, the data indicate a worsening trend in the risk status of forest-dwelling species, as defined under this indicator. However, it is important to clarify the reasons behind some of the new listings and risk category upgradings. On the one hand, the data is a reflection of increased knowledge and new information gained during the last five years.

For example, 11 of the flora species that were moved to a higher category of risk are orchids. The change in status regarding these orchids was due to a combination of taxonomic changes and collation and reinterpretation of old records. The vast majority of the 26 species added to the Priority Species list (excluding the rediscovered species), were included on the basis of new information. The Department of Primary Industries, Water and Environment and the Forest Practices Board have good systems in place for sharing new information and including this information in relevant databases. Both entities have increased resourcing aimed at providing specialist advice on threatened species matters (especially for snails and beetles). New and detailed studies have been conducted on broad distribution and populations. As a result, 1996-97 information has been significantly updated. In addition, two species that were added to the Priority Species list were newly discovered in Tasmania (*Mirbelia oxyloboides* and *Leucopogon virgatus* var. *brevifolius*). A few have also been newly described (*Hoplogonus bornemisszai* and *Hoplogonus vanderschoori*).



4.7.2 Issues

Public comments on these commitments centred mainly on the adequacy of current reservation and management prescriptions to protect threatened species. Comments made included:

- more threatened species were now listed, and that some species had become more threatened, concluding that the agreed arrangements were therefore inadequate;
- not enough threatened species habitat is reserved or the amount reserved is unknown;
- the habitat of some threatened species has been logged since the RFA;
- forestry has been made exempt from the provisions of the *Threatened Species Protection Act 1995* (Tas);
- it is unclear if the Scientific Advisory Committee endorsed changes to the list of Priority Species in Attachment 2 Part B as of the RFA required by Clause 96(c); and
- changes to management prescriptions for species incorporated into the Forest Practices Board's Threatened Fauna Adviser appear to have occurred without public consultation as required by Clause 96 (d).

4.7.3 Analysis

The issues raised in submissions on the Background Report and at hearings about the area of habitat protected under the RFA or that habitat has been logged are not within the Commission's Terms of Reference to review progress with implementation of the relevant commitments.

For concerns about the increase in the number of species listed, and the number of species moved to a higher risk category, the Commission, based on information provided in the Background Report, makes the following observations. The data for species with an upgraded risk status (29 species) can also be attributed, in the main, to increased knowledge and new information, as with the three species that were delisted, and the three that were downgraded to a lower risk category. Of the 17 species reclassified from endangered to critically endangered, under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth), 12 were also listed on the *Threatened Species Protection Act 1995* (Tas) schedules and part of the group that were upgraded under that Act. Upgrading to a higher risk status under the Tasmanian Act can also be attributed mainly to increased knowledge and new information.

However, a range of causal factors have also been identified in the Background Report that also contributed to the worsening trend in the risk status of forest dwelling species. These factors include:

- the effects associated with mining;
- the effects associated with clearing for agriculture;
- introduced species;
- *Phytophthora cinnamomi*; and
- fire and drought.

Many of these species are also potentially threatened by forestry activities. Forestry related habitat disturbance, modification and removal, is a known cause of species decline and may have contributed



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to the indications of worsening trends in the risk status of forest-dwelling species during the last five years. Forestry operations also contribute to the spread of *Phytophthora cinnamomi*, although both *Phytophthora cinnamomi* infested and susceptible areas are identified on State Forest and managed to minimise the risk of spread. Forest Management Systems take into account, wherever practicable, prescription communities/habitat as identified under the RFA and provide for species protection through the Forest Practices Plan process. Threatened species (individuals and populations) are protected to varying degrees in this way.

The Sustainability Indicators Report recommends further monitoring of the effectiveness of current forest management practices to build on the work of Mooney and Holdsworth (1991). The Commission concurs with this recommendation as a way of identifying areas for improvement in threatened species management and protection. The adoption of relevant recommendations throughout this RFA five year review report should help to further limit the decline in the status of forest-dwelling species at risk of not maintaining viable breeding populations.

The RFA provides for management of Priority Species habitat through the agreed Comprehensive, Adequate and Representative reserve system, and the application of management prescriptions developed through the State's scientific processes, which are improved as new information comes to hand. The vast majority of Priority Species are currently listed as threatened under the State and/or Commonwealth Acts, and are therefore subject to legislated requirements for management.

The Commission has been advised by the Tasmanian Government that the Scientific Advisory Committee endorsed changes to the list of Priority Species in Attachment 2 Part B of the RFA as required by Clause 96(c). The Commission was advised by the Forest Practices Board that the Threatened Fauna Adviser is a complex operational planning and management tool, that incorporates the management prescriptions for threatened fauna species, that have been developed over many years by a large number of scientists who are experts in their field. The Scientific Advisory Committee has endorsed the prescriptions, as has the Forest Practices Advisory Council that has representatives from private landowners, forest managers, local government and the forest science community.

For Clause 96(d), the Commission notes that the RFA does not prescribe how public consultation on management prescriptions should occur. While consultation has occurred on what is essentially a technical scientific issue with a limited number of interested stakeholders, it appears that the process for community consultation on changes to prescriptions for management of Priority Species has not always been full and open to the public. The Commission recommends that the State subject future substantive changes to management prescriptions for Priority Species to public consultation and take note of public comment.

The Commission notes the concern that forestry, and in particular Forestry Tasmania, has been made exempt from the provisions of the *Threatened Species Protection Act 1995* (Tas) is unfounded. Threatened species habitat, on land subject to forestry operations, is managed through application of the relevant management prescriptions and procedures under the Forest Practices Code. Changes made to the *Threatened Species Protection Act 1995* (Tas) in 2001 amended the administrative arrangements under which forestry operations operate. These recognise that the Forest Practices Code requires that threatened species in forestry areas are managed in accord with requirements of the Act,



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and management prescriptions endorsed by the Threatened Species Unit. However, it is important to note that there is no absolute requirement in the RFA or in relevant legislation for all Priority Species habitat to be protected from logging. Indeed, evidence provided by the Forest Practices Board suggests that there are some Priority Species that are unaffected or can be favoured by logging disturbance.

The Commission notes information provided in the Background Report relevant to meeting the commitments contained in Clauses 69 and 70.

The Commission is generally satisfied that the Parties have made satisfactory progress towards milestones and commitments in relation to Clauses 68-71, 96 and 97.

Recommendation 4.8

That the State subject future substantive changes to management prescriptions for Priority Species to public consultation and take note of public comment.

4.8 National Estate values

4.8.1 Background

The Commonwealth-Tasmanian joint study of National Estate in Tasmania identified and assessed National Estate values in forests throughout Tasmania, as documented in the RFA background report *National Estate Report* (Public Land Use Commission, 1997c). The information from this extensive and systematic study was used to underpin commitments in Attachment 1 of the RFA relating to National Estate. In general, these commitments relate to administrative and process related undertakings, designed to further secure and improve the current management and protection of National Estate values in Tasmanian forests. In Clause 26 of the RFA the Parties agreed to the management of National Estate values as set out in Attachment 1 of the RFA.

4.8.2 Issues

A comparatively small number of public submissions raised issues related to National Estate. Of the matters raised, many were outside the Terms of Reference for this review. Submissions expressed concern that the Mount Victoria-Blue Tier area had not been adequately reserved, despite containing multiple National Estate values, and suggested that the process for assessing National Estate in the area was flawed. It was also suggested that the RFA process was flawed in the consideration of glacial refugia on the Blue Tier.

A submission suggested that the actions specified in Attachment 1.3 of the RFA for the protection of National Estate values were not appropriate protection measures. It also expressed concern that the RFA assessment of National Estate values failed to publish information on values that depended on reservation for protection, as distinct from those that could be managed through other means.



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The same submission also advocated that the Commission should revisit the RFA assessment of National Estate values, to determine reservation requirements; investigate the legality of Clause 27 of the RFA which, it was claimed, effectively suspended the operation of statutory obligations under the *Australian Heritage Commission Act 1975* (Cth), replacing them with policy instruments instead; and assess the impacts on National Estate values during the first five years of the RFA.

4.8.3 Analysis

Commitments and milestones in the RFA did not include revisiting pre-RFA decisions on reservation/non-reservation of areas with National Estate values, or decisions on prescribed actions for such values. Nor did they include requirements to investigate the legality of National Estate related Clauses in the RFA, or to carry out further assessment of the impacts on National Estate values since the signing of the RFA. As such, the Commission cannot carry out investigations in these specific areas as part of this review.

The Commission is satisfied that the Parties have delivered on RFA commitments for managing and protecting National Estate values in Tasmanian forests, with only a few commitments outstanding. The objective to reserve and protect National Estate values, through the Comprehensive, Adequate and Representative reserve system, the application of Tasmania's forest management system, and specific commitments under the RFA, has largely been met.

The Commission considers that outstanding commitments, while not critical in the context of achieving the overall objective, should be implemented as soon as possible and before the next review. As highlighted in the Background Report, commitments have only been partially met for funding and accrediting digital maps for all lands in Tasmania listed on the Register of the National Estate (as specified under Attachment 1.6 to the RFA). The main reason for this involved the Commonwealth's stated intention to revoke the *Australian Heritage Commission Act 1975* (Cth), and to amend the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) to provide for a National Heritage Places List.

As reported in the Background Report, no action has been taken to revise the archaeological manual to ensure historic values are considered in a manner consistent with best practice, as specified under Attachment 1, Table 1, Category 3 of the RFA. The State's review of the *Aboriginal Relics Act 1975* (Tas) and the likelihood of changes to that Act were cited as reasons for this (see section 7.4).

Recommendation 4.9

That the Parties deliver on the outstanding National Estate commitments contained in Clause 6 and Table 1, Category 3 of Attachment 1 to the RFA, prior to commencement of the next five year review.



4.9 Research

4.9.1 Background

Under Clause 88 of the RFA the Parties agree that continuing research is vital to ensure that all aspects of forest management remain up to date and decisions are based on good information. The Parties also agreed to make publicly available, wherever practical, research reports relevant to the substance of the RFA (Clause 89). Attachment 13 outlines priority research areas. These were to be used as a guide when examining research proposals and establishing research programs. Priority areas of research cover the following subjects:

- biodiversity conservation and management (7 themes);
- carbon budgets and flows (3 themes);
- environmental impact and ecological management of fire;
- site specific natural and cultural heritage conservation;
- non-wood values of forests (4 themes);
- pest management (2 themes);
- silvicultural techniques (7 themes);
- social and economic research (8 themes); and
- soil and water conservation (7 themes).

4.9.2 Issues

There were only a few issues raised in submissions on the Background Report on the subject of research. A submission called for more research into the impacts of plantations on water supply, continuing economic and social impacts of the RFA, flora and fauna research associated with forest practices, industry processing and product development, and sustainability of forest practices.

Another submission indicated that more research to improve the Forest Practices Code was required. This was supported by concern expressed by the Forest Practices Board that there was declining funding to support the scientific services available to underpin the continuous improvement of Forest Practices System.

Another issue was how Parties are tracking research reports and updating research priorities relevant to the substance of the RFA to ensure that research issues are current and research findings are made publicly available.

The Commission received a number of submissions in response to the Draft Recommendations Report about the need for the Parties to engage relevant stakeholders in the determination of priorities for research.



4.9.3 Analysis

Comments on specific research can be found in the relevant sections to this review. A requirement for increased research support for the Forest Practices Code is incorporated in Recommendation 4.1.

The Commission notes that a list of research and publications, which contributes to the substance and commitments of the RFA, would be useful in the review documentation for the next five year review.

The RFA provides no commitments to review the list of priority research areas. It could be expected that these would change during the life of the RFA and the Commission considers that the Parties should review the list as part of future five year reviews of the RFA and accordingly makes Recommendations 4.10 and 4.11.

Recommendation 4.10

That the Parties prepare a list of relevant research reports at future five yearly reviews.

Recommendation 4.11

That the list of priority research areas in Attachment 13 should be reviewed by the Parties, in consultation with relevant stakeholders, at future five yearly reviews to determine if priorities have changed.

4.10 Water

4.10.1 Background

In Attachment 10.1 of the RFA the State committed to implement the State Policy 'Setting new Standards for Water Quality.'

The *State Policy on Water Quality Management* has a number of implementation requirements that relate to the Forest Management System. The Background Report records the adoption of the *State Policy on Water Quality Management* in September 1997.

4.10.2 Issues

Issues raised by submitters on the Background Report, Draft Recommendations Report and in hearings covered a large number of matters ranging from the general to the specific, and are listed below:

- the impact of the forest industry on the State's water resources. These ranged from general concerns that forestry activities polluted water catchments, to specific concerns about specific practices in particular locations;



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- the failure to implement the Forest Practices Code on streamside reserves with a number of specific examples being tendered in evidence. These related to alleged logging and burning in streamside reserves, inappropriate crossings of streamside reserves, failure to map relevant water-courses on Forest Practices Plans, and logging in and entering a swamp contrary to a Forest Practices Plan. One example related to the deliberate expansion of a streamside reserve immediately upstream of an established water quality monitoring station to ensure impacts of logging were not measured;
- the failure of the Forest Practices Code to protect the head-waters of catchments;
- the leaching of 1080 and triazine herbicides into water-courses and the subsequent exposure of humans and domestic stock;
- the effect of clearfelling and widespread plantation establishment on catchment hydrology and in particular on water yield and quality;
- the importance of ground water recharge areas together with the concern that the issue had not been addressed in a particular Forest Practices Plan;
- the failure of the forest industry's planning system to take account of the *State Policy on Water Quality Management 1997 (Tas)*; and
- effectiveness of implementation and monitoring of the *State Policy on Water Quality Management 1997 (Tas)* in terms of the management and harvesting of forest vegetation.

The Commission received submissions on the Draft Recommendations Report about water quality and quantity and the impact of forestry activities and plantations on catchment yield. One submitter at the hearings criticised the approach taken to investigate forest related issues associated with water quality and quantity in catchment areas. Another submitter contrasted the lack of appropriate codes of practice and guidelines dealing with agricultural use to those that apply to forest operations.

4.10.3 Analysis

The Terms of Reference for this Review require the Commission to assess whether the State has fulfilled its intentions to improve the forest management system across forest management agencies and land tenures, by implementing the State Policy 'Setting New Standards for Water Quality.'

The Commission notes the progress made in implementing the *State Policy on Water Quality Management 1997 (Tas)* through the progressive setting of Protected Environmental Values and Water Quality Objectives. The Commission, through the Reference Panel, sought additional information from the Department of Primary Industries, Water and Environment on the progress with implementation of the *State Policy on Water Quality Management 1997 (Tas)*. The Protected Environmental Values have been prepared for fresh waters and work will commence in 2003 on the setting of Protected Environmental Values for groundwaters and coastal waters. A process for establishing Water Quality Objectives has been developed and is now ready for application.

The Commission also notes that the Forest Practices Code has been amended to reflect the provisions of the *State Policy on Water Quality Management 1997 (Tas)* and that the Draft Reserve Management Code of Practice also takes account of the Policy. It is noted that the report prepared by Davies (1999)



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on the implementation of the *State Policy on Water Quality Management 1997* (Tas) in the Forest Practices Code identified some questions as to whether the new soil and water management provisions in the Forest Practices Code would be fully effective in delivering the Policy objectives. The Commission notes advice from the Department of Primary Industries, Water and Environment that an agreed program of on going research being undertaken by the Forest Practices Board should address these concerns.

Most of the issues raised in submissions to the Review on water generally relate to the implementation of the Forest Practice Code, the implementation of which is discussed at some length in section 4.2.

The Commission notes that there have been other significant developments in water management including the amendments to the *Forest Practices Act 1985* (Tas), the new *Water Management Act 1999* (Tas) and the new *Natural Resource Management Act 2002* (Tas).

The amendments to the *Forest Practices Act 1985* (Tas) have extended the ambit of the Act to all forest clearing operations on all land tenures, and not just those involved in commercial forestry operations. The effect has been to extend the provisions of the Forest Practices Code, specifically those provisions relating to the streamside reserves, erosion control, soil management, and pollution control to all forest clearing operations. It also provides the mechanism for controlling clearing of forest on agricultural land in order to implement policy on maintaining a Permanent Forest Estate.

The *Water Management Act 1999* (Tas) provides for the preparation of statutory water management plans, the development of which are currently progressing on a priority basis agreed with the Commonwealth. These provide for an environmental flow, and are also a vehicle for integrating the priorities for use of water on a catchment scale.

The Natural Resource Management Framework, and legislation, will integrate all the above through the provision of integrated regional natural resource management strategies. These will help in coordinating the pattern of land use in a region so as to protect water values.

The Commission finds that the commitment contained in Attachment 10.1 has been fulfilled, but notes that further actions under the *State Policy on Water Quality Management 1997* (Tas) continue. The Commission notes the revision to the *Forest Practices Act 1985* (Tas), with measures to address the protection of forest riparian vegetation on private lands, and to adequately address the issues associated with vegetation retention and water quality, as envisaged in the RFA.

Comments in two submissions address a broader issue relating to the capacity of the State's forest industry planning system to take account of catchment hydrology issues at a landscape scale. The issue relates only obliquely to the *State Policy on Water Quality Management 1997* (Tas). It relates more particularly to water yield from catchments. Concern was expressed, and evidence cited to the effect that in general, fast growing young forests tend to use more water, and are lowering the water yield in streams. This issue could generally be considered at the strategic level in Forest Management Plans or at the tactical level in the Three Year Plans required under the *Forest Practices Act 1985* (Tas). The Forest Practices Code addresses the short term issue of increased run off as a result of clearfelling by placing a limit of no more than five per cent of the catchment of a town water supply to be clearfelled in any one year. This does not fully address the long term issue of the reduction of water yield from



catchments with a large proportion of quickly growing forests. The Commission notes the report by Bren and O'Shaughnessy (2001) on the effects of forestry activity on water availability.

The Commission considers that the natural resource management regional strategies proposed under the Tasmanian Natural Resource Management Framework should specifically address the interrelationship between forest management, water yields and the water management planning process (see Recommendation 4.17).

4.11 Environmental Management Systems

4.11.1 Background

Tasmania committed, in Clause 93 of the RFA, to further develop its Forest Management System consistent with the principles outlined in Attachment 5 to the RFA. Specifically to introduce environmental management systems, acknowledging that its objective for State Forests was a system comparable with the ISO 14000 series.

4.11.2 Issues

Several submitters commented on the certification of Forestry Tasmania's environmental management systems as compliant with the ISO 14001 standard. Issues raised by submitters included:

- that the ISO 14001 standard permitted the continuation of practices, unacceptable to the submitter, including clearfelling, logging of old growth forest and the use of triazine herbicides and 1080;
- the lack of opportunity for local communities to be involved in the accreditation process;
- Tasmania's wood product market will be under threat in those countries that adopt the requirement for Forest Stewardship Council certification; and
- the adoption of the Forest Stewardship Council certification is a preferable alternative.

The Commission received a number of submissions in response to the Draft Recommendations Report suggesting that environmental management systems for reserves should be to a standard comparable with internationally recognised standards such as ISO 14001.

4.11.3 Analysis

Forestry Tasmania advised the Commission in hearings that it has developed an Environmental Management System that was certified in November 2001 as complying with ISO 14001. Community involvement in the ISO 14001 certification process is not mandatory. Community involvement in the forest practices system is dealt with in section 4.2 of this report. The ISO 14001 standard meets the requirements of Attachment 5 of the RFA. The Environmental Management System covers management activities in both production State forests and forest reserves. The Commission notes Forestry Tasmania's evidence provided at hearings that it has ceased the use of Triazine herbicides as from 1996.



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It is clear that the State has met the requirements of Clause 93 in achieving the certification of the forest management system for State Forest as meeting the ISO 14001 standard. There is no requirement in the RFA for the State to commit to either the Forest Stewardship Council, the Australian Forestry Standard or any other particular certification system. Certification is further discussed in section 5.10.

The Background Report informs that some private forestry companies have developed environmental management systems to the ISO 14001 standard for all, or part of, their operations. There are no such systems currently in use, or under development, for conservation reserves managed by the Department of Tourism, Parks, Heritage and the Arts (formerly part of the Department of Primary Industries, Water and Environment).

While the priority was properly to get ISO 14001 certification in the production forest areas, as this is where there is the greatest potential for environmental harm, it is still important that an environmental management system be developed for the conservation reserve estate as well. To this extent it is noted that the Background Report states that there is *...no current initiative to develop an Environmental Management System for management of other conservation reserves*.

The Department of Primary Industries, Water and the Environment has responsibility for management of that part of the Comprehensive, Adequate and Representative reserve system established under the *Crown Lands Act 1975* (Tas). The Department of Tourism, Parks, Heritage and the Arts has responsibility for management of that part of the Comprehensive, Adequate and Representative reserve system established under the *National Parks and Wildlife Act 1970* (Tas). This encompasses a range of land uses largely centred around conservation, recreation and tourism. There are also extractive uses permitted in selected reserves ranging from honey production to mining operations. An accredited environmental management system would give confidence that appropriate processes were in place to ensure effective environmental management in the Comprehensive, Adequate and Representative reserve system.

Recommendation 4.12

That the State develops an environmental management system for reserves and other public lands consistent with Attachment 5 of the RFA prior to the next five yearly review.

Recommendation 4.13

That the Parties encourage the development of environmental management systems in the private forest sector.

4.12 Maintaining a permanent forest estate

4.12.1 Background

In recognition of the State's undertakings on intensive forest management under the RFA, in particular expanded plantation development, and the limited availability of land for plantation establishment, the State agreed to adopt the policy framework outlined in Attachment 9 of the RFA. This policy framework refers to a number of commitments, including:

- maintaining an extensive and permanent native forest estate with the objective of increasing the sustainability of the total forest estate;
- maintaining a nominated minimum level of total native forest area, to meet the requirements of the National Forest Policy Statement for the protection of regional conservation values and catchment objectives;
- maintaining the area of native forest at a nominated minimum level within each Interim Biogeographic Regionalisation of Australia region, conducting a formal review of the area of forest communities within each Interim Biogeographic Regionalisation of Australia region, and reporting on findings in the five yearly review;
- reforestation and regeneration prescriptive requirements where harvesting of native forest occurs on private land, and reference to plantation establishment (including conversion of native forest);
- introducing by the year 1999 mechanisms to encourage native vegetation retention and management including the protection of riparian vegetation, consistent with the agreed outcomes of the Native Vegetation Initiative under the Tasmanian Natural Heritage Trust Partnership Agreement;
- ensuring that no further forest communities become endangered; and
- reviewing the policy as part of the ongoing review of the Forest Practices Code and in accordance with the provisions for public comment set out in the *Forest Practices Act 1985* (Tas).

4.12.2 Issues

A large number of submissions on the Background Report, the Draft Recommendations Report and at the hearings commented on RFA commitments relating to the maintenance of a Permanent Forest Estate. A common concern centred on the rate at which native forest was being cleared and replaced by plantations. Submissions commented that this trend had a detrimental effect on smaller, special species timber industries and, adversely affected the social and economic fabric of the rural communities. It was also submitted that this trend was at odds with the RFA objectives concerning the maintenance of biological diversity, and the protection of threatened species and habitats.

A number of submissions stated that there had been a lack of progress towards introducing mechanisms to encourage native vegetation retention and management, and the protection of riparian vegetation, consistent with the agreed outcomes of the National Vegetation Initiative under the Tasmanian Natural Heritage Trust Partnership Agreement (Attachment 9.8). A submission noted that, under Attachment 9.8, the State was bound to work towards no net loss of native vegetation, and



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yet this intention is at odds with the Intensive Management Program under the RFA, that the submitter stated seeks to establish 100,000 hectares of new plantations primarily through clearing native vegetation.

Another issue that was widely canvassed involved the State policy for maintaining a Permanent Forest Estate. It was claimed that this policy was at odds with the intent of the RFA, in that it allowed for the removal of up to half of the vulnerable and endangered forest communities on private land. It was also claimed that there was no clear guidance on how things should proceed once thresholds were reached. It was suggested that the scientific advice prepared by the Scientific Advisory Group for the Comprehensive, Adequate and Representative Private Forest Reserve Program (February 2001) should be accepted and implemented as a matter of urgency as a way of resolving some of these issues. Submitters also drew attention to the long time being taken for review of the policy and the fact that the Comprehensive, Adequate and Representative Scientific Advisory Group has provided advice toward a new policy that has not yet been adopted.

A submission suggested that amendments to the *Forest Practices Act 1985* (Tas), aimed at managing land and tree-clearing as part of agricultural development, were ineffective. Another issue raised was the effectiveness of the Act in controlling firewood collection. It was also claimed that no additional resources were committed to monitor compliance or otherwise deal with the extended workload that would result from the legislative change.

The Commission received a submission on the Draft Recommendations Report critical of Proposed Recommendation 4.10 (now Recommendation 4.14) and asserting that the Commission should form a view as to the appropriate levels for retention of native forest. Other submissions criticised the Proposed Recommendation 4.10 (now Recommendation 4.14) in the Draft Recommendations Report as being too prescriptive and pre-empting the outcome of the review of the policy on maintaining a Permanent Forest Estate. Another issue raised was the inadequacy of the proposed timetable to allow effective stakeholder consultation.

A further submission noted the small change in forest estate since the RFA and suggested the consideration of native and non-native forest by the policy on maintaining a Permanent Forest Estate, and questioned the need to change the policy on maintaining a Permanent Forest Estate. This submission also suggested a need for differential targets on private and public land, should a change to the policy occur.

4.12.3 Analysis

The primary issue raised in submissions centres on the State's policy on the maintenance of a Permanent Forest Estate and the extent to which it has been implemented. Although the policy is referred to in the RFA in a generic sense, the crucial elements of the policy – prescribing the retention of native forest above minimum thresholds – are not explicit in the RFA. Under the current policy, minimum thresholds are expressed as a percentage of the native forest estate assessed and mapped in 1996 for the RFA. Since 1997, the following thresholds have been used:



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- Statewide level: 80 per cent of the native forest estate to be maintained; and
- bioregional level: Interim Biogeographic Regionalisation for Australia (IBRA 4).

Current proportion of native forest in reserves	Proportion of native forest to be maintained
0-30%	>80%
30-60%	>60%
>60%	Current reserve area

- forest communities: at least 50 per cent of the current area in each bioregion to be maintained.

During 1999-2000 the Forest Practices Board established administrative mechanisms to monitor and report on compliance with the policy. Data on changes to the native forest estate, by forest community within the Tasmanian bioregions, is available in the *Annual Report of the Forest Practices Board 2000-2001*. During the four years from 1 July 1997 to 30 June 2001, the overall reduction in the native forest estate amounted to approximately 62,831 hectares, mainly as a result of conversion for plantation or agriculture. The Commission accepts that this data is based on gross areas approved for future harvesting or clearing for agriculture, and is therefore an overestimation of the extent of change. On the other hand, data contained in the Sustainability Indicators Report show that the mapped extent of native forest communities decreased by 38,100 hectares, since 1996. Again, the Commission accepts that this data maps actual change in net area but does not fully reflect agricultural clearing and small-scale forestry activity on private property, and is therefore an underestimation of the extent of change. On the basis that the extent of change is somewhere in between the two estimates, the current native forest area is well in excess of the 80 per cent Statewide threshold, at approximately 98-99 per cent of the 1996 baseline area. The changes to the *Forest Practices Act 1985* (Tas) requiring approvals for, and reporting of, all native forest clearing should result in a significant improvement in the accuracy of this statistic.

During the last five years, maintenance of native forest across Tasmania has occurred in accord with the bioregional thresholds, based on the proportion of native forests in reserves, as specified in the policy on maintaining a Permanent Forest Estate.

The data also indicate that all forest communities are well within the 50 per cent threshold. While the level of conversion of some communities is approaching the threshold, the Commission acknowledges that action being undertaken by the Forest Practices Board should ensure that these communities are maintained in accord with the policy on maintaining a Permanent Forest Estate.

In 2001, the State initiated a review of the policy on maintaining a Permanent Forest Estate (as required by Attachment 9.11), to which the Scientific Advisory Group for the Comprehensive, Adequate and Representative Private Forest Reserve Program submitted a technical report to the Chief Forest Practices Officer. The Commission considers that the outcome of this review will play a crucial part in determining whether or not the State ultimately fulfils its commitments under Attachment 9.9, of the RFA. The Commission notes that under Attachment 9.11 of the RFA, the State agreed to review the policy on maintaining a Permanent Forest Estate as part of the on going review of the Forest Practices Code and in accordance with the provisions for public comment and review set out in the *Forest Practices Act (Tas) 1985*. The Commission notes that the policy on



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maintaining a Permanent Forest Estate is directly aimed at the native forest estate. The Commission is concerned about the lack of progress on the review of the policy on maintaining a Permanent Forest Estate, and accordingly has recommended that the review be finalised as a matter of urgency.

Under Attachment 9.9, the State commits to ensuring that no further forest communities become endangered as a result of implementing its policy on maintaining a Permanent Forest Estate. Although no additional forest communities have become endangered, there has been a reduction in the areal extent of some endangered forest communities during the last five years – for example, at 30 June 2001 according to the *Annual Report of the Forest Practices Board 2000-2001*, the extent of wet *Eucalyptus viminalis* forest on basalt has been reduced by approximately 358 hectares, and shrubby *Eucalyptus ovata* forest by approximately 167 hectares. A number of vulnerable communities have also been depleted, to a greater extent, during this time. In its current form, the policy on maintaining a Permanent Forest Estate does not differentiate between the forest communities classified as non-threatened and those classified as rare, endangered or vulnerable under the RFA. The Commission notes the recent administrative action by the Forest Practices Board to impose a moratorium on further clearing of rare and endangered forest communities pending the outcome of the current review of the policy on maintaining a Permanent Forest Estate.

The Commission considers the policy on maintaining a Permanent Forest Estate to be the most appropriate instrument for ensuring progress for the State's commitments under Attachment 9.9. The current review of the policy provides the opportunity to address this issue. The Comprehensive, Adequate and Representative Scientific Advisory Group Report provides a number of recommendations on thresholds and differentiation between rare, endangered and vulnerable forest communities, that the Commission considers should be taken into account in reviewing the policy, together with other information and advice from other stakeholders, and the views of the Commonwealth.

The other major issue raised concerns the introduction of mechanisms to encourage native vegetation retention and management on private land.

Under Attachment 9.8 of the RFA, the State made a commitment to introduce such mechanisms, by the year 1999, consistent with the agreed outcomes of the National Vegetation Initiative, as set out in the Tasmanian Natural Heritage Trust Partnership Agreement. The Commission notes that these outcomes include working towards the national goal to reverse the long-term decline in the quality and extent of Australia's native vegetation cover.

The linkage between the RFA and Natural Heritage Trust commitments is articulated in the policy framework announced by the Tasmanian Minister for Primary Industries, Water and Environment on 3 July 2001 and reported in the Background Report. As part of this package, the *Forest Practices Act 1985* (Tas) has been amended to require all tree clearing to be the subject of the Act and require the Forest Practices Board to monitor maintenance of a Permanent Forest Estate. These amendments also address commercial firewood collection. This provides a new mechanism for controlling the clearing of native forest vegetation on private land, including the protection of riparian vegetation.

The Minister's statement also foreshadowed a review of the policy on maintaining a Permanent Forest Estate.



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In addition, the Minister announced measures, including completion and maintenance of the vegetation database, identification of non-forest vegetation priorities, and facilitation of conservation on private lands through incentives, conservation plans and education and awareness.

Other relevant mechanisms introduced by the State include facilitating conservation on private land through: covenanting programs; an incentive program for riparian vegetation management; and a consultation program to develop ways of managing native non-forest vegetation, focussing on property-based plans. At this relatively early stage, it is difficult to gauge the effectiveness of these reforms. However, by the time of the next five yearly review there should be enough information to allow an analysis.

The Commission notes that these mechanisms, more often than not, have been put in place after the agreed timeframe.

The Commonwealth, through the Affected Agency Group, advised the Commission that all jurisdictions, including Tasmania, subsequent to the RFA, developed and agreed the National Framework for the Management and Monitoring of Australia's Native Vegetation (Natural Resource Management Ministerial Council 2001). This is the vehicle to implement the goal agreed by all governments (including Tasmania) in the Natural Heritage Trust Partnership Agreement to reverse the long term decline in quality and the extent of Australia's native vegetation. The Commonwealth's position is that the commitment in the RFA on native vegetation retention should be consistent with the National Framework. The outcomes required by the National Framework included no clearing of: endangered and vulnerable communities; critical habitat for threatened species; other threatened communities (listed under State and Commonwealth legislation, or identified through the Natural Resource Management Ministerial Council or other government processes).

The State's view, through the Affected Agency Group, is that the National Framework does not constitute a commitment or part of a commitment under the RFA. Further the Framework is expressed in terms of desired outcomes rather than specific milestones or commitment. As such, it is an aspirational document that provides a guide to the State's native vegetation management policy.

The Commission notes that, as a signatory to the Natural Heritage Trust Partnership Agreement, Tasmania has agreed to contribute toward the stated national outcome of putting '...effective measures in place to retain native vegetation including controls on clearing.' The Natural Heritage Trust Partnership Agreement is directed toward meeting the national goal of reversing the decline in the quality and extent of Australia's native vegetation cover.

The Commission notes that the Parties have entered into two relevant Agreements, the National Framework for the Management and Monitoring of Australia's Native Vegetation (Natural Resource Management Ministerial Council 2001), and the National Action Plan for Salinity and Water Quality Bilateral Agreement (2002). These commit the State to striving for an outcome of no further clearing of endangered and vulnerable plant communities, and to consulting with the Commonwealth before finalising the amendments to the policy for maintaining a Permanent Forest Estate. The Commission notes that the National Framework explicitly states that it does not seek to set vegetation retention or revegetation targets for individual jurisdictions and that individual jurisdictions will be responsible for determining targets in the context of their own work plans. The Commission also notes that the words



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in the RFA refer to encouragement of native vegetation retention on private land consistent with the agreed outcomes and not to regulation that implements the outcomes.

The following Recommendations 4.14 and 4.15 suggest the adoption of an approach aimed at providing the State with a policy framework that would allow it to make progress against its commitments at Attachment 9.9 and 9.11 of the RFA. In making the Recommendations, the Commission has taken into account the core RFA industry and conservation related objectives. Adopting these Recommendations would also have positive implications for progressing the RFA private land and Forest Management System commitments.

It is not within the Terms of Reference of this review for the Commission to recommend specific settings for the retention of native forest. The Commission notes that the specific target settings for the retention of native forest are being developed by the State during the current review of the policy on maintaining a Permanent Forest Estate.

Recommendation 4.14

That the State completes the review of the policy on maintaining a Permanent Forest Estate taking into account public comment. That, subsequent to the review and before the end of May 2003, the State amends the policy to increase the levels of retention of native forest, and specifically to ensure that no further forest communities become threatened and that there is no deterioration in the status of any existing threatened forest community.

Recommendation 4.15

That, subsequent to the review of the policy on maintaining a Permanent Forest Estate, the State implements the policy through a legislative framework.

The issue raised in submissions regarding the rate at which native forest was being cleared and replaced by plantations is one that cuts across a number of other RFA commitments, including Ecologically Sustainable Forest Management, employment and industry development. The policy and regulatory framework within which plantation establishment occurs in Tasmania is discussed more fully in section 5.9 of this report.

4.13 Sodium monofluoroacetate (1080)

4.13.1 Background

The RFA does not specifically address the use of sodium monofluoroacetate (1080) in forest management except for identifying the need for further research and development of alternative chemical free pest and weed control systems (Attachment 12.15).



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The Forest Practices Code provides for the use of 1080 for the purpose of controlling browsing animals inflicting damage on newly established seedlings in forest regeneration or plantation sites.

The primary target species are two wallaby species – Bennetts and Rufous – and the brush-tailed possum. A permit is required authorising the use of 1080 poison baits, which also must be laid pursuant to the 1080 Code of Practice.

4.13.2 Issues

The use of 1080 poison for control of native wildlife to protect forest regeneration or plantation establishment was seen by a number of submitters as an unacceptable and unsustainable consequence of the practice of clearfelling and plantation establishment. The issues attached to use of 1080 related to:

- killing of native wildlife;
- killing of threatened species;
- risk to domestic animals;
- contamination of the water supply of regional communities;
- scale of use of 1080; and
- 1080 poisoning is asserted to be contrary to the provisions of the *Animal Welfare Act 1993* (Tas).

The Commission received a submission in response to the Draft Recommendations Report suggesting that there may be economic implications for forest operations arising from the current review by the National Registration Authority of registration of products containing 1080.

4.13.3 Analysis

The killing of native wildlife is perceived either as a nature conservation, an animal welfare, or an animal rights issue by submitters who oppose the use of 1080.

Nature conservation and animal welfare issues and those related to the protection of domestic animals, contamination of water supplies and safety of humans are addressed by the following legislation and policies:

- *Poisons Regulations 1975* (Tas);
- *National Parks and Wildlife Act 1970* (Tas);
- *Threatened Species Protection Act 1995* (Tas);
- *Animal Welfare Act 1993* (Tas);
- Code of Practice for the Use of 1080 for Browsing Animal Control; and
- Forest Practices Code and supporting guidelines.

Government policy does not explicitly acknowledge the animal rights perspective as a valid determining factor for decision on use of 1080 for browsing animal control.



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Attachment 10.7 has a related commitment to prepare a statewide policy on forest pest and disease management, see section 4.17 of this report. Another related action is contained in Attachment 12.15 for research and development of alternative chemical free pest and weed control systems for intensively management forests.

The RFA accredits Tasmania's Ecologically Sustainable Forest Management system together with the improvements specified in Clauses 62-64, 93, 94 and Attachments 10 and 11. These do not seek to implement any changes to the 1080 management system. Therefore, to the extent that the submissions received call for a change to the current policies and management systems they are beyond the scope of this review.

Representations were made to the Commission on the Background Report and at the hearings that there were failures to implement relevant aspects of the Forest Practices Code associated with the management system of 1080. These can be addressed through improvements to the Forest Practices System (Section 4.2). The Commission notes that the Forest Practices Code requires that 1080 use comply with the Code of Practice for the Use of 1080 for Browsing Animal Control.

A submission on the Background Report raised two issues about 1080 which conflicts with the premise on which 1080 policy, including the Code of Practice for the Use of 1080 for Browsing Animal Control, is based. First, it was asserted that 'some RSPCA officials ...have described the use of 1080 as being in conflict with the state's anti-cruelty legislation.' Secondly, reference is made to studies that show that sublethal doses of 1080 cause residual damage to the reproductive systems, brains and kidneys of relatively resistant and often endangered species such as spotted-tailed quolls, white goshawks and wedge-tail eagles. These issues are outside the scope of this review as the 1080 system is part of the Forest Management System accredited under the RFA.

Nevertheless, the Commission was concerned that evidence asserted seemed to show that a key policy and program was in conflict with the statutes. The Commission has however established that the *Animal Welfare Act 1993* (Tas) provides, through the *Animal Welfare Regulations 1993* (Tas), for the use of specific poisons for specific target animals to be exempt from the provisions of the Act. 1080 is listed as a poison that can be used to control those species typically targeted in forest operations.

The Commission notes the assertions in relation to the impact of sublethal doses of 1080 on a suite of rare and endangered species and refers these to the Department of Primary Industries, Water and Environment.

The Commission notes that the State is continuing to work with stakeholders to find alternative methods to control damage from browsing animals. The Commission also notes that the National Registration Authority is currently undertaking a review of the registration of products containing 1080 and the approval of associated product labels. The National Registration Authority is not due to finalise its review until mid 2004. The Commission notes that the review by the National Registration Authority has, among other things, the potential to affect the economics of future forest operations.



4.14 Fire management

4.14.1 Background

Clearfelling and burning is the principal method for regenerating native eucalypt forests in the wetter parts of Tasmania, and is also used in the harvesting and re-establishment of plantations. Burning is typically undertaken in autumn on still, clear days. Large palls of smoke are generated, and these can descend to the ground in a concentrated form some distance from the regeneration burn. There are no specific commitments in the RFA in relation to smoke management.

It should also be noted that broad scale fires are used in the agricultural community as a land and crop management tool. They are also used in the State's reserve system as a habitat management tool and on all land tenures as a hazard reduction tool.

The National Environment Protection Measure on Air Quality of 26 June 1998 establishes national ambient air quality standards for six major pollutants. These are measured at monitoring stations in the major capital cities. The air quality standards prescribe a maximum concentration level, averaged over a defined period, and a maximum number of days per year, that that level can be exceeded.

4.14.2 Issues

Smoke from regeneration burns and preparation of plantation sites was raised as a concern by a number of submitters. It was raised as an issue that impacts on human health and the quality of life of some rural communities. It was also said to be a significant deterrent to tourism.

Some submissions on the Background Report, Draft Recommendations Report and in hearings raised the issue of the danger posed to the Tasmanian community of regeneration burns escaping and destroying property, economic, environmental and social values.

4.14.3 Analysis

Smoke from regeneration burns can be distinguished from most wildfires in that it is generally a result of large fires on days of little or no wind. There is therefore scope for heavy concentrations of smoke to impact on local areas. It is further distinguished from wildfires in that there is opportunity to plan the timing and location of burns to minimise such effects.

The issue of the effects of smoke from regeneration burns is an environmental management issue, and could be considered to fall within the scope of either the Forest Practices Code, or the State's environmental management and pollution control system. The current version of the Forest Practices Code does not address this issue in any great detail.

The State Fire Management Council has recently developed a set of best practice guidelines for smoke management. These have been adopted by Forestry Tasmania for forestry operations in State Forest. The guidelines require fire management planners to take account of available weather forecasts to assist in predicting where the pall of smoke will come to ground, and to light the fires at a time when the impact on populated areas can be minimised.



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The Commission acknowledges that forest managers face difficulties in balancing all competing factors. The limited degree of freedom available, as a result of the small climatic window of opportunity to safely undertake the burns, further complicates an already difficult and complex management task.

The Commission acknowledges that fire is an essential part of forest management for silvicultural, habitat management and forest and property protection. There are inherent risks attached to use of fire in forest systems including the risk of fire escapes. The Commission notes that there are established protocols and guidelines referenced in the Forest Practices Code and that these have been the subject of separate independent reviews. The RFA has no specific commitments on the use of fire in forest ecosystems. The Commission notes recommendations under the assessment of the *Draft Environmental Protection Policy (Air Quality) September 2001* (Tas) that prescriptions for the management of smoke from planned burns be developed to augment State Fire Management Council guidelines and be incorporated into the Forest Practices Code within 12 months of the introduction of the *Environmental Protection Policy (Air Quality)* (Tas).

Recommendation 4.16

That the Forest Practices Board considers, during the next review of the Forest Practices Code, the issue of smoke management from forestry operations, including giving effect to the smoke management guidelines.

4.15 Developing a State Policy on integrated catchment management

4.15.1 Background

In Attachment 10.2 to the RFA Tasmania stated its intention to develop a State Policy on integrated catchment management. Further development of State Policies has been delayed pending review of the *State Policies and Projects Act 1993* (Tas).

The Background Report, in discussing Attachment 10.2, provides details of measures taken in Tasmania to develop a Strategic Framework for Natural Resource Management incorporating integrated catchment management.

The Commission notes that the *Natural Resource Management Act 2002* (Tas) received Royal Assent on 14 November 2002, and will commence on proclamation. The Commission understands that the Act will not be proclaimed until the Tasmanian Natural Resource Management Council and the three regional committees for natural resource management are established. An expression of interest for membership of the Tasmanian Natural Resource Management Council was published in the three daily newspapers on 26 October 2002, and it is anticipated that the Council will be finalised and established in early February 2002. Further, the Commission has been advised by the Department of Primary Industries, Water and Environment that the three regions are progressing with the



establishment of their respective regional committees for natural resource management, and they are expected to be in place by early 2003.

4.15.2 Issues

A number of submissions on the Background Report and in hearings raised issues about integrated catchment management. Some commented on the failure of the Forest Practices System to protect catchment values including clean water, landscapes, biodiversity and soil. In so far as these relate to alleged failures of the Forest Practices System they are addressed at section 4.2 of this report.

4.15.3 Analysis

The commitment to establish a State Policy on Integrated Catchment Management has been overtaken by the developments in both the national and Tasmanian arenas, reported in the Background Report. The national framework for *Managing Natural Resources in Rural Australia for a Sustainable Future* (1999) subsumes integrated catchment management in a wider policy instrument. Similarly the Tasmanian Natural Resource Management Framework (2002) developed for Tasmania was modelled on the national framework and encompasses the concept of integrated catchment management.

The objective inherent in the commitment to establish a State Policy was to give the policy some degree of legislative force. The *Natural Resource Management Act 2002* (Tas) provides the legislative force envisaged in the RFA.

The legislation will require the production of regional natural resource management strategies to integrate the management of natural resources for the regions.

The Commission finds that the State has yet to fulfil its commitment to a statewide approach to integrated catchment management. The commitment will be fulfilled when regional committees on natural resource management have prepared the regional natural resource management strategies and the Minister accredits these strategies.

Recommendation 4.17

That the State moves quickly to enable proclamation of the Natural Resource Management Act 2002 (Tas) and facilitate regional natural resource management strategies.



4.16 Implementing the Historic Cultural Heritage Act 1995

4.16.1 Background

In Attachment 10.4 of the RFA the State undertook to implement the *Historic Cultural Heritage Act 1995* (Tas).

At the time of negotiation of the RFA the Act had been passed but was yet to be proclaimed. The Act was proclaimed in 1997 and is being implemented.

4.16.2 Issues

Some submissions on the Background Report and in the hearings included a few general references to the impacts of forestry operations on cultural heritage values, including a specific reference to historic mining heritage values. These submissions did not relate directly to this particular commitment.

4.16.3 Analysis

In excess of 5,000 properties are now listed on the Tasmanian Register and a suite of administrative and educational systems are in place to facilitate the conservation of Tasmania's historic cultural heritage. The Commission finds that the *Historic Cultural Heritage Act 1995* (Tas) is being implemented and this commitment has been met.

4.17 Statewide Policies

4.17.1 Background

In Attachment 10.7 of the RFA the State agreed to develop and implement, in the first five years, a set of statewide policies on fire management, nature based tourism and recreation management, cultural heritage management in forest lands, and forest pests and disease management. This commitment arises from recommendation 1.7 in the 'Assessment of Ecologically Sustainable Forest Management Systems and Processes: Independent Expert Advisory Group – Final Report,' Background Report Part G (1997), Tasmanian Public Land Use Commission (1997a).

4.17.2 Issues

One submission on the Background Report expressed concern with the lack of progress with statewide policies on fire management, nature based tourism, cultural heritage and forest pest and disease control.

In response to the Draft Recommendations Report one submission raised issues to do with lack of progress on a statewide policy on cultural heritage management on forest lands. The submitter was concerned that the State needs to further investigate cultural heritage in forests and progress the



findings of the Independent Expert Advisory Group's Final Report (Public Land Use Commission, 1997a) detailing action on cultural heritage.

4.17.3 Analysis

The Commission notes the progress toward completion of this milestone reported in the Background Report, particularly for nature based tourism and forest pests and diseases. The Commission notes that this milestone was due in November 2002 and that it will be reviewed at the second five year review. Nonetheless, the Commission expects further progress to meet this commitment particularly on the provisions on cultural heritage management in forests, and the ecological aspects of statewide fire management policy (see also section 4.14), pest and disease management (see also section 4.13) and tourism and recreation management (see section 7.2).

4.18 Utilisation standards and waste

4.18.1 Background

The RFA does not have any specific commitments on wood utilisation standards and/or waste. The RFA does have several general references on the objective of increasing value adding and maximising employment in the forest based industries.

4.18.2 Issues

A large proportion of submissions received on the Background Report, the Draft Recommendations Report and in the hearings, including a number of very detailed analyses, were critical of the waste of wood products as a consequence of the utilisation standards, forest harvesting practices and market drivers.

Issues at a general level included:

- woodchipping as a low value use of a potentially high value product;
- allegedly deliberate 'downgrading' of sawlogs to pulpwood by cutting off end discs containing sawlog classification marks and the splitting of sound logs on the landings;
- high value specialty timbers being chipped, or being left on the forest floor to be burnt in regeneration burns or in preparation for plantation establishment; and
- the proposal to utilise wood for power production was seen as wasteful.

A very specific issue was also raised:

- the resource remaining on a particular forest coupe apparently already windrowed for burning prior to plantation establishment. The coupe was assessed into eucalypt and specialty timbers and forgone royalties estimated at \$685,000.



4.18.3 Analysis

Evidence was provided by Forestry Tasmania at the hearings that wood products arising from an integrated forest operation are generally classified into various grades of sawlog, pulpwood and or other products such as craftwood and firewood. What constitutes a saleable wood product is largely driven by market demand. Wood will generally only be recovered if there is a buyer prepared to pay at least the cost of recovery. If it is not sold then the wood will either be consumed in regeneration fires or left to rot. The proposed power plant at the Southwood development will provide an alternative customer for some of this 'waste' wood in the Southern Forests.

There are clear specifications for the classification of timber into various sawlog categories contained in the *Forestry Regulations 1999* (Tas) that apply to State Forest. Utilisation standards are largely market driven on private land, like any other primary product or crop. Resource owners, fellers and log haulage contractors are paid a premium price for higher grade products providing a market incentive to maximise utilisation of high quality product. Penalties apply to harvesting contractors failing to abide by the *Forestry Regulations 1999* (Tas) on State Forest, and these can also be applied at any point in the chain from the forest coupe to the processor.

The major stakeholders in the forest industry have developed the Tasmanian Log Supply Charter that provides an industry benchmark for utilisation standards in Tasmanian forests.

Information was sought from Forestry Tasmania at the hearings on utilisation standards and the general issue of waste. Forestry Tasmania provided information on the 1999 Ryan Inquiry, and the development of the Tasmanian Log Supply Charter, in partnership with industry stakeholders. They also advised the Commission on their systems for classifying wood for the market, and for monitoring the harvest of wood off coupes. Forestry Tasmania advised the Commission of their business unit 'Island Specialty Timbers' which salvages specialty timbers from coupes and markets the timber.

Forestry Tasmania advised that new markets were being developed for solid wood products using smaller diameter regrowth logs that do not reach sawlog specifications. These logs would normally enter the pulpwood stream but instead are used for peeler veneer products attaining a much higher value. It was explained that some of the whole log exports being undertaken by Forestry Tasmania are being used to test the market for this kind of product with a view to establishing new value adding processing capacity in Tasmania.

Evidence was provided by Forestry Tasmania at the hearings to the effect that harvesting of the coupe subject to the detailed analysis had not yet been completed. The Commission was advised that the paper had been reviewed, and that Forestry Tasmania considered that it lacked methodological rigour and had not used a standardised log classification system. Forestry Tasmania conceded that there is often a substantial quantity of unmerchantable timber left on the forest floor after a clearfelling operation. Forestry Tasmania advised that a proportion of this wood could be utilised through log processing yards as envisaged for the Southwood project, with a further substantial proportion being utilised for power production.

Forestry Tasmania conceded that occasionally merchantable logs do get left and that where this occurs they have to accept the criticism and try to improve recovery rates.



Evidence was received from the Forest Practices Board that the Forest Practices Code does not contain provisions relating to utilisation standards.

The RFA does not explicitly address the issue of appropriate utilisation standards except from the perspective of providing for improved technology to assist in increasing the recovery of sawlog material from poorer grade trees. This issue is covered in the Wood and Wood Products Industry Development chapter of this report, in particular Table 5.1 and section 5.7.

4.19 Climate change

4.19.1 Background

In Clause 88 of the RFA the Parties agreed to a set of research priorities listed in Attachment 13. One of the priority areas for research relates to climate change, and carbon budgets and flows in forests. Criterion 5 of the Sustainability Indicators Report also addresses the general issue of monitoring forest contributions to global carbon cycles.

The Background Report presents the information available from the first phase of the National Carbon Accounting System on estimated forest biomass in Tasmania. The Australian Greenhouse Office has since released the update of the National Carbon Accounting System.

4.19.2 Issues

A number of submissions referred to the link between forestry operations and climate change. The issues raised were:

- the impact of removal of forest cover on local hydrological cycles and on local and even regional rainfall patterns;
- the net production of greenhouse gases as a consequence of converting carbon stored in standing forest or peat soil into carbon dioxide. Evidence was received that the net carbon storage in Tasmanian managed forest would decrease as the mean age of the forest declined from that determined by a natural cycle to one determined by the optimum harvesting age. Comparisons were drawn between carbon stored in old growth eucalypt forests and regrowth plantations;
- the practice of clearfelling and burning forests was contributing to the greenhouse gas production; and
- the proposed use of logging waste in a power generating boiler would contribute to the greenhouse gas pool.

4.19.3 Analysis

A submission noted the increased occurrence of drought on the east coast and linked it to the extensive land clearing that followed the introduction of woodchipping in the 1960s and 70s. Consideration of this issue is outside the Terms of Reference of this review.



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The net area of land under either natural or managed forest has increased in the last five years as a result of the establishment of plantations, some of which have been established on cleared agricultural land.

The release of greenhouse gases depends on the balance in the cyclical process of carbon storage in growing vegetation, and its subsequent release to the atmosphere as a result of the death of a plant, and its rotting on the forest floor or being burnt. Carbon accounting at this level is a very complex issue (See *Greenhouse Gas Emissions from Land Use Change in Australia*, Australian Greenhouse Office, May 2002). The carbon balance in any forest depends on the age of the forest, the type of forest and the site. In general, the older the forest the more carbon is stored, however, as some forests age and senesce they lose the capacity to hold carbon. For example, a tall wet eucalypt forest with a rainforest understorey will lose the eucalypt overstorey when the eucalypts die and will store less carbon as a result.

A particular burn or harvesting event does trigger the release of substantial carbon to the atmosphere, but is balanced by the subsequent carbon storage in the regrowing forest. There is also no material difference between the effects of a clearfell and burn operation and a natural wildfire in terms of the short or long term carbon balance.

The consumption of forest waste for power generation has the same net effect on carbon dioxide levels as allowing the waste to either rot on the forest floor or be burnt in a regeneration burn. In addition, power produced from wood waste has the potential to replace power produced from fossil fuels.

A further complication is the extent to which harvest and storage of carbon as wood products acts as a carbon sink.

At a landscape level, and over time, the net area of forest is an effective measure of carbon storage. If the net area declines, carbon dioxide will be released to the atmosphere, and if the net area increases, the additional forests will serve as a sink for greenhouse gases.

The net area of forests, both plantations and native forest, has increased in Tasmania during the last five years.

Given that the quantum of carbon stored in a forest is a function of the age of the forest and that generally, younger forests have a lower store of carbon than mature forests, younger forest, typical of actively managed production forests are likely to hold less than more mature forests.

The significance of forest industry operations on greenhouse gas emissions is a very complex issue and is beyond the scope of this review to determine. The Commission does find however, that the Parties have met their commitments to maintain a focus on greenhouse gas research, and have reported the available information against Criterion 5 of the Sustainable Indicators.



4.20 Ecologically Sustainable Forest Management in the Comprehensive, Adequate and Representative reserve system

4.20.1 Background

The RFA provides for the provision of \$1 million for new reserve management (Clause 101(iii)). The Background Report advises that these funds were spent on providing signage and visitor infrastructure for the new public reserves proclaimed as result of the RFA. Tasmania made commitments in Clause 24 to implement and manage their components (exclusive of Commonwealth land) of the reserve system in accord with the RFA, and in particular, requirements specified in Attachments 6 and 7. In Clause 51 the Parties agree to establish the Comprehensive, Adequate and Representative reserve system and manage the system to maintain the Comprehensive, Adequate and Representative values for their lands consistent with the management objectives of the land tenure elements of the reserve system.

Attachment 10.11 provides for the development and implementation of a Code of Practice for Reserve Management by 2000.

4.20.2 Issues

A submission on the Background Report raised concerns that there were very limited funds available to undertake management in the forests of the reserve estate. Reference was made to the poor state of walking tracks, lack of signage and generally poor provision of infrastructure for users.

A submission was received in response to the Draft Recommendations Report concerning the lack of funding for fire protection and control of pests and diseases in reserves.

4.20.3 Analysis

There is no particular commitment in relation to the provision of funding to maintain the public reserve estate, except the provisions of Clause 101(iii) to provide \$1 million for the establishment of new reserves. These funds have been provided as required and the milestone has been met. The management of the Comprehensive, Adequate and Representative values and the reserve system are fundamentally important to the RFA and meeting conservation requirements of Ecologically Sustainable Forest Management. The Commission considers that the Parties need to investigate the level of financial and staffing support given to managing Comprehensive, Adequate and Representative values including fire management and pest and disease control in the reserve system.

The Background Report states that development of the Reserve Management Code of Practice is yet to be completed. The draft Reserve Management Code of Practice was released for public comment in 2001 and is expected to be finalised in 2003. The Commission finds that while substantial progress has been made on developing the code of practice for reserve management, the milestone has not been met. (see section 4.5).



4.21 Old growth forest management

4.21.1 Background

The RFA makes a number of commitments on inclusion of old growth forest in the reserve system. These are addressed in chapter 3 of this report. Otherwise, the RFA provides for the continued logging of old growth forest outside of the reserve system. The old growth forests outside reserves are managed for a variety of purposes including as regenerated native forest, plantations or as Special Timber Management Units.

4.21.2 Issues

Continued logging of old growth forest is one of the more contentious issues raised in submissions.

A number of issues were raised ranging from very general opposition to logging of old growth forest, to specific issues related to the method of harvesting of old growth forest. These latter issues are canvassed in section 4.22 below.

Issues relating to reservation of old growth are dealt with in chapter 3.

A number of submissions on the Background Report, the Draft Recommendations Report and in hearings, raised concerns about the importance of old growth forest for threatened species conservation. These are dealt with in section 4.6 above.

The importance of old growth forest as a carbon store was raised as an issue and is addressed in section 4.19.

The issue of the definition of old growth was raised by some submitters who asserted that the old growth had not been mapped properly or the wrong definition had been used. As a result it was asserted by some submitters that old growth had been under-represented in reserves.

The Commission received evidence in a hearing, other submissions on the Background Report that most conservation groups considered old growth forest to be areas of forest that have had minimal disturbance by human agencies, and in particular direct modification by logging. It was said that this could include areas of regrowth, caused by wildfire, in larger areas that have an ecologically mature component.

Other submissions referred to present old growth forests as proportions of the forest existing prior to European settlement, with the implication that all pre-European settlement forest was old growth. This clearly implies the use of a definition based on the absence of disturbance, as opposed to the RFA definition that includes the requirement for the forest to be ecologically mature.

Concern was expressed that old growth wet eucalypt forest in reserves would convert to rainforest with the passage of time, and without appropriate management intervention.



4.21.3 Analysis

The balance between reservation and logging of old growth forest has been determined by the Parties in the RFA and is not an issue for this review.

The Commission notes comments made by a number of submitters about errors in the mapping of old growth forests. The Commission received submissions about the definition of old growth forests and associated statistics. The mapping differences relate to whether the RFA definition, which has both disturbance and ecological maturity dimensions, is applied or whether the definition used is based on the absence of significant human disturbance. Differences in interpretation also relate to variations in mapping scale, and the size of individual patches of old growth forest embedded in, or adjacent to, regrowth forest patches. The Commission is of the view that the issues about RFA old growth definitions and associated statistics are a result of a reinterpretation of information available at the time of the preparation of the RFA, rather than new information.

The Parties agreed to use the definition of old growth, agreed at a national level, in the National Forest Policy Statement and as defined in the JANIS Report. The old growth forest of Tasmania was classified and mapped according to that definition, and that mapping accredited by the Parties to the RFA. The issue relating to the definition of old growth forest is not a matter for this review.

Forestry Tasmania advised at the hearing that the senescence of old growth wet eucalypt forest is recognised as a potential issue. However, this is unlikely to be an issue for some decades to come and should be monitored on the time scale of the RFA.

For the Tasmanian RFA old growth was broadly defined as ecologically mature forest where the effects of disturbances are now negligible, consistent with the definition in the National Forest Policy Statement and used in other Australian RFAs.

During the RFA process in 1996, old growth was mapped by classifying forests according to the proportion of senescent crowns in each stand and their history of disturbance by fire, harvesting and grazing. To determine old growth forest as at 30 June 2001, the 1996 dataset was updated by reducing the mapped extent of old growth stands to reflect harvesting and clearing operations during that time. No new mapping of crown senescence or fire disturbance was undertaken as these events were deemed to be of minor significance during that time.

During the five year period, 7,100 hectares of old growth has been harvested. This represents a small proportion (0.6 per cent) of the 1996 extent, with most of the losses occurring in the wet eucalypt forest communities. The native forest old growth communities in which the biggest losses were recorded were *E. delegatensis* and tall *E. obliqua*. Smaller losses were recorded in *E. regnans*, callidendrous and thamnic rainforest, dry *E. delegatensis*, *E. pulchella/globulus/viminalis* grassy shrub forest, and *E. obliqua* forest.

The Commission finds that, as at 30 June 2001, as a result of implementing the Comprehensive, Adequate and Representative reserve framework agreed under the RFA, an additional 168,900 hectares of existing old growth has been protected (an extra 25 per cent of the 1996 area). As a result, 850,000 hectares, or approximately 69 per cent, of old growth in Tasmania is now protected. This represents a significant increase in the protection of old growth.



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Of the 42 forest communities in which old growth was mapped for the RFA, 19 have met or exceeded JANIS quantitative reserve criteria. A further 15 old growth communities have met the practicable reservation limit on public land. Eight old growth communities have been reserved at slightly lower levels to avoid social and economic impacts, under the flexibility provisions of the JANIS criteria.

The Commission is of the view that old growth harvesting has occurred at a relatively low level and in accordance with the RFA. The Commission notes that the Tasmanian Government has expressed the intent to reduce the reliance on old growth forests and in particular to phase out clearfelling of old growth forest (Department of Premier and Cabinet, 2002). The Commission notes that phasing out should occur as the forestry industry becomes more driven by downstream processing of sawlogs and more reliant on regrowth, regeneration and plantation sourced timber (as depicted in Figure 5 of the *Sustainable High Quality Eucalypt Sawlog Supply from Tasmanian State Forest Review No. 2*, Forestry Tasmania, May 2002).

4.22 Clearfelling versus selective logging

4.22.1 Background

There are a variety of silvicultural methods applied to forest management in Tasmania including clearfelling, selective logging and thinning. A number of silvicultural methods including island retention, strip retention, seed tree retention and group selection are being explored as alternatives to clearfelling.

Clearfelling and burning is the preferred silvicultural method for logging and regenerating wet eucalypt forests. It is provided for in the RFA as part of the accredited Forest Management System practiced in Tasmania.

The RFA identifies, in Attachment 13.7, for priority to be given to research into the *Commercial viability of new and alternative silvicultural techniques especially for harvesting and regenerating wet eucalypt forest ...*

There are a number of references in the RFA to application of other silvicultural systems for special species timbers.

4.22.2 Issues

In submissions on the Background Report, and during hearings there was a range of positions put forward on logging, clearfelling, harvesting and selective logging practices. This was further complicated by differing views on the application of these practices to old growth forest, tall forest, wet forest, dry forest and high altitude forest. From this the following issues can be distilled:

- can selective logging of wet forest types be practiced without degrading the economic potential of the forest or risking the safety of forest workers?
- are alternative silvicultural scenarios available?



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- is clearfelling more destructive of forest biodiversity, ecosystem services and cultural heritage values than other harvesting scenarios?
- does selective logging through the retention of logging residue contribute to increased fire hazard? and
- is clearfelling more wasteful of the wood resource than selective logging?

Forestry Tasmania provided evidence to the Commission that the silvicultural trials being conducted in the Warra Long Term Ecological Monitoring site were, in part, directed at researching the commercial viability of selective logging regimes.

4.22.3 Analysis

This issue is not relevant to the Terms of Reference except in the context of continuous improvement of Forest Management Systems. The Commission notes that Forestry Tasmania has a significant commitment to exploring alternative silvicultural regimes for the management of wet eucalypt forest through the Warra Long Term Ecological Research Site and considers that this is both appropriate and necessary. Further discussion of this trial is in section 6.2 of this report.

4.23 Private lands management system

4.23.1 Background

The Parties agree in the RFA to a series of undertakings aimed at ensuring the conservation and management of forests on private land. Under Clause 58, the State reaffirmed commitments to:

- ensuring ongoing private forest compliance with the Forest Practices Code;
- ensuring that adequate mechanisms were in place to protect State and regional nature conservation and catchment values on private land; and
- to carrying out the initiatives specified in Attachments 9, 10 and 11.

Undertakings relating to forest values on private land include the following commitments to:

- ensure regeneration and reforestation rules for native forests and plantations are abided by (Attachment 9.7); and
- introduce mechanisms to encourage native vegetation retention and management by 1999 (Attachment 9.8).

4.23.2 Issues

Matters raised in submissions and hearings on the private forest management system included:

- private forestry exemption from planning schemes; (see section 8.2)
- inadequate land clearing controls; (see section 4.12)
- inadequacies in threatened species management on private land; (see section 4.6)



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- lack of a private forest sustainable yield strategy;
- inadequacy of regeneration data on private lands; and
- inadequate management of tree fern harvesting (see Attachment 12.29 of the RFA).

4.23.3 Analysis

The RFA does not contain a commitment for a sustainable yield strategy to be developed for private land. The Commission was advised by the Reference Panel that this issue was considered during the development of the RFA, but not included due to a range of difficulties including the large number of different forest owners with different forest management intentions and the uncertainty of resource and yield data for private forest.

The Commission notes that the commitment in Attachment 9.7 of the RFA for regeneration of private lands following harvesting was not included in the Scoping Agreement's list of commitments to be considered in this Review. Neither is any information provided in the Background Report. The Commission considers this may have been an oversight by the Parties.

While the RFA requires the monitoring and reporting of reforestation standards, success and trends (Attachments 10.12 and 11.3) this does not occur on private lands which is a deficiency. Such information would be usefully incorporated into Sustainability Indicator 2.1.g.

Tree fern management on both private and public land is now controlled by a Tree Fern Management Plan and under recently approved amendments to the *Forest Practices Act 1985* (Tas). This will lead to improved management of tree fern harvesting.

4.24 Accreditation

4.24.1 Background

Under Clauses 65 and 66 the Commonwealth accredited Tasmania's Forest Management System, and the processes for determining high quality eucalypt sawlog and veneer log sustainable yield for public forests. The Commonwealth accredited the Forest Management System, as amended by the RFA, including improvements specified in Attachment 10, and public reporting and consultative mechanisms specified in Attachment 11. Accreditation of the Forest Management System was based on the recommendations of an independent expert advisory group (Public Land Use Commission, 1997a).

The Commonwealth also accredited the process being used by Forestry Tasmania, and described by Turner and Brack (1996), for determining high quality eucalypt sawlog and veneer log sustainable yield for public land.

In Clause 67 the State confirmed that the sustainable yield for the public forest estate would continue to be based on areas available for timber harvesting outside the Comprehensive, Adequate and Representative reserve system.



4.24.2 Issues

An issue for this review relates to the extent to which progress had been made in implementing Attachments 10 and 11, and the effectiveness of these, during the first five years of the RFA.

The integrity of the system for calculating the sustainable yield of high quality eucalypt sawlog and veneer log on public land was also raised as an issue. This is further discussed in section 6.1 of this report.

The Commission received a submission in response to the Draft Recommendations Report asserting that by virtue of Clauses 62 and 63 of the RFA, the State had an ongoing obligation to continually develop and improve its Forest Management System in line with Ecologically Sustainable Forest Management principles. This submission referred to the emphasis in both the National Forest Policy Statement and the RFA on the value of integrated forest management systems as an important requirement for the implementation of Ecologically Sustainable Forest Management. It is asserted that at present, the most important and pressing area in need of development and improvement in Tasmania's Forest Management Systems is the effective integration of those systems, highlighting a perceived dislocation between the Forest Practices System and the Resource Management and Planning System. This issue is discussed in section 8.2 of this report.

Another submission on the Draft Recommendations Report raised the Independent Expert Advisory Group (Public Land Use Commission 1997a) Report's recommendations and how they had been developed to continually improve the Forest Management System.

4.24.3 Analysis

As recognised in the RFA, Ecologically Sustainable Forest Management is an objective, which requires a long term commitment to continuous improvement. The State undertook to further improve its forest management system as specified in Attachments 10 and 11 of the RFA. As reported in this chapter and chapter 9 of this report, the State has met most of its obligations for the first five years in relation to Attachments 10 and 11, and is making and planning further progress on the remaining commitments. As well, additional improvements to the Forest Management System have been made or are in processes of being implemented. In particular, Forestry Tasmania developed and implemented its Environmental Management System to a level where it received ISO 14001 standard certification in November 2001.

The Commission considers that the commitments contained in Attachments 10 and 11 should stay on the Parties' agenda as further progress could be made toward the original commitments. The Parties should consider the recommendations of the Independent Expert Advisory Group (Public Land Use Commission 1997a) in the design of further measure for continuous improvement of the Forest Management System.



5. *Wood and wood products industry development*

5.1 General

5.1.1 Background

The wood and wood products industry is a major employer and contributor to the Tasmanian economy. Through Clause 74 of the RFA a series of actions were identified in Attachment 12 to help develop and enhance the growth of Tasmanian forest based industries, particularly those associated with forest and timber products. It is these actions that are addressed in this chapter. Specific actions and commitments associated with sawlog sustainable yield and special species timbers are discussed in chapter 6. Other actions in Attachment 12 dealing with other forest based industries are addressed in chapter 7.

The Commonwealth provided Tasmania with \$80 million to support the implementation of the Employment and Industries Development Strategy initiatives contained in Attachment 12. These included the new intensive management initiatives designed to ensure a sustainable yield minimum target of 300,000 cubic metres per year of high quality eucalypt sawlogs and veneer logs, and 10,000 cubic metres per year of blackwood sawlogs.

Future wood and wood products industry growth and development was to be achieved through the following elements, some of which are discussed elsewhere in this report:

- certainty of resource access to the forest industry;
- removal by the Commonwealth of the need for export licences for unprocessed wood and woodchips sourced in Tasmania;
- active encouragement of the development of downstream processing in Tasmania such that the preferred market for growers is within the State;
- a range of new or enhanced initiatives designed to encourage investment, plantation development, downstream processing, value adding and jobs growth; and
- the implementation of new intensive forest management initiatives, including eucalypt and blackwood plantations, and native forest thinning, to balance changes in forest inventory resulting from the RFA and expand that inventory.

The actions in Attachment 12 do not have specified milestones, as most are ongoing and designed to be delivered during the full 20 year period of the RFA.

5.1.2 Issues

Submissions on the Background Report, Draft Recommendations Report and at hearings raised many general issues concerning the implementation of Attachment 12 and associated sustainability indicators including:



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- the RFA, and in particular Attachment 12, has not had the intended effect of enhancing the future growth and development of Tasmania's industries associated with forest and timber products. A critical analysis is needed of the factors leading to the failure in delivery of Employment and Industries Development Strategy;
- the intent of the Parties was not clear – there are ambiguities in language found in the Strategy, likely outcomes and actual realisation of the Strategy; and
- there is a need for a specific vision and strategy for Tasmania's forest and forest products industry that provides optimum balance across all sectors of the industry (eg industrial and small scale processing, specialty timbers, craftwood, furniture, boat building, apiculture and other non-wood forest products) that also takes into account recreation and nature based tourism (see section 7.2).

5.1.3 Analysis

The Commonwealth provided Tasmania with \$80 million to implement Attachment 12. The Background Report reports that funds have been provided and appropriately acquitted.

The Background Report provides details of progress by the Parties in implementing the actions required by Attachment 12. These are discussed elsewhere in this report in the relevant sections.

The Commission received a wide range of submissions that indicated a general lack of understanding of the intent of the Parties in Attachment 12. The development of the forest industries, particularly investment in new value adding domestic processing of Tasmania's forest resources, with resulting increases in employment, remains a key objective of the RFA. However, these developments can only be provided by the private sector and governments can largely only facilitate this growth. As there are no specified milestones for Attachment 12 commitments, a judgement of their success or otherwise, cannot be determined at this first five year review, but they should continue to be reviewed at future five year reviews.

5.2 Legislation to support the RFA

5.2.1 Background

The Commonwealth undertook in Clause 22 of the RFA to use its best endeavours to secure legislative changes designed to:

- remove woodchip export controls for wood products sourced from the area covered by the RFA;
- remove forestry operations, subject to the RFA, from the ambit of a suite of environment and heritage protection legislation; and
- provide a process for termination of the RFA.

The Commonwealth also committed in Clause 23 to timely consultation with affected States and to introduction of the legislation to the Commonwealth Parliament by 30 June 1998.

The above legislation included further provisions to give effect to the compensation clauses found in Part 3 of the RFA.



5.2.2 Issues

Several submissions on the Background Report and made at hearings, saw the lifting of Commonwealth export controls as a negative development because it led to the increased rate of harvesting of woodchips. Other submissions commented that the legislation was crucial to the industry, and that the delay in passing the legislation had a negative impact on industry investment decisions.

5.2.3 Analysis

The intention of the proposed legislation was to provide a degree of resource security for the forest industry in return for the industry undertaking to deliver on the ecological sustainability measures contained in the RFA.

The Commonwealth met all its commitments in respect of Clauses 22 and 23 of the RFA.

A Regional Forest Agreements Bill was first introduced into the Commonwealth Parliament on 30 June 1998 and passed in April 2002.

The *Environment Protection Biodiversity Conservation Act 1999* (Cth) exempts forestry operations authorised under a RFA from the requirement to obtain an environmental approval under the Act if the operations are carried out in accordance with the RFA.

The *Export Control (Regional Forest Agreement) Regulations 1997* (Cth) exempt all Tasmanian woodchips and processed wood exports, from export controls by virtue of the fact that they are covered by the provisions of the RFA.

5.3 *Downstream processing, employment and industry transition*

5.3.1 Background

A key objective of the Parties, expressed in the Recitals to, and Clause 74 of, the RFA, was to provide a range of new or enhanced initiatives designed to encourage investment, downstream processing, value adding and jobs growth. The following specific actions are contained in Attachment 12:

- continuing the funding of research into new processing technologies and market opportunities to assist the transition from old growth to regrowth and plantation resources (Attachment 12.18);
- Tasmania to amend the terms of reference of the Forests and Forest Industry Council to provide advice on the encouragement of downstream processing, such that the preferred market for growers is within the State (Attachment 12.19); and
- the Commonwealth to facilitate industry development, through Forest Industry Structural Adjustment Program funding and other programs, by providing assistance for sawmilling industry redevelopments on a case by case basis, and encouraging the use of Crown Cut regrowth veneer in Commonwealth projects (Attachment 12.21).



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A range of more general initiatives that assist industry development including training, information, marketing and research and development is addressed later in this chapter.

A range of generic industry development actions is contained in Attachments 12.4-12.9.

5.3.2 Issues

The following issues were raised in submissions on the Background Report, the Draft Recommendations Report and made at hearings, concerning downstream processing, employment, value adding, domestic processing and industry transition.

- the objective of increasing downstream processing, particularly within Tasmania, has been ineffective and slow to be achieved. This has been particularly demonstrated by the significant increase in levels of woodchips exported since the RFA. The Parties have not been active enough;
- the impact the delay in passing of the Commonwealth's RFA legislation had on industry investment (see section 5.2);
- the perceived imbalance in the attention that the industrial scale forest industries (sawmilling, panels, pulp and paper) receive compared with the smaller scale industries such as craft and furniture;
- the future of the native forest based industry lies in high value and quality niche market products, rather than commodity products, such as fibre and construction grade timbers and veneers;
- industry employment has decreased since the RFA, and value adding industries such as the Burnie pulp mill have closed;
- the RFA was achieving its employment and industry objectives;
- lack of quality information on value adding, employment and investment makes it difficult to gauge how well the RFA is achieving its objectives; and
- inability of Tasmanian industry to access funding under the Commonwealth's Forest Industry Structural Adjustment Program to assist the sawmilling industry to restructure.

5.3.3 Analysis

The Background Report describes progress on a range of relevant commitments in Attachment 12.

It is difficult to ascertain what progress has been made in achieving increased investment, downstream processing, and employment in the wood products industry during the last five years. The Commission heard evidence, and had submissions tabled at the hearings by submitters demonstrating that there has been investment by the industry as a result of the RFA, but the scale and value of this investment has not been accurately quantified. Included in this investment are many examples of value adding by the hardwood sawmilling sector, the purchase by Gunns Ltd of North Forest Products and Boral Timber Tasmania, the purchase of a 50 per cent share of Forestry Tasmania's softwood plantations by GMO Resources, and the very large investment in new plantations by the private sector in the last five years. Sufficient accurate data to support such an analysis was not available to the Commission. This lack of social and economic data is further discussed in section 5.4.



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Industry submissions acknowledged that industry development and downstream processing has not progressed as quickly as might have been expected largely due to the delay in passage of Commonwealth legislation. Substantial industry restructuring has also contributed to the lack of progress although, at the enterprise level, investment and developments did take place. The role of the Tasmanian Forests and Forest Industry Council has been an important one, providing a link between industry and Government.

Investment in industry development and value adding is largely provided by the private sector. Government's role is largely to support growth through providing the right investment climate, including access to secure resources, marketing investment opportunities, assisting with the planning and approval process and providing supporting infrastructure. The Commission considers that judgements about the success of the Parties in delivering the RFA economic objectives will be best made in the longer term over the full RFA period. There is a long lead time in the development and establishment of projects requiring significant investment decisions and planning issues. For example, the Southwood proposal is an example of a planned investment in downstream processing and value adding of wood that will deliver substantial economic benefits. The planning and approval of this project has already taken several years.

The Commission has made Recommendation 5.2 for the Parties to clarify their intentions as to how the objectives and actions in Attachment 12 are to progress in future years. Several issues are identified in Table 5.1 that should be specifically addressed to assist future industry investment.

Attachment 12.21 is unambiguous in committing the Commonwealth to facilitate industry restructuring through the Forest Industry Structural Adjustment Program. The Background Report states that no such funding has been provided. The sawmilling industry has submitted that it has not been successful in obtaining access to these funds to assist its restructure to adapt to the increased volumes of regrowth and plantation grown timber arising from the RFA outcomes. Irrespective of the amount of funds provided by the Commonwealth to the Tasmanian Government under other funding programs, industry should have access to the Forest Industry Structural Adjustment Program and other funding programs pursuant to this RFA commitment. The Commission was informed that lack of access to Commonwealth funding programs was also adversely affecting investment in other components of the industry. Some examples are small growers, special species timbers and woodcraft, furniture, and boat building, which through improved utilisation, products and markets would lead to higher investment and employment.

5.4 Industry information and monitoring

5.4.1 Background

The Parties agreed to a number of actions in Attachment 12 to improve information available to the industry to assist its development and competitiveness. In Attachment 12.8 the Commonwealth agreed to continue to provide advice and assistance to the industry through programs in the areas of research, commercialisation, business planning, business networks, licensing and innovation. In Attachment 12.9 the Commonwealth agreed to continue funding of a dedicated Forest Industry Client Manager to



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promote the development of the industry in Tasmania. In Attachment 12.19 the State agreed to support the development, by industry, of comprehensive reports on market trends, commodity and log price information, and supply and demand factors. It also agreed to maintain an internet site on Tasmanian Timber to provide the industry with new methods of marketing its products.

The Background Report provides data on a number of sustainability indicators important for monitoring industry development and resource use. Included in such a list are Sustainability Indicators:

- area of forest land available for timber production (2.1.a);
- area, age class and yield of plantations of native and exotic species (2.1.c);
- value and volume of wood and wood product production (6.1.a);
- value of wood and non-wood products production as a percentage of regional value of production (6.1.d);
- direct employment in the forest sector (6.5.a); and
- average wage and injury rates within the forest sector, as well as a number of research indicators (6.5.b).

5.4.2 Issues

The Commission received submissions on the Background Report and at hearings that noted that in 1999 the Commonwealth had ceased to continue funding of a dedicated Forest Industries Client Manager to promote the development of forest based industries in Tasmania (Attachment 12.9), which would have included downstream and local processing and markets. It was claimed that this position was seen by the industry as an important initiative that should continue to be funded and that the removal of this position had adversely affected development of downstream and local processing opportunities in the sawmilling sector. The Department of Agriculture, Fisheries and Forestry Australia confirmed that funding for the Client Manager position ended when the Wood and Paper Industry Strategy Program wound up in 1999.

Criticism was made concerning a lack of comprehensive public reports on market trends, commodity and log pricing information, and supply and demand factors as required by Attachment 12.19.

The Commission received a range of submissions that raised issues concerning the accuracy and adequacy of data that measure the social and economic outcomes of the RFA, particularly in the areas of forest industry employment and the changes that had happened since the RFA. Some of the issues raised were:

- the lack of quantitative and reliable information that was available for monitoring and reporting industry development, social and economic impact and resource use;
- the need for more comprehensive information on social, economic, resource and industry issues and trends through periodic assessments like those undertaken during the Comprehensive Regional Assessment process and reported in the 1996 Comprehensive Regional Assessment and by Australian Bureau of Agricultural and Resource Economics (1997); and
- the non-reporting of export data associated with pulpwood logs and woodchips.



5.4.3 Analysis

The Background Report provides detailed information on the achievements of the Parties towards meeting these ongoing commitments. It is difficult for the Commission to judge how adequately these actions have been implemented.

A specific issue raised concerning the Client Manager position appears to be clearer. The Department of Agriculture, Fisheries and Forestry Australia have advised 'while it is not specified in Attachment 12 of the Tasmanian RFA, it was clear from the outset that Wood and Paper Industry Strategy funding for the position was only available until 1999...' This is a specific issue that the Commonwealth should address in consultation with Tasmania, and industry, to determine the ongoing need of such a position.

It is noted that the informative market and pricing information reports produced by Private Forests Tasmania will soon cease production, as funding under the Natural Heritage Trust has expired. These reports have proved very useful to growers and the industry. Alternative means of continuing to provide similar information should be investigated.

Another area warranting further consideration is industry profiles. The Tasmanian Department of State Development produced a forest industry audit in 1999. Similar profiles of the industry should be prepared at periodic intervals in order to provide factual information to the public, and industry, on the composition and value of the industry to the economy.

The Tasmanian timber internet site www.tastimber.tas.gov.au appears to be very successful in providing comprehensive information on Tasmanian Timbers and an avenue for the e-trading of timber.

The Background Report provided a range of data on the social and economic indicators and trends. The Report acknowledges the difficulty of obtaining accurate, comprehensive and comparable data that allows meaningful analysis. Such data derived from periodic reassessments would establish comprehensive information on Tasmanian forests and forest industries. This would help the Parties and stakeholders in establishing future actions to achieve the desired objectives of the RFA. Better information on industry specific employment, supply and yield of wood and non-wood resources, industry economic information and social impact were identified as priorities in submissions and hearings.

The Australian Bureau of Agricultural and Resource Economics and the social assessment unit and forest and vegetation programs of the Bureau of Rural Sciences were proposed by submitters, at the hearings, as appropriate bodies able to assist the State in developing appropriate methodology, and in collection of, this information. The Commission notes that the Commonwealth, under the *Regional Forest Agreements Act 2002* (Cth) (Section 10A), is required to establish a comprehensive and publicly available source of information for national and regional monitoring and reporting in relation to all of Australia's forests.

Data on export woodchips is no longer publicly available. Commonwealth privacy laws mean that the Australian Bureau of Statistics cannot publicly report information that might identify a particular business or organisation. Similarly, Forestry Tasmania, and any other business, do not make price information on its log sales available to the public as they consider it commercial-in-confidence.



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Public transparency would be increased if improved data on the volume and value of all wood products produced in Tasmania were publicly available (see Table 5.1). Data for Sustainability Indicator 6.1a in particular could be improved.

A number of submissions on the Background Report, Draft Recommendations Report and made at hearings, identified the need for better and more comprehensive employment data. Conflicting claims were presented, using different data sets, about changes in industry employment. Some, using Australian Bureau of Statistics wood products industry figures claimed that employment had decreased as a result of the RFA. Others, citing other reports, claimed that employment in the industry was much larger than the Australian Bureau of Statistics figures, and has grown in the last five years. Irrespective of the data it is incorrect to claim any changes in gross employment figures are as a result of the signing of the RFA, as there is no way of knowing what would have happened to employment in the absence of the RFA.

Accurate employment figures for the whole forest industry, including non-wood sectors, needs to be collected, as current figures are not informative and submissions reported that figures could be misleading. Several submissions on the Background Report, Draft Recommendations Report and made in hearings, proposed that the Australian Bureau of Agricultural and Resource Economics should be requested to develop methods to gather improved employment statistics specific to the forestry industry. Submissions suggested that employment figures should be broken into discrete categories such as:

- native forest logging;
- hardwood plantation operations;
- softwood plantation operations;
- industrial scale sawmilling;
- small scale sawmilling;
- specialty timber industry including woodcraft and boat building;
- wooden furniture industry;
- woodchip industry;
- pulp and paper;
- forest management;
- supervision and monitoring of the Forest Practices Code;
- transport of forest product and associated dependent industry;
- forest based recreation and tourism;
- non-wood product industries;
- forest based apiary industry; and
- industry in forest dependent towns.

The Commission considers that the Parties, with assistance from industry, should undertake periodic resource, economic and social assessments. Such assessments are to provide comprehensive, publicly available, information on employment, use and yield of forest resources on public and private lands, as well as industry economic and social information. Further, the Parties should request the



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Commonwealth Research Bureaus (particularly Australian Bureau of Agricultural and Resource Economics and Bureau of Rural Sciences), to actively work on the development of socio-economic (Criterion 6) indicators. The Commonwealth Research Bureaus should also be requested to repeat resource, economic and social studies undertaken for the Comprehensive Regional Assessment process undertaken prior to the RFA. This information should be available, reported and compared, for five yearly reviews of the RFA, and to help monitor and provide statistics on employment, industry development and social impact.

Recommendation 5.1

That the Parties, as a priority, develop a process to obtain reliable data to inform social and economic indicators for the community, and the performance of the forest based industries relevant to Attachment 12 of the RFA. The sustainability indicators relevant to the social and economic aspects of the industry need to be reviewed when such reliable data becomes available.

5.5 Public education and information

5.5.1 Background

Attachment 12.18 commits the Parties to continue to support programs to educate the public on issues of forest management and on the suitability of wood as an environmentally acceptable raw material for a wide range of uses.

5.5.2 Issues

In several submissions on the Background Report and made at hearings, public education about forest management practices, and the social and economic benefits that the industry provides, was seen as an area where more Government and industry effort was required. Education and information for the community was seen as necessary to ensure accountability on management, sustainability, and high value uses of forest products. Specific mention was made of the excellent work done by the Tasmanian Forest Education Foundation and the need for maintaining support by the State and industry. The need for the Parties to promote the sustainability of Tasmanian wood products in domestic and international markets was also raised (see section 5.10).

Submissions on the Draft Recommendations Report advocated that there be a public education and information program on the RFA, on forest management and as a key component of any industry development strategy and warrants a stand alone recommendation.



5.5.3 Analysis

The Background Report provides information on activities that the Parties are supporting to improve public education on forestry and wood. While these programs have substantial benefit, it is obvious that much still needs to be done to better educate the public on forestry issues. The Commission heard many views in submissions and hearings that demonstrated a lack of knowledge and misconceptions about the RFA, the industry, forest management and the regulatory and institutional framework in which it operates. The continuing public debate on forestry could be much improved if it was based more on facts rather than perception and misinformation. It is acknowledged that this is not an inconsiderable task.

The Commission considers that the Parties should more actively work with industry to improve public understanding through the development of programs and outputs about forest management issues, the RFA, and the social and economic benefits that the industry provides to the Tasmanian and national economies. This matter needs to be addressed in implementing Recommendation 5.2.

5.6 Industry training

5.6.1 Background

Training is an important means of improving environmental, social and economic outcomes, including the health, safety and productivity of those that work in the industry. Attachment 12 contains a number of actions for forest industry training. In Attachment 12.6 the Parties agreed to facilitate the coordination of programs between governments, industry and training providers to ensure efficient and effective delivery of training. In Attachment 12.7 the State agreed to work with industry to co-ordinate on the job training curricula with TAFE, the University and other training providers.

In Attachment 12.23 the Commonwealth agreed to:

- facilitate skills development in enterprises and workplaces through development of best practice programs within the harvesting, sawmilling and furniture manufacturing sectors;
- promote and market National Vocational Education Training packages in the forest and ecotourism sectors;
- encourage Tasmanian applications for funding under the Industry Skills Centres Program; and
- encourage the uptake of the New Apprenticeships Program.

In Attachment 12.24 the Parties agreed to jointly facilitate skills development in the industry by encouraging Australian National Training Authority assistance and encouraging the adoption of the Commonwealth's School – Industry Links Demonstration Program by local forestry businesses.

5.6.2 Issues

No submissions were received on these commitments.



5.6.3 Analysis

The Background Report detailed information on progress to meeting these ongoing commitments. The Commission is not aware of any issues concerning the implementation of these actions. However, it notes that information on the Tasmanian component of the National Vocational Education Training program (Attachment 12.23) is not available to indicate what level of assistance has been provided. It is considered that the Parties should continue to give a high priority to the facilitation of industry training as a means to assist in the delivery of continuous improvement of sustainable forest management, including industry growth and development.

Evidence was provided by Forestry Tasmania at the hearings that the industry has recently developed a Log Supply Charter. A key objective of the Log Supply Charter is the development of an industry quality assurance system to improve the recovery of high value products throughout the supply chain. A key requirement for such a system will be the training and accreditation of workers.

5.7 Industry research and development

5.7.1 Background

Attachment 12.15 provides for the Parties to support research and development into alternative, chemical free pest and weed control systems for intensively managed forests.

Attachment 12.18 provides for the Parties to continue funding of research and development into new processing technologies, value adding and market opportunities to assist industry in the transition from old growth to regrowth and plantation material.

5.7.2 Issues

A submission by the Forests and Forest Industry Council at the hearings provided additional information on research and development of forest products. The submission also requested support for the proposed Co-operative Research Centre for Tree Technology to help advance a research base that would support the long term needs of the plantation and native forest wood product industry, particularly within Tasmania.

The Commission also heard in hearings that the industry was still experiencing significant difficulties with processing wood derived from young regrowth forest and plantations into solid wood products, particularly sawn timber. Tasmanian timbers were said to have uniquely difficult drying and sawing properties that were not well understood. The slow progress in resolving these problems was said to be placing the industry at risk, given the expected rapid increase in this type of material to be harvested in the future.

Comment was also made in submissions about the need to undertake more research on the use of small piece size material, and short lengths of high quality wood to improve utilisation and value adding.



5.7.3 Analysis

\$1.4 million of RFA funding to Tasmania under Clause 101(ii) was allocated to supplement existing funding to facilitate strategic research and development of new sawing and seasoning techniques, and the commercialisation of new technologies and processes. Little information was provided in the Background Report on research and development outcomes as a result of this funding, although the Commission was advised by the Tasmanian Forests and Forest Industry Council that there is an ongoing research program and that the Council is working towards making the results of this program more widely available. The Tasmanian Forests and Forest Industry Council also commented on the difficulties associated with the Tasmanian resource, the lack of transferability of New South Wales and Victorian research to Tasmanian conditions, and the ongoing commitment of industry to solve the problems.

Research partnerships are currently in place, involving the Forests and Forest Industry Council, CSIRO Forests and Forest Products Division, Forest and Wood Products Research and Development Corporation, forest industry sectors and the Co-operative Research Centre for Sustainable Production Forestry, based in Hobart. These partnerships are developing the knowledge to enable industry to make a commercially viable transition from large size mature wood to smaller diameter less stable regrowth and plantation grown wood.

The Commission is aware that the current round of funding for the Hobart based Co-operative Research Centre will expire in 2003, and that there was an unsuccessful proposal for a new Centre for Tree Technology, to be partly based in Tasmania. The work of the existing Co-operative Research Centre has been vital to improving the knowledge base of the sustainable management of native eucalypt forests and plantations. The current partnership arrangements and research programs could be weakened if there was not a future Co-operative Research Centre focussing on temperate forest management, and the utilisation of wood from regrowth and plantation forests as prosed in the new centre.

The Commission notes that the handling of small piece size material is a significant area for research and development. Such research helps reduce the rate of sawlog type material presently converted to woodchips, and waste. The Commission considers that the Parties, and industry, should increase their efforts in research and development into developing sawing and drying technologies. Such research will allow industry to improve the processing of regrowth and hardwood plantation feedstock to produce value added wood products. A particular emphasis during the next five years could be the development of technology for utilising small piece size sawlog quality material.

5.8 Furniture industry

5.8.1 Background

Attachment 12 of the RFA contains a number of commitments specifically related to the furniture industry:

- Attachment 12.18 commits the Parties to supporting a new emphasis in furniture design and marketing;



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- Attachment 12.19 commits the State to continue to support the Tasmanian Wood Design Collection that includes Tasmanian furniture;
- Attachment 12.23 commits the Commonwealth to develop programs to facilitate skills development within the furniture manufacturing sector, and grants for technology transfer, to assist the sector in the adoption of intricate and high volume computer controlled processing; and
- Attachment 12.27 commits Tasmania to promoting and fostering the further development of a viable wood design industry, and to provide seed funding to boost the marketing role of the Tasmanian Design Development Company, with emphasis on marketing Tasmanian wood design and fine furniture.

5.8.2 Analysis

The Background Report provides information on progress towards meeting the above commitments. The Commission requested, and received, further information on the furniture industry in Tasmania from the Forests and Forest Industry Council.

The Tasmanian furniture industry is continuing to develop. Current employment in the sector is estimated to be between 500 and 600 employees. Industry development in the sector has resulted from the development of a commercial network called Style of Tasmania. The network is a consortium of timber suppliers, designers, component makers, and furniture and fit-out manufacturers. Style of Tasmania contains most of the Tasmanian membership of the Furnishing Industry Association of Australia.

The Tasmanian furniture industry and fit-out sector's competitive advantage over mainland competitors results from (i) access to high quality specialty timber stocks not readily available to interstate competitors, and (ii) a collection of young designers interested in developing the Tasmanian furniture brand and style. Tasmania has supplies of unique cabinet timbers that enable manufactures to supply the high quality production and designer/maker furniture market domestically and internationally. Style of Tasmania has been displayed in Furnitex, which resulted in national and excellence awards in 1999, 2000 and 2001. The development of Style of Tasmania has reversed the downward trends in the Tasmanian furniture industry that was being experienced prior to signing the RFA.

Critical to the continued development of the Tasmanian furniture sector is maintenance and certainty of supply of high quality sawlog resource of both eucalypt and special species timbers. Consistency in quality, quantity and colour, are important attributes of timber resources supplying the furniture industry. Styles and items based on sporadic or opportunistic delivery of resources will curtail the ability of the Tasmanian furniture market to compete and develop their niche in the domestic and international market place. With good management and coordinated resource supply the Tasmanian furniture sector is anticipated to continue to develop and grow during the period of the RFA. However, certainty of supply of cabinet timber now and in the future, as well as labelling that resources are managed sustainably, will be important parameters for the future development of this growing forest product sector in Tasmania.



The Commission notes the solid progress being made on the RFA commitments relevant to the furniture industry, and notes that these commitments are relevant to the full 20 year period of the RFA rather than with a specific milestone.

5.9 Plantations and intensive management initiatives

5.9.1 Background

Under Attachment 12.14 of the RFA the Parties agreed to implement the national *Plantations for Australia: the 2020 Vision* for expanding the plantation estate in Tasmania.

The Commonwealth provided Forestry Tasmania with \$57 million under Clause 101(i) to implement the new intensive management initiative. This initiative was designed to maintain a minimum sustainable yield of 300,000 cubic metres per year of high quality eucalypt sawlogs and veneer logs, and 10,000 cubic metres per year of blackwood sawlogs as outlined in Clause 77. These funds were specifically to replace the sawlog resource withdrawn from industry as a result of the expanded Comprehensive, Adequate and Representative reserve system established by the RFA.

Of the \$13 million provided by the Commonwealth to Tasmania under Clause 101(ii) to progress the implementation of the Employment and Industries Development Strategy, \$10 million was allocated to Forestry Tasmania for additional eucalypt plantation development for sawlog production, thinning, and research as outlined in Attachment 12.15. Therefore, up to \$67 million was provided in total for eucalypt plantation establishment and other intensive forest management activities.

Attachment 12.15 identifies that this funding was to be used to:

- expand the level of intensive forest management of hardwood forest on public land through thinning;
- establish new eucalypt plantations for sawlog production;
- establish new special species resources; and
- support research on intensively managed forests.

The Parties acknowledged in Clause 77 that the new intensive management initiatives in the RFA were designed to provide for meeting the targets of 300,000 cubic metres per year of high quality eucalypt sawlogs and veneer logs, and 10,000 cubic metres per year of blackwood sawlogs.

Under Attachment 12.16 the State agreed to expand the softwood plantation resource to facilitate industry development and employment opportunities.

Under Attachment 12.20 the Commonwealth agreed to facilitate, through its Forest Industry Structural Adjustment Package Program and other programs, industry development in the private sector by expansion of private plantations.



5.9.2 Issues

Many submissions on the Background Report, Draft Recommendations Report and in the hearings, commented on the expansion of the plantation estate since the RFA was signed. Most of these submissions were mainly concerned with the social and environmental impacts of plantation expansion. Specific issues raised included:

- constraining plantation expansion within an appropriate land use decision framework;
- plantation expansion targets and limits should be identified to plan the future of forest industry sectors, and those industry sectors that are impacted by plantations;
- plantations are being established primarily for solid wood and wood fibre purposes and not high quality sawlogs;
- concern about the quality of sawlogs that eucalypt plantations would provide, and hence the basis of the sustainable yield strategy;
- plantation data need to be improved with figures provided for public and private tenures and establishment regime;
- the projected plantation expansion figures for particular bioregions;
- conversion of native forests to plantations and its impact on biodiversity, integrity of the Comprehensive, Adequate and Representative reserve system, and forest industries based on native forest timbers; and
- impacts on water supplies, landscapes, tourism industry, other agricultural industries and local communities.

5.9.3 Analysis

A major emphasis of the RFA and provision of the Commonwealth funding was to replace the high quality eucalypt and blackwood sawlog resource foregone in the expansion of the Comprehensive, Adequate and Representative reserve system to meet the legislated minimum supply targets. Emphasis was also given to implementing the national plantations *2020 Vision* for expanding the plantation estate on public and private land to facilitate growth in the industry.

Plantation expansion has increased considerably during the first five year period of the RFA which has resulted in both positive and negative economic and social impacts to local communities. The Background Report shows an increase in the plantation estate statewide since 1996 of 55,900 hectares comprising 44,000 hectares of eucalypt plantation (60 per cent increase) and 11,900 hectares of softwood plantations (17 per cent increase). Many submitters did not understand the critical link between Commonwealth funding and plantation development, particularly where this meant clearance of native forest.

At June 2001 Forestry Tasmania had established 16,000 hectares of new plantation of the target 20,000 hectares and undertaken thinning across 4,540 hectares. These new plantations, and thinned native forest, form an integral part of the Forestry Growth Plan and the RFA Employment and Industries Development Strategy.



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Forestry Tasmania advised that all of the plantations established using RFA funding are being managed for sawlog and peeler log production rather than fibre. It is understood that most eucalypt plantations established by the private sector, none of which are funded from RFA programs, are being managed for pulpwood products.

To meet the commitment in Attachment 12.15, a program of fenced blackwood regeneration in 750 hectares has commenced, as has the establishment of 250 hectares of blackwood plantation. The current blackwood programs will be completed by 2005. However, from the Background Report it is unclear what level of enrichment planting has taken place, and whether this is sufficient to meet the 10,000 cubic metre target.

The information contained in the Background Report advises that the Commonwealth has facilitated expansion of private plantations through the Farm Forestry Program.

The Commission considers that the ongoing commitments in Attachments 12.14, 12.15 and 12.16 related to plantations and intensive forest management are being met.

The Commission notes that an overall target for plantation expansion is not provided either in the RFA or Background Report at either a State or bioregion level, or for public lands, or a combination of public and private lands. Equally the Commission considers such a target and limits (expressed in terms of the State and bioregions) would not be useful.

In submissions on the Background Report, Draft Recommendations Report and at the hearings, the issue of land use controls and broad scale plantation development was raised by a number of submitters. Concern was expressed about the lack of control, the lack of a State plan and uncertainty about future plantation development. The Commission notes that under the current policy and regulatory regime in the State there are a number of links between community aspirations, land use planning and sustainable land use. These are the appropriate vehicles to address the balance between plantation development and other land uses, including tourism, other forest based industries, conservation and local community values. These links include:

- Resource Management and Planning System – local planning authorities have the ability to prohibit forestry activities on private land, which has an impact on the Forest Practices Board's approval of Private Timber Reserves;
- Water Management Planning – the development of water management plans under the *Water Management Act 1999* (Tas) provides for community input into water extraction and water quality and associated management issues;
- Natural Resource Management Framework – the *Natural Resource Management Act 2002* (Tas) provides for the establishment of regional committees for natural resource management, which will allow for community involvement in the development of regional natural resource management strategies that bring together native vegetation retention, water management, biodiversity, and threatened species protection;
- Forest Practices System – provides for the consideration of water protection, threatened species, landscape amenity and maintaining a permanent forest estate (see section 4.12); and
- *State Policy on the Protection of Agricultural Land 2000* (Tas) – provides that tree plantations fall within the definition of agricultural activity.



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It is the clear intention of both Parties, as expressed in Clause 102 (i) and Attachment 12 of the RFA, to promote and facilitate the expansion of the plantation estate to provide important economic and social benefits. Plantations, in that tree cover is retained in the landscape, have environmental benefits compared with some alternative land uses that remove tree cover. The State, through the *State Policy on the Protection of Agricultural Land 2000* (Tas), has a firm policy that tree plantations are an agricultural crop, and should be treated no differently from other agricultural crops. Accordingly, landowners are free to choose what they plant, and where, on their land provided they comply with the relevant regulatory provisions that apply. Singling out plantations for special treatment by controlling the size of the plantation estate would have significant implications for confidence and investment in this and other primary industries.

Although the clearance of native forest for plantations is consistent with the National Forest Policy Statement and the RFA, it is an issue that continues to attract wide community comment and concern. Issues concerning the clearing of native forest for plantations are discussed under section 4.12.

The Commission notes the importance of the plantation growers' initiative – the *Good Neighbour Charter* – for facilitating communication between plantation growers and their immediate neighbours about a wide range of social and environmental issues.

An important development in improving the context of new plantation establishment in the broader rural landscape, and integration with catchment management, vegetation retention goals, and local economic and social aspirations, is the development of the Tasmanian Natural Resource Management Framework (see section 4.15).

5.10 Promotion and certification of forest sustainability

5.10.1 Background

Attachment 12.21 commits the Commonwealth to advocating the use of wood sourced from RFA regions as being sustainably managed. Attachment 12.22 commits the Parties to promote and market the sustainability of Tasmanian products in domestic and international markets.

5.10.2 Issues

Several submissions on the Background Report and made at hearings, made comment on certification issues. These include:

- concern at the lack of progress on the promotion of Tasmanian wood products given that only a *Statement on Sustainable Forest Management in Tasmania* (1999) had been made with little active promotion by Parties domestically and internationally;
- some potential international markets appear to be viewing current Tasmanian practice, particularly clearfelling, as not representing sustainable forest management, and as a result access to markets domestically and internationally are potentially at risk; and
- Tasmania should be pursuing Forest Stewardship Council certification, as the Australian Forestry Standard is inferior.



5.10.3 Analysis

One way the Parties are marketing sustainability of wood from RFA regions is through promoting the development of a certification scheme for Australian wood that reflects the outcomes of the RFA. The Background Report describes that the Commonwealth and State are participating in the development and dissemination of information on the Australian Forestry Standard, and other certification and labelling schemes. Additionally the State is running programs promoting whole-of-chain (forest to timber products) education and interpretation.

During 1999 the Australian Government initiated international discussions to explore opportunities of international co-operation on forest management certification, and the labelling of products from certified forests. Consequently, the Australian Forest Standard has been developed as an industry initiative supported by governments, growers and unions, to become a national forest certification scheme. Development and approval of this Standard is now complete.

Two internationally recognised schemes are the Pan-European Forest Certification scheme and the Forest Stewardship Council. These international certification schemes are recognised in European markets where product certification is becoming increasingly required to ensure market access. Similar trends are appearing in the North American and Japanese markets.

The Pan-European Forest Certification scheme offers recognition of national and regional forest certification schemes that meet their criteria, while the Forest Stewardship Council offers recognition of forest standards that meet their requirements as a basis for certification through Forest Stewardship Council accredited certifiers. The accreditation relationship between these international schemes and the Australian Forest Standard is currently unknown.

Submitters reported that cases were beginning to emerge where markets were becoming inaccessible because the particular product did not have a recognised certification label. The export market in high quality wooden furniture was given as an example of a market where only certified products would have market access into Europe and potentially North America. At the hearings the Commission asked for evidence or examples, however the Commission was provided with no evidence other than the assertion.

Wooden boat building was another potential high quality export market where it was claimed certification may be required. The Commission heard that market access into Europe would be unlimited if product certification could be obtained particularly under the Forest Stewardship Council. The products most likely to gain from certification are specialty timber products.

The Commission notes that the Australian Forestry Standard Steering Committee is progressing the mutual recognition and acceptance of the Australian Forest Standard under international certification schemes. This will assist industry in developing export markets for Australian wood products. The Commission encourages the Parties to provide continuing support for the rapid deployment and promotion of the Australian Forestry Standard to facilitate the commitments made in Attachment 12.21 and 12.22.



5.11 Summary

The Commission considers that progress has been made on issues derived from Clause 74 and Attachment 12. However, the Commission also recognises that progress has been difficult to measure and assess. This difficulty occurs for two reasons. Firstly, the intent of the Parties is not clearly established in tangible action related commitments, and secondly the benchmarks and supporting data are just not available.

The Commission considers the industry development component of the RFA, the Comprehensive, Adequate and Representative reserves system, and Ecologically Sustainable Forest Management as all being equally important. This equality is not reflected in the information and data, nor is it reflected in the detail associated with implementation approaches. This should be remedied.

An industry development strategy that clarifies the intent of Attachment 12 and provides an industry vision and action plan to achieve it is a critical first step. The Commission considers this should be the responsibility of the Parties but recognises that industry policy at this level is primarily a role for the State. The Commonwealth has a major role to play beyond the funding role. Such an industry development strategy needs to be developed in the context of the current industry structure, its market and community aspirations, and the requirement to build on existing and potential research and development needs.

The Commission received many submissions on the Background Report, the Draft Recommendations Report and made at the hearings, that raised issues to be considered in an industry development strategy. Some of these are covered in specific Recommendations elsewhere in this report (tourism and apiculture in chapter 7, and special species timbers in chapter 6). However, the industry development aspects need to be better integrated. Issues specifically related to forest industry development are highlighted in Table 5.1. These issues are identified generically and some aspects are suggested for further consideration. The Parties need to recognise there are specific problems or issues behind those identified and develop strategies accordingly.

The Commission received a submission in response to the Draft Recommendations Report advocating that the industry development strategy, proposed in Recommendation 5.2, should be prepared in consultation with the Forests and Forest Industry Council. A further submission advocated that the task be delegated to the Forests and Forest Industry Council. This submission also advocated the provision of additional funds to the Forest Education Foundation to enhance the effectiveness of their current role.

The Commission also considers that the social and economic data and indicators referred to in Recommendation 5.1 need to be developed alongside the industry development strategy so that by the next five yearly review there is sufficient information to make useful comment on progress.



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Recommendation 5.2

That the Parties clarify the intent of Attachment 12 by 30 June 2003 and that the State prepares an industry development strategy, in consultation with the Commonwealth and the Forests and Forest Industry Council, by 30 June 2004, based on that intent and providing an industry vision and an action plan to achieve it. Table 5.1 provides an incomplete list of issues that should be covered by the industry development plan.

Table 5.1 Issues to be considered to clarify the intent of Attachment 12

Issue	Aspects for consideration of further action
Increased domestic downstream processing	Introduction of the Log Supply Charter, improved training and accreditation throughout the production chain, assistance to smaller sectors including special species and furniture industries, Commonwealth assistance to industry development including continuation of Forest Industry Client Manager position, Forest Industry Structural Adjustment Package funding.
Industry information	Improve information about the industry and its regional impact, improve social and economic indicator data.
Public education	Improve public information about the RFA, industry value, sustainability of forest management and wood.
Market information	Provide of up to date market information for the industry including supply and demand information from both public and private forests.
Industry training	Accreditation and training to support Log Supply Charter.
Research and development	Using existing and new research and development opportunities to prepare for the future changes in resource.
Forest and product certification	Support for development and implementation of certification schemes and facilitation of international recognition of the Australian Forestry Standard.



6. *Wood resource security*

6.1 **Sawlog sustainable yield**

6.1.1 **Background**

Clauses 75-77 of the RFA confirm the target level for supplying eucalypt sawlog, veneer logs, and special species timbers from public forests. The RFA supports the Tasmanian Forests and Forest Industry Strategy's sustainable minimum supply target of 300,000 cubic metres per year of high quality eucalypt sawlogs and veneer logs, and 10,000 cubic metres per year of blackwood sawlogs.

These supply levels are subject to periodic five year reviews, which now coincide with the five year review of the RFA. Three associated Clauses that relate to sustainable yield are:

- Clause 66 which provides Commonwealth accreditation of the Tasmanian sustainable yield methodology used to determine sustainable yield based on the 1996 review by Turner and Brack;
- Clause 98 which requires the State to review sustainable high quality sawlog supply levels and report to coincide with the five yearly reviews of the RFA; and
- Attachment 11.2 which commits the State to publishing a description of the methods of calculating sustainable yield including special species timber sawlogs.

6.1.2 **Issues**

The Commission was provided with written submissions on the Background Report and Draft Recommendations Report, and oral submissions at hearings, on a range of topics associated with the subject of sustainable yield, the sustainable yield strategy, review of sustainable yield, sustainable yield of special species timbers and public confidence in the calculation of sustainable yield and the strategy being applied. Subjects raised included:

- issues associated with sustainable yield of timber products, including methodological and sustainable yield strategy and what was meant by ...*the review of high quality sawlog supply levels*;
- the contribution of hardwood plantations to sustainable yield of eucalypt sawlog/veneer log and consequential effect on special species timber yields;
- whether the commitment in Clause 98 for a sustainable yield review extends beyond high quality eucalypt sawlogs to include special species;
- how the intensive forest management initiative is being implemented to realise the outcome for meeting the Forests and Forest Industry Strategy sawlog and veneer log specified targets; and
- how the sustainable yield strategy was associated with the sustainable use of minor timber and non-timber products.

In response to the Draft Recommendations report a number of submissions put forward the view that the present sustainable yield strategy was not effectively using the native forests and did not best meet the needs of current and future generations. Submissions raised concerns about future quality of the timber resources provided to industry stating that sustainable yield reviews should provide practical



data on the quality of the resources to be provided to industry. There was some concern about the significant reduction in sawlog quality as a result of increasing focus on regrowth timbers. Comment was received that greater eucalypt sawlog quality and yield would result if longer rotations (greater than 120 years) were used rather than the current rotation length. One submission commented on the failure of sustainable yield reviews to consider values, benefits and services other than commodity wood production from multiple use forests.

6.1.3 Analysis

Review of sustainable yield

The State completed and published two reports required by Clause 98 of the RFA. These were: *Post-Regional Forest Agreement (RFA) Review of Sustainable High-Quality Eucalypt Sawlog Supply from Tasmanian State Forest*, Forestry Tasmania 1998; and *Sustainable High Quality Eucalypt Sawlog Supply from Tasmanian State Forest Review No. 2*, Forestry Tasmania, May 2002. The State also published the report required by Attachment 11.2.

The term 'sustainable high quality sawlog supply' is not defined in the RFA and as a result is open to interpretation and ambiguity. Several submissions expressed the view that the term, and the commitment, should include special species timbers. Celery top pine, myrtle and blackwood were examples given in submissions or at hearings. Forestry Tasmania's view was the understanding from the RFA was that the commitment applies solely to high quality eucalypt sawlog and veneer log and not to special species timber sawlogs. However, Clauses 76 and 77 would suggest the inclusion of blackwood and the report associated with Attachment 11.2 refers to method of calculating sustainable yield of special species timber sawlogs. Forestry Tasmania advised at the hearings that resource reviews for blackwood and deep red myrtle have also been completed.

It was unclear to the Commission whether the commitment contained in Clause 98 of the RFA was to apply only to high quality eucalypt sawlog and veneer logs, for which the published reviews have done. It notes that the Commonwealth does not appear to have approached the State about this matter. However, the Commission is of the view that the State needs to develop a comprehensive strategy for on going supply of special species timbers from public land, and communicate the contents of the strategy to the users of special species timbers.

Further discussion on resource and yield of special species timbers is provided below.

Criterion 2.1d in the Sustainability Indicators Report provides a discussion of the removal of wood products compared to the sustainable volume. It reports for the period 1996-2001 that two strategies were used for State Forests. The first, (Strategy 1) up to 1997 was based on the changed land base resulting from the RFA and the legislated minimum target of 300,000 cubic metres of high quality eucalypt sawlog. The second (Strategy 2), an accelerated sawlog cut, up to 400,000 cubic metres per year, to support the aims of the Forestry Growth Plan and the RFA for an increase in intensively managed forest to support future value adding and world competitive wood based industries. The Sustainability Indicators Report states that Strategy 2, as well as supporting new market opportunities,



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and improved utilisation standards, would lead to increases in pulpwood yields arising from sawlog harvesting operations in the short term.

The Commission notes from the Sustainability Indicators Report that:

- the actual high quality eucalypt sawlog cut for the five year period was below the target of 300,000 cubic metres per year and averaged 275,000 cubic metres per year;
- since the application of Strategy 2 the sawlog cut has still only averaged 280,000 cubic metres per year;
- the sawlog/pulpwood ratio declined from 17 per cent in 1996-97 to 11 per cent in 2000-01 and averaged 13 per cent during the period; and
- when comparing both strategies, Strategy 2 resulted in a small increase in sawlog production (8 per cent) but a large increase in pulpwood (52 per cent).

These figures and trends have been analysed and explained in the Sustainability Indicators Report. A better explanation of these figures may have addressed some of the concern expressed in submissions that current practice appears to be woodchip driven. At the hearings Forestry Tasmania was asked to comment on sawlog/pulpwood ratios and the quantity of woodchip being exported. An explanation of changing sawlog/pulpwood ratio was that the pulpwood market largely drove the ratio. That is, when pulpwood price was high, lower quality forest was harvested, and when the market price was low, higher quality forests were typically harvested. The increase in woodchip exports was largely attributed to the Commonwealth lifting export ceilings that were in place prior to signing the RFA. This lifting had allowed the commercial sale of felled pulpwood that had previously been left in the forest as waste due to the artificial constraints imposed by the export licence ceilings.

It is the intention of the Parties, expressed through the RFA, to maintain the management of native forest resources in State Forest on a *sustainable high quality sawlog supply* basis. This is supported in the Sustainability Indicators Report as it was stated that pulpwood supply arises from meeting the sawlog commitments with its relationship being tied to the sawlog cut.

Submissions on the Background Report raised issues of confidence in plantation models, and there were concerns about projections of likely sawlog quality associated with regrowth stands. These need to be addressed in time for the next review. The Commission recognises that the system and review of sustainable yield is continuing to improve. The inclusion of independent audit reports in the reviews of yield is helpful in addressing public accountability and transparency issues. These improvements will help maintain and improve public confidence in the data and forest management generally.

The issue of the appropriate strategy to meet current and future needs of industry and society is a matter for the State in consultation with the Commonwealth. Consideration of this matter will be required in the context of continued implementation and development of Ecologically Sustainable Forest Management, balancing the requirements of industry and benefits to society as well as informing implementation of Recommendation 5.2.



Recommendation 6.1

That the State continues to improve transparency in reporting, and continuously improves the methodology as identified in previous sustainable yield reviews, with the aim of increasing public understanding of, and confidence in, the sustainable yield reviews of high quality sawlogs from public lands.

Sustainable yield of special species sawlog

A number of submissions on the Background Report, Draft Recommendations Report and made at hearings, raised issues associated with special species timbers and their sustainable yield and these are further discussed in section 6.2. However, a number of submissions point out concerns about the long term sustainable supplies of special species timbers from public forests. A number of submissions advocated the stopping of clearfelling of old growth forests to help guarantee supplies of these timbers in the long term. Old growth in wet mixed forests was particularly suggested for a clearfelling moratorium until the long term supply yields of specialty timbers are adequately determined for the future of industries associated with special species timbers.

Submitters stated their belief that suitable supplies of special species sawlog were fast running out, particularly given an apparent finish of harvesting of the mature eucalypt forest resource by 2050. It appears that, other than for deep red myrtle and blackwood, there has not been any recent reviews of other special species sawlogs such as celery top pine. The Commission considers that the State should periodically review the ongoing supplies of other special species sawlogs in order to provide better public information on long term supplies of these important timbers.

Recommendation 6.2

That the State develops a strategy for ongoing supply of special species timbers from public lands. The State needs to provide information to the market to clarify the future resource.

The Commission notes the difficulty for the State in developing forest management strategies that reconcile industry and community aspirations, economic yields and ecologically sustainable yields. Analysis of the industry issues and their importance is contained in chapter 5 of this report where the need for improved strategies to address these issues is highlighted.



6.2 Special species timbers

6.2.1 Background

The Parties raised issues associated with special species timbers in the period leading up to the RFA. As a result the RFA contains several commitments specifically related to special species management, some of which are discussed elsewhere in this report:

- Clauses 54 and 55 to review the deep red myrtle resource and to include the Savage River Pipeline Corridor in the calculation of sustainable yield of special timbers (see section 3.4);
- Clause 77 acknowledging that the RFA has been designed to provide for the continuing supply of a minimum of 10,000 cubic metres per year of blackwood sawlog (see section 6.1);
- Attachment 10.6 requires the State to further develop and apply flexible silvicultural systems on public land to promote the sustainable production of special timbers particularly in the South and North West of the State;
- Attachments 11.1 and 11.2 requiring the State to prepare and publish reports on silvicultural guidelines for management of forest types, and methods of calculating sustainable yield of special species sawlogs (see section 8.3);
- Attachment 12.15 requiring the Parties to facilitate new special species timbers resources, including blackwood plantations and fenced regeneration (see section 5.9);
- Attachment 12.27 requiring the State to facilitate development of the wood craft industries dependent on special species timbers with a range of actions;
- Attachment 12.28 requiring the Commonwealth to assist the State in maximising recovery of special timbers from harvested forests; and
- Attachment 12.28 committed the Parties to establishing a trading house and permanent storage facility for wooden boat boards to help manage the demand and supply of boards for wooden boat building.

6.2.2 Issues

Special species timber supply was an issue of considerable concern expressed in many submissions on the Background Report, the Draft Recommendations Report and made at the hearings. Statements were made that not enough was being done to support industries dependent upon special species timbers. Significant criticism was made of the Parties' commitment to ensure adequate resources of special species timbers now, in the mid and long term. Concern was associated with debate on native forest conversion to plantations, the practice of clearfelling and logging old growth, forestry practice, industry development opportunities, value adding, certification, product utilisation and specification, waste, Government commitment, sustainable yield, silvicultural practice and sustainability indicators.

Specific issues raised in submissions concerning special timbers management and future supply were:

- Special Timber Management Units in southern Tasmania were inadequate;
- the capacity of the Special Timber Management Units to provide adequate future resources for the needs of the industry dependent on these resources;



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- the rationale for having harvesting rotations of 90 years for forests containing special timbers outside of Special Timber Management Units;
- the need to manage areas of wet eucalypt forest on long rotations (greater than 120 years) to provide supplies of special timbers of specific quality and size requirements for specialised uses (eg boat building);
- questioning clearfelling as being the only effective way to safely log and regenerate wet eucalypt forests;
- current clearfall and burn practice was wasteful of special species timbers squandering future opportunities for their dependent industries;
- the commitment in Attachment 12.27 to assess additional areas for long term special species production was not confined solely to Special Timber Management Units, but was to be used for developing the special species timber resource base for current and future generations;
- concern that Forestry Tasmania's trials of alternatives to clearfelling of old growth forests were under funded, repeatedly delayed and current trials are at a stalemate; and
- delays associated with the wooden boat board bank initiative in Attachment 12.28.

6.2.3 Analysis

The relationship of special species timbers, product utilisation, waste and future resource supply to the industries using these timbers (sawmillers, furniture, craftwood, boat building) is discussed here. Other sections of this report also deal with issues associated with special species timbers – industry development (section 5.8), sawlog sustainable yield (section 6.1) and plantations (section 5.9).

Commitments outlined in Attachment 12.27 and under the carriage of Tasmania appear to be proceeding satisfactorily. The Background Report identifies progress being made on a range of initiatives. Additional Special Timber Management Units have been set aside in all regions of the State, but primarily in the North West region, for long term management and supply of special species timbers, addressing one of the commitments in Attachment 12.27. Wood production zones outside Special Timber Management Units are managed primarily for sustainable supply of high quality eucalypt. These zones and units are identified and regularly reviewed by Forestry Tasmania through Forest Management Plans.

The Commonwealth provided RFA funding to Tasmania to employ a special species officer to work with industry on maximising recovery of special species timbers, meeting the commitments in Attachment 12.28.

RFA funding under Clause 101(ii) of \$0.2 million was allocated to the Tasmanian Forests and Forest Industry Council to develop and manage the establishment of a trading house and permanent storage for wooden boat boards. The Tasmanian Forests and Forest Industry Council advised the Commission that the wooden boat board bank had commenced but is yet to trade commercially and therefore its effectiveness cannot be determined.

The commitment in Attachment 10.6 has been progressed through on-going research and development of silvicultural systems for special species timber management. Further research on



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alternative silvicultural systems has taken place in the Warra Long Term Ecological Research Site, which will be fully evaluated by 2005 and may be applied after this date. Research reports have been published, and a technical bulletin on rainforest silviculture has been produced for rainforest areas identified for special species timber production, which contributed to meeting the commitment at Attachment 11.1.

However, based on submissions, the Commission suggests that more needs to be done by the Parties to address the future resource needs of this sector (Recommendation 6.2).

Brueckner-Leech (1999) identified that major contributing factors to wasted special species timber resources were poor planning, management and co-ordination, between logging and recovery operators, resulting in limited and poor access to coupes and lack of specification and identification of grades of special species timbers. Submissions to this review were critical about the level of utilisation and the problems with product specification in regard to both special species timbers and eucalypts.

Submissions suggested the long term certainty of an adequate resource of specialty timbers needed to be provided given the lack of evidence of the long term future of these resources and the findings of the Deep Red Myrtle Resource Review report. Many submitters believed that suitable resources of special species timbers would run out during the period of the RFA given current strategy and practice, and lack of sustainable yield information.

The Commission has made Recommendation 6.2 above to address the need for better public information on the resource and a management strategy, for the long term supply of special species timbers from public lands. However, the Commission notes that the wood users also have a role to play. Much of the suggested under utilisation occurs because wood users are not prepared to pay the market price. This suggests that the industry and the resource managers need to work together.



7. *Other forest uses*

7.1 *Mining and mineral exploration*

7.1.1 *Background*

The RFA makes provision for the security of access to the mining industry by providing defined Comprehensive, Adequate and Representative reserve system land tenures as outlined in Attachment 6. These land tenures allow for exploration and mining together with the protection of environment and heritage values. Clauses 78 to 82 deal primarily with mining and mineral exploration processes and the extent to which these activities may be carried out within the Comprehensive, Adequate and Representative reserve system.

Clause 74 of the RFA and Attachments 12.25 and 12.26 specify actions by the Parties to facilitate mineral industry development.

7.1.2 *Issues*

Very few substantive comments were made in submissions on the Background Report on progress towards the commitments contained in Clauses 78 to 82 or Attachments 12.25 and 12.26 of the RFA. A few comments were made generally expressing opposition to mining and mineral exploration in the reserve system, particularly those with wilderness values.

7.1.3 *Analysis*

There have been no mining activities conducted or proposed in the Comprehensive, Adequate and Representative reserve system during the course of this five year review period. All proposals for mineral exploration in Comprehensive, Adequate and Representative reserves have been subject to the Tasmanian Mineral Exploration Code of Practice, and the Mineral Exploration Working Group has functioned as required under the RFA. The Commission is satisfied that the State has delivered on RFA commitments relating to mining and mineral exploration as detailed in Clauses 78 to 82.

Access to reserved land by the minerals industry continues to accord with the relevant State legislation and RFA provisions. No submissions reported concerns to indicate otherwise.

The Background Report provides details on the actions of the Parties towards meeting the commitments in Attachments 12.25 and 12.26. A Commonwealth/State project to enhance the quality of geo-scientific data is scheduled to be completed in 2003. This should allow the mineral industry to further streamline its processes for targeting areas for exploration.



7.2 Tourism and recreation

7.2.1 Background

The RFA, through Clause 74 and specific actions in Attachments 12.10-12.13, provides for the development of tourism and recreational opportunities based on Tasmania's environmental advantages. The Sustainability Indicators Report (Criterion 6.2) provides figures for activities and visits to recreational sites. Tasman, Freycinet, Cradle Mountain and Mt Field are the principal National Parks visited with the Tahune AirWalk the principal Forest Reserve now visited by tourists. Visitor numbers to the Tahune AirWalk were not included in the Sustainability Indicators Report due to the AirWalk not opening until July 2001. Generally visitor numbers have remained steady or increased during the five year period of the RFA. Numbers for the Tahune AirWalk may indicate an increase overall due to its obvious success.

The commitment in Attachment 10.7 of the RFA to develop a nature based tourism and recreation policy is discussed in section 4.17 of this report.

7.2.2 Issues

Many submissions on the Background Report, Draft Recommendations Report and made in hearings, referred to the tourism industry and its interaction with forestry. Issues raised included:

- not enough is being done through the RFA for tourism;
- the RFA should provide a balance between the forestry industry and the forest based tourism industries;
- the lack of a statewide policy on nature based tourism and recreation caused a significant gap in support of nature based tourism and recreation across land tenures;
- the potential development of tourism and recreational opportunities based on Tasmania's environmental advantage and assets;
- the current forest management strategy was seen as impacting on the Tasmanian tourism brand, and that Tasmanian tourism's 'clean green' image should be promoted;
- forestry practice can, and does, conflict with tourism and recreational opportunities. In particular, wilderness scenery and landscape value for tourism were being ignored in forest planning;
- current management planning is not balancing forestry, logging and tourism assets. Tasmania is being dramatically modified at an alarming rate, without meaningful consultation or consideration of the long term impacts forestry and logging have on the tourism industry in Tasmania;
- the future potential of tourism is undervalued – the return to Tasmania from tourism will be substantial in the long term;
- a tourism strategy is required;
- potential sites for tourism were raised like the Valley of the Giants (Beech Creek), which was set aside in the RFA for old growth tourist value but has since been ignored by the tourism industry;
- the need for forest based tourism jobs to be reported in one of the sustainability indicators; and
- the lack of funding for tourism in National Parks and other reserves.



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The Commission received a submission on the Draft Recommendations Report that suggested that the tourism industry develop attractions within the reserve system and not depend upon access to multiple use forest, and that the Tahune AirWalk was an example of how very successful tourism operations occurred in working forests.

7.2.3 Analysis

Most of the issues raised in submissions were outside the Commission's Terms of Reference, which are to review the specific commitments and timelines contained in the RFA.

The State and Commonwealth have provided substantial funding to develop tourism facilities including interpretation centres, visitor centres, upgrading walks, supporting local tourism ventures, eco-centres and the Tahune AirWalk. The provision of RFA funds and their allocation to developing particular tourism facilities is reported in the Background Report. The State has allocated \$8 million during 2000-04 for maintaining basic visitor infrastructure in reserves administered by the Department of Primary Industries, Water and Environment.

Forestry Tasmania is developing a tourism strategy for State Forests with an aim to promote regional development, employment and rural community benefit. The Commission notes that a comprehensive State tourism strategy, Tourism 21, provides a framework for tourism development across the State. Tourism 21 was developed by Government Agencies with tourism industry input.

The Background Report outlines work undertaken in developing applications for tourism development grants, performing surveys of tourist activities, provision of tourism signage, and undertaking research into sustainable tourism. The Tourism Development Steering Committee, as reported in the Background Report, is prioritising tourism development and developing policies and plans to facilitate sustainable tourism.

These tourism strategies provide for the development of the tourism industry across all land tenures, and the Commission considers this appropriate.

The Commission received significant representation on the importance of forests for the tourism industry. The statewide policy on nature based tourism and recreation management required under Attachment 10.7 (see section 4.17) should address most of the issues raised in submissions. This statewide policy should help promote the development of sustainable forest based tourism. Co-ordinated industry development will be helped through implementation of a statewide policy on nature based tourism and recreation management, as well as having appropriate linkages to Tourism 21. These initiatives will help to promote and provide for the potential development of tourism and recreational opportunities based on Tasmania's environmental advantage and assets associated with forests.

The commitment in Attachment 10.7 of the RFA for the State to finalise its nature based tourism and recreational management policy has not been met. The Commission considers that the State needs to expedite its completion.



Recommendation 7.1

That the State finalises its nature based tourism and recreational management policy by 31 March 2003.

7.3 Apiculture

7.3.1 Background

Clause 29 of Attachment 12 requires the completion of implementation of a protocol for leatherwood honey management on all public land tenures throughout the State. The protocol was previously agreed between the Tasmanian Beekeepers Association, Forestry Tasmania and the (now) Department of Primary Industries, Water and Environment.

Leatherwood is an important apiary resource for two reasons. It provides regular supply of high quality honey, and secondly it provides the energy supplies for wintering bees to maintain suitable condition for provision of pollination services to Tasmanian horticultural industries. The Background Report provides production statistics of beeswax and honey production. Leatherwood represents 70 per cent of the honey production. The Background Report mentions that leatherwood rich forest resource has been lost with no loss in apiary sites, or loss in honey and wax production.

7.3.2 Issues

A submitter in a submission on the Background Report, Draft Recommendations Report and made at hearings provided comment and claimed that the Community Forest Agreement between Forestry Tasmania and the Tasmanian Beekeepers Association was not adequately fulfilling the requirements of a protocol for leatherwood honey management. The submission reported that the situation was particularly critical to southern Tasmanian beekeeping and horticultural industries, where a pollination service crisis with associated significant impact to agricultural and horticultural industries was becoming apparent. A substantial amount of supplementary material was provided to the Commission in hearings. The submitter claimed that a significant amount of the pre-existing leatherwood resource in the southern forest had disappeared since the RFA was signed, and that much of what remained outside of the Special Timber Management Units was to be logged in the next three years.

Representation was made that 70 per cent of the apiary resource for the industry was based on leatherwood in State Forest and conservation reserves.

A number of submissions were received in support of the recommendations in relation to accessing leatherwood resource in the Draft Recommendations Report. One submission went further by suggesting that access to leatherwood in reserves should be a key priority of any policy on honey production. Another submission stated that the proposition to access leatherwood from reserves was an attempt to shift responsibility for the mismanagement of State Forests to other land managers.



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Further, this submission suggested that there should be an immediate moratorium on clearfelling coupes containing leatherwood while a new protocol is developed.

Further submissions were received in the hearings from the Forests and Forest Industries Council and the Tasmanian Beekeepers Association that addressed the need for further engagement of the apiculture industry in forest management planning towards ensuring long term access to the leatherwood resource. Both submissions were aimed at furthering the multiple use objective of the *Forestry Act 1920* (Tas). The Tasmanian Beekeepers Association stressed the need to change the current forest management practices in order to maintain sufficient leatherwood resource to sustain a viable apiculture industry. Their submission also included information on the value of the horticultural sector depending on the pollination services and form letters from cherry growers.

7.3.3 Analysis

The benefit from pollination services to the horticultural industry is estimated at \$111 million annually (Tasmanian Rural and Fishing Industry Profiles, DPIWE 1999). Principal crops include pome and stone fruits, cabbage, carrots, cauliflower, cherries, clover, fennel, onions and berry fruits. The horticultural industry is increasing its reliance on pollination services because of the significance in the benefits attributed to controlled pollination provided through apiary services. Because of the projected expansion of Tasmanian horticultural industries the demand in pollination services is expected to increase.

Ziegler (1993) reported that of the accessible leatherwood resource at that time, 70 per cent was found on State Forest and 30 per cent in World Heritage, other reserves, Crown Land and Hydro-Electric Corporation land. The Commission notes that further accessible leatherwood resource is likely to have been reserved as a result of the RFA. Very little suitable leatherwood resource was on private property. The current amount of accessible leatherwood rich native forest nectar resource appears poorly known, but is understood to have declined since the Ziegler study and others used to develop the RFA (Dann et al. 1997).

The RFA commitment in Attachment 12.29 was for completing the implementation of the protocol for leatherwood honey management on public land as agreed. Forestry Tasmania provided evidence at a hearing that the protocol had been implemented and that Forestry Tasmania and the Tasmanian Beekeepers Association had signed a Community Forest Agreement. Forestry Tasmania maintains a close and co-operative relationship with the Tasmanian Beekeepers Association and regular meetings are held to discuss and resolve any issues concerning the implementation of the protocol. It was the view of Forestry Tasmania that the opinions expressed in the submission were not in accord with the views of the Tasmanian Beekeepers Association. The Commission notes that the views now being expressed are those of the Tasmanian Beekeepers Association.

The Commission notes that there are differences in view about the issues of leatherwood harvesting and the effectiveness of the existing protocol. The submitter made clear the view that the protocol was inadequate. However, the economic structure of the industry, including the value of pollination services to the horticultural industry, is not well understood. The opportunity costs of managing forests with a priority for leatherwood, as opposed to wood production, are also not well understood.



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Getting the balance right is clearly in Tasmania's interest. The Commission recognises that secure access to public land is required by the apiary industry, with resource security of floral stocks. Management of leatherwood and appropriate apiary security needs to be incorporated into management plans for forest and conservation lands. Pollination services also need to be recognised as an important commercial activity. This requires the economic linkage between the nectar floral resource (primarily forest based) and the horticultural industry via apiary to be well understood. It could be useful for the Horticulture Research and Development Corporation and/or Rural Industries Research and Development Corporation to study the value and interdependencies of apiary and horticulture industries to the leatherwood resource.

Such information would help to determine the management of leatherwood resources. It would also assist in structuring the commercial basis for the apiculture industry. Irrespective of this information, comprehensive management plans and silvicultural strategies to provide for accessible leatherwood rich resources now, and in the long term, need to be developed and implemented. Resource certainty and security of access to leatherwood for the apiary and the horticultural industries is required, but needs to be considered across all public lands, and within the context of the resource security needs of other forest users, including the wood products industry.

Recent developments in the industry, including the formation of a Forest Policy Committee of the Tasmanian Beekeepers Association and the recent involvement of the Forests and Forest Industry Council, have been positive. The Commission considers, however, that more immediate attention needs to be given to the leatherwood resource issues in the southern forests. The apiary industry needs to recognise the solutions will need to come within a commercial framework for the forest industries, the pollination services sector and the beekeepers themselves. Continuation of the view that the problems can only be solved by others is unlikely to lead to a satisfactory resolution. The apiary industry needs to recognise that there will be opportunity costs associated with the solution.

Recommendation 7.2

That the State continues to work with the apiary industry to resolve the issues on public land for bee keeping and the leatherwood resource. That the State and the Tasmanian Beekeepers Association jointly prepare a plan for management of the leatherwood resource in the southern forests by 30 June 2003.

7.4 Indigenous use

7.4.1 Background

Under Clause 83 and Attachment 10.5 of the RFA, Tasmania undertook to introduce into State Parliament, following consultation with the Tasmanian Aboriginal community, legislation to replace the *Aboriginal Relics Act 1975* (Tas). The review of the Act was intended to provide an improved legislative basis for management of Aboriginal heritage values in Tasmania. Consultation with the



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Tasmanian Aboriginal community was to ensure management of Aboriginal heritage, including maintenance of traditional and historic sites, uses and values in Tasmania was appropriate.

7.4.2 Issues

No comment on these commitments was made in submissions to the Review.

The Background Report indicates that work on the commitment by Tasmania to introduce legislation to replace the *Aboriginal Relics Act 1975* (Tas) was commenced but has not been completed. Further work on this commitment is awaiting the review and passing of Commonwealth legislation to revise the *Aboriginal and Torres Strait Islander Heritage Protection Act 1975* (Cth) and further consultation with the indigenous community.

7.4.3 Analysis

The Commission is aware of the sensitive and complex nature of discussions surrounding the review of this legislation. It considers that it is not reasonable to impose a timeframe on the development of new legislation in this case, although it is desirable that it remains on the State Government's legislative agenda.



8. *Process issues*

8.1 *National Competition Policy*

8.1.1 *Background*

Under Clause 87 of the RFA, Tasmania undertook to review legislation relevant to the pricing and allocation of hardwood logs from State Forest by 31 December 1999, taking into account competitive neutrality principles.

Clause 99 of the RFA outlines Tasmania's agreement to undertake a review on pricing and allocation policies for the commercial Government owned forestry operations (Forestry Tasmania), and publish a report on the outcomes of the review. It was agreed that the outcomes of the review would be considered during the development of Forestry Tasmania's pricing and allocation policy.

8.1.2 *Issues*

A submission on the Background Report asserted that the RFA funding package, legislative arrangements and business practices of Forestry Tasmania are in breach of the National Competition Policy. There is reference to the concentration of ownership of the forest industry and to a current review of the Australian forest industry by the National Competition Council.

It was also asserted that the operations of Forestry Tasmania, and the funding package provided by the RFA are in breach of the National Competition Policy.

A number of submissions expressed the belief that forest products produced by Forestry Tasmania, particularly pulpwood logs, were sold for too low a price.

The Commission received a submission on the Draft Recommendations Report that it should have taken note of the submitter's earlier submission on the intention of the National Competition Council to undertake a review of the Australian forest industry.

8.1.3 *Analysis*

The *Forestry Act 1920* (Tas) was amended in 1999 to comply with National Competition Policy by removing all provisions that were anti-competitive in nature. The amendments came into effect on the 1 January 2000.

The Commission considers that the issues raised about the RFA funding package, or the operations of Forestry Tasmania being at odds with the National Competition Policy, are not relevant to the Terms of Reference of this review.

The RFA commitment to undertake and publish a review of pricing and allocation policies for Forestry Tasmania's operations, and consider the outcomes of the review has been met. A review was published by Margules Poyry/Access Economics (1998). Comments on the price received by Forestry Tasmania



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for its products are outside the scope of this review and are a commercial matter for Forestry Tasmania to address.

The Commission notes that the National Competition Council is undertaking a review of the progress of implementation of National Competition Policy and related reforms in the forest and fisheries industries by all governments. However, this Commission is charged with ascertaining whether the commitments contained in Clauses 87 and 99 of the RFA about National Competition Policy reforms have been undertaken. The Commission finds that the commitments under Clauses 87 and 99 have been met.

8.2 Land use planning

8.2.1 Background

Forestry land use planning on private land is covered by the *Forest Practices Act 1985* (Tas) except to the extent that it is limited, or constrained by, municipal planning schemes under the *Land Use Planning and Approvals Act 1993* (Tas). The *Forest Practices Act 1985* (Tas) also makes provision for Private Timber Reserves that provide opportunity to reserve private land for forestry purposes. The effect of Private Timber Reserves is to exempt forestry operations within them from the provisions of local government planning schemes.

8.2.2 Issues

The Commission received several representations on the Background Report and at hearings expressing the view that the forest industry should be subject to the Resource Management and Planning System, and the appeal processes under the Resource Management and Planning Appeals Tribunal.

The Commission received a submission in response to the Draft Recommendations Report questioning the different planning requirements for tourism developments and forestry operations. Another submission advocated increased cooperation between forest and tourism industries to ensure better and more sympathetic planning of activities.

A further submission claimed that the lack of integration between the Forest Practices System and the Resource Management and Planning System hinders the implementation of Ecologically Sustainable Forest Management, and is in conflict with the terms and objectives of the RFA.

8.2.3 Analysis

The current system of land use planning for the forest industry, including the Forest Practices System and the Resource Management and Planning System, was part of the Forest Management System accredited under the RFA. All forestry operations are required to be planned and approved under the Forest Practices System. Operations on private land outside of Private Timber Reserves are also

required to comply with the requirements of the Resource Management and Planning System. The RFA contains no commitments that change this relationship between the two complementary planning systems. The Commission notes that, as recently as last year, the Tasmanian Parliament reaffirmed its view about the appropriate structure for land use planning for the forestry industry when it passed legislation amending the *Forest Practices Act 1985* (Tas). The changes to the planning system proposed by submitters are clearly beyond the Terms of Reference of this review.

8.3 Consultative mechanisms

8.3.1 Background

The Parties agreed under Clauses 72 and 73 of the RFA to continue, or implement, a range of public reporting and consultation mechanisms as detailed in Attachment 11 of the RFA.

These included a range of pre-existing commitments on:

- forest management plans;
- annual three year wood production plans;
- lists, strategies and plans under the *Threatened Species Protection Act 1975* (Tas);
- the Historic Cultural Heritage Register;
- the Forest Practices Code;
- reserve management plans under the *National Parks and Wildlife Act 1970* (Tas);
- reserve management plans under the *Crown Lands Act 1976* (Tas);
- lists and plans under the *Endangered Species Protection Act 1992* (Cth) (now replaced by the *Environment Protection and Biodiversity Conservation Act 1999* (Cth));
- listings on the Register of the National Estate;
- Annual Reports;
- State of the Environment, and State of the Forest Reports; and
- consultation with the Aboriginal community in relation to Aboriginal cultural heritage information.

Further, Tasmania committed to prepare and make publicly available reports on:

- silvicultural guidelines for management of commercial forests by 31 December 1998;
- methods for calculating sustained yield from public land by 31 October 1998;
- annual compliance audits for codes of practice and monitoring of regeneration;
- a description of the Management Decision Classification System by 30 April 1998; and
- a revised manual for the Management Decision Classification System including prescription guidelines for special management zones by 31 March 1999.



8.3.2 Issues

A submission on the Background Report and reiterated at the hearings provided an account of the failure of the public consultation processes for the preparation of a Forest Management Plan and a former inquiry into regeneration burning.

A few submissions on the Background Report expressed general dissatisfaction with the level of effective consultation with the community on forestry issues, particularly with aspects of the Forest Practices System.

8.3.3 Analysis

All commitments in Clauses 72 and 73 of the RFA, except for the following, have been met in full and, where relevant, accord with the procedures provided in the relevant statutes and on time. The three exceptions are:

- there have been no management plans prepared for Public Reserves on Crown land as greater priority has been accorded to preparing plans for the reserves under the *National Parks and Wildlife Act 1970* (Tas). There has therefore been no need for consultation. The *Crown Lands Act 1976* (Tas) was amended in 1998 to include provisions for public consultation in the process of preparing management plans for public reserves. These provisions came into force on 31 December 2001;
- all commitments for new reports to be prepared by Tasmania have been met, although there were small delays in meeting some target dates; and
- results of annual compliance audits for the Reserve Management Code of Practice have not been published as the Reserve Management Code of Practice is yet to be finalised. It is expected this will be done following the introduction of the Reserve Management Code of Practice, expected in 2003.

Examples were presented in submissions on the Background Report, Draft Recommendations Report and at the hearings of alleged failures of the consultative process. An example given of the failure of the consultation processes for a Forest Management Plan appears to have been a human error, which was subsequently corrected. The Commission does not consider this to have been a failure of the process.

The Background Report details the measures taken to provide for effective public consultation. The Commission notes that there will often be some dissatisfaction with public consultation processes and there will always be room for improvement. The Commission has addressed the need for better communication standards and practices for the Forest Practices System in section 4.2.

The Commission considers that the Parties have fulfilled, with a few minor exceptions, their commitments in Clauses 72 and 73 to provide appropriate consultation mechanisms under the RFA and are continuing to improve them.



8.4 Data use and management

8.4.1 Background

Under Clause 90 of the RFA, the Parties agreed to provide mutual access to, and accreditation for, relevant information owned and held by each of them. Attachment 14 of the RFA sets out the arrangements for data use and access, the ultimate aim being to ensure effective implementation and monitoring of the RFA.

8.4.2 Issues

The public consultation phase produced no substantive comments relating to these commitments.

8.4.3 Analysis

Provisions at Attachment 14 of the RFA relating to data exchange, disposal, listing and archiving required a number of actions to be taken, and for these actions to occur within three months of the commencement of the RFA. According to the Background Report most of these actions were taken within five months of the commencement of the RFA, with a few taking longer. The delay in meeting the commitments has not unduly hampered efforts to implement and monitor the RFA.

The Commission is satisfied that the Parties have complied with the undertakings for data use and access as set out in Clause 90 of the RFA.

8.5 Financial assistance

8.5.1 Background

Under Clauses 100 and 101 of the RFA, the Commonwealth committed to provide a \$90 million for a package of measures comprising:

- implementation of intensive forest management measures (\$57 million);
- employment and industry development initiatives (\$13 million);
- infrastructure projects (\$10 million); and
- Private Forest Reserve Program (\$10 million).

The Commonwealth Government committed to provide a further \$20 million from the Natural Heritage Trust toward the implementation of the 'program to protect conservation values on Private Land in support of the Comprehensive, Adequate and Representative Reserve System.'



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8.5.2 Issues

Two issues were raised in submissions on the Background Report and at the hearings:

- the amount of money allocated to the Private Forest Reserve Program was inadequate to achieve the aims of the program and provide for ongoing stewardship of the Reserves. At the same time, there is a prospect that some of the funds may be returned unspent, due to Commonwealth requirements; and
- the Commonwealth Government committed substantial funds to provide for the restructuring of the Tasmanian wood products industry when the industry obtained additional resource, rather than lost resource, out of the RFA.

8.5.3 Analysis

Of the issues raised in submissions, the second issue is outside the Terms of Reference of the review. The Commonwealth's financial commitments have been fulfilled on time, although there remains an outstanding obligation for the remainder of the \$20 million allocated from the Natural Heritage Trust for the Private Forest Reserve Program.

By October 2001 approximately \$5.3 million had been provided from the Natural Heritage Trust to establish the Private Forest Reserve Program. Provision of these funds is on a case-by-case basis requiring the approval of the Commonwealth Minister for the Environment. This issue is further discussed in sections 3.1.4 and 3.1.5 of this report.

8.6 Tasmania Together

8.6.1 Background

Tasmania Together is a Government led, community driven plan for the State. It provides a long term vision for Tasmania and a set of benchmarks against which social, economic and environmental progress is to be measured over a twenty year time frame.

In May 1999 the Community Leaders Group was established to guide the preparation of the Plan. In September 2001 *Tasmania Together* was released. The Parliament passed the *Tasmania Together Progress Board Act 2001* (Tas) in June 2001 to establish the *Tasmania Together* Progress Board. The Board's role is to review and monitor progress toward achieving the benchmarks and report to Parliament on that progress.

A number of the benchmarks relate directly to the forest industry and the industry has a significant contribution to make to the outcomes associated with a number of others. Benchmarks of direct relevance to the forest industry include among others:

- goal 24.1 To limit conversion of land with native vegetation;
- goal 24.2 To sustainably manage old-growth forests and to phase out clearfelling in these forests;



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- goal 24.5 [To] reduce reliance on chemical use by primary, secondary and tertiary industry and the domestic sector; and
- goal 24.6 To mitigate the effects of greenhouse gases and ozone-depleting substances and where possible reduce emissions.

8.6.2 Issues

The Commission received submissions on Tasmania *Together* advocating that the Commission:

- take account of the Tasmania *Together* benchmarks;
- recommend the cessation of old growth forests by the year 2003;
- recommend that use of 1080 cease based on the intent of the Tasmania *Together* benchmark; and
- recommend against the proposed wood fired power station because of the impact on the Tasmania *Together* climate change benchmark.

The Commission received a number of submissions on the Background Report, Draft Recommendations Report and at the hearings, stating that the RFA was at odds with the Tasmania *Together* process. Other submissions stated that the Review should disregard the Tasmania *Together* benchmarks.

The Commission sought information from the Director of the Tasmania *Together* Progress Board on the process being adopted by the Progress Board in fulfilling their responsibilities and in particular on the old growth forest benchmark. The Commission was advised, at the hearing, that the Progress Board was considering a request from Government to review the old growth benchmark.

The Commission has been advised by the Department of Premier and Cabinet (2002) that the Tasmania *Together* Progress Board has responded to the Tasmanian Government's request. The Department has advised that the Tasmania *Together* Progress Board does not propose to amend the 1 January 2003 benchmark, to end clearfelling of old growth forests of high conservation value, as it does not want to heighten community division over the issue. The Progress Board considered that this benchmark was 'aspirational rather than technical' and recognised that it will not be met. The Tasmanian Government's view is that the benchmark can not be met without jeopardising employment in the sawlog and veneer industries. The Tasmanian Government's view is that it will not pursue a policy that jeopardises further jobs in the forestry industry.

The Tasmania *Together* Progress Board has provided the Commission with a copy of a press release in which, in addition to the above information, it advises of its intention to focus on the 2010 benchmark. The benchmark is to phase out all clearfelling of old growth forest by 2010 and the Tasmania *Together* Progress Board intends to work with Government and the forest industry to develop some interim targets.



8.6.3 Analysis

The RFA predated the establishment of Tasmania *Together*. Therefore there are no milestones and commitments in the RFA in relation to Tasmania *Together*. Tasmania *Together* is a high level twenty year plan for Tasmanians and the benchmarks are intended as indicators of progress towards the Tasmania *Together* vision. They are not statements of Government policy or of RFA commitments.

The Commission notes that the implementation of the Tasmania *Together* benchmarks is not required by the RFA. The Commission has reviewed the submissions and information provided to it about this matter and considers that the relationship of the benchmarks to the RFA is not an issue for this Review.

8.7 Request for Royal Commission into Tasmania's forestry sector

8.7.1 Issue

The Commission received submissions on the Background Report alleging that sections of the forest industry were corrupt and dishonest. At the hearings, the submitters elaborated on the allegations. Some submitters called for a broader inquiry to help resolve community differences with the industry and use of forests, and others called for a Royal Commission of Inquiry.

The Commission received several submissions on the Draft Recommendations Report that the Commission should have taken note of the earlier calls for a Royal Commission of Inquiry to address the conflict and inequity over the use of Tasmania's forests. A submission requested that the Commission recommend that a Royal Commission of Inquiry be held into Tasmanian State Government Agencies and business enterprises involved in the forestry industry.

8.7.2 Analysis

During the hearings the Commission sought supporting evidence justifying claims of corruption and dishonesty and asked whether specific matters had been referred to relevant authorities. No further information or evidence was provided to the Commission and the Commission was advised that no matters had been referred to the relevant authorities.

The Commission considers that it has not received evidence to justify a recommendation for a Royal Commission of Inquiry.



8.8 *Communication of RFA outcomes*

8.8.1 Issue

The Commission received submissions responding to the Draft Recommendations Report of the need for Parties to improve public communication and education of the outcomes of the RFA. Submissions suggested public communication and education was required on the RFA outcomes, improvements in sustainability and conservation requirements, and raising awareness of improvements to Forest Management Systems. Submitters recognised that such a public communication and education program would require additional financial resources.

8.8.2 Analysis

The Commission notes that the matter of public communication and education on the RFA, its implementation and outcomes needs consideration by the Parties when they are responding to Recommendation 5.2.



9. *Monitoring and reporting*

9.1 *Sustainability indicators*

9.1.1 *Background*

The Parties agreed, in Clause 91 of the RFA, to develop and establish an appropriate, practical and cost-effective set of sustainability indicators by the first of December 1999. These sustainability indicators were to:

- have regard to the Montreal Process Criteria which were contained in Attachment 4 of the RFA, and to take account of the processes and regional framework of indicators developed by the Montreal Process Implementation Group;
- assess the criteria for sustainable forest management for Tasmania;
- take account of the results of the Warra Case Study to develop effective regional indicators; and
- include appropriate social and economic indicators.

In developing the sustainability indicators the Parties agreed to:

- determine the frequency of monitoring and reporting;
- provide for, and take account of, the results of public consultation; and
- avoid duplication of effort by developing efficient linkages with the Commonwealth and Tasmanian State of the Forests and State of the Environment Reports.

9.1.2 *Issues*

Only a few submissions on the Background Report commented on the sustainability indicators. Some provided comment on individual indicators and these are incorporated into the relevant sections of this report. Others made general comment that included the need for more indicators on aspects of social and economic trends, forest ecosystem health and vitality, habitat, stand dynamics, weed invasion, soil creation and removal, logging methods and timber revenues. A submission expressed the view that conservationists had condemned the indicators when they were released, and that the data does not allow verification of the interpretations to be independently assessed. The same submission also noted that there was no indication provided on how the indicators will be taken into account and how they relate to the review.

Some submissions received on the Background Report and made at the hearings advocated that social and economic indicators require priority for further development so that they can be better reported at the next five year review. A submission suggested that the efficacy of reserves to protect threatened species should be a key research indicator to support further reviews of the RFA.



9.1.3 Analysis

The RFA requires that the Governments develop a set of indicators in accord with Clause 91. The Background Report explains that sustainability indicators for the first five year review were developed by the Governments in 2000 in accord with Clause 91, including public comment.

Sustainability indicators and their reporting are designed to provide information on the performance and outcomes of forest management under current policy settings, planning arrangements and management practices. This information is to be used to enable sustainable forest management to be continuously improved, where necessary, through changes to these policies, plans or practices, or various combinations of these.

The development of sustainability indicators for forest management is a complex subject that is in its infancy worldwide. The development and measurement of indicators for Tasmanian forests is new work that will improve considerably with time. Although there are many areas where it would be desirable to have more indicators, the reality is that meaningful data are often not readily available or are very expensive to collect. Tasmania and the Commonwealth have rightly decided to commence the measurement of indicators at an achievable level and aim to improve their capacity to measure sustainability with time, within the Montreal Process framework. The Background Report provides details of those indicators where research is being undertaken to develop further indicators.

It is noted that Clause 91 requires the Parties determine the frequency of monitoring and reporting. In the Background Report it is stated that it is intended that the indicators will be reported on a five yearly cycle to meet the RFA review and State of the Forests reporting requirements. This is an appropriate cycle and should include a review of new indicators to be reported, given the requirement to develop, report and apply sustainability indicators in a continuous improvement cycle for monitoring Ecologically Sustainable Forest Management. The Commission has undertaken its review of the RFA based on information provided in the Tasmanian Sustainability Indicators Report.

Comment on individual indicators appears in the parts of this report relevant to the particular indicator. However, several generic comments can be made concerning the reporting of sustainability indicators for the 2007 five year review:

- the data available for monitoring and reporting industry development, social and economic impact, and resource use, requires further development (refer to section 5.4 of this report);
- the current reporting style for many of the indicators has focused more on process (ie how forest management is undertaken) than performance and outcomes of forest management, and how sustainable these are. This approach is consistent with the national framework for reporting on Montreal Criteria and indicators but is structured in such a way that the performance and outcomes of forest management for each indicator are not the central theme to the reporting, with, often lengthy, descriptions of associated management processes. Reporting of indicators should place an increased emphasis on performance and outcomes;
- descriptions of forest management processes that can be readily sourced from relevant policy, planning and operational documents, although useful background, are not particularly useful additions to the sustainability indicators report unless by way of explaining the performance, interpretation or outcome of forest management for the indicator; and



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- limited critical analysis and interpretation of forest management performance and outcomes, and how such performance and trend in indicators affect the overall balance in the objectives and commitments found in the RFA appear in the current Sustainability Indicators Report. More extensive analysis and interpretation would be a useful addition to the sustainability indicators report for the next five year review.

Recommendation 9.1

That the Parties support ongoing research and development for sustainability indicators including, where appropriate, consideration of benchmarks and interpretation to guide performance outcomes.

9.2 Monitoring the Agreement

9.2.1 Background

Clauses 44 and 45 of the RFA required the Tasmanian and Commonwealth Governments to report annually, for the first four years, on the monitoring of milestones as outlined in Attachment 3 to the RFA, and to carry out a review of the performance of the RFA during the last year of each five year period.

The review is required to assess progress of the RFA against its specified milestones and commitments. It specifies, among other things, that the review must:

- be conducted in accord with agreed priorities, procedures and funding arrangements which are to be agreed no later than six months before the end of each five year period;
- invite and take account of public comments;
- use and take account of the sustainability indicators and trends;
- be sufficient to satisfy the requirements for a State of the Forests Report;
- be completed within three months of its commencement; and
- develop a report detailing the review process and its findings.

9.2.2 Issues

No submissions were received on the annual monitoring commitments and very little comment has been received on the five yearly review aspects of the RFA.

The Tasmanian Conservation Trust's submission on the Background Report, the Draft Recommendations Report and at the hearings suggested that in conducting the review, the Commission was within its rights to test progress on commitments and milestones against the purpose of the RFA and to recommend appropriate changes to elements of the RFA. The submission recommended that the Commission broadly interpret the matters for review rather than 'hide behind' Clause 47 that states that the purpose of the review is not to renegotiate the RFA.



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The same submission expressed concern that the Background Report did not outline the requirements for State of the Forests Reporting, or discuss how these requirements would be addressed as part of the Review process. The submission went on to suggest that the Commission should compile and publish a further Background Report, within the meaning of its Act, and that the report should be compiled as a draft State of the Forests Report for public comment.

9.2.3 Analysis

Tasmania and the Commonwealth have reported annually on the progress and achievement of milestones during the period 1998-2001 and the reports have been made publicly available on Government websites. Monitoring of the RFA between the Commonwealth and Tasmania has been effective and efficient and the annual reports were informative. They report what was achieved during the year against the milestones and provide reasons why progress may have been delayed. Reporting of non-milestone commitments by Tasmania was useful and informative. The Commission notes that annual milestone reporting is not required by the RFA after the first five years. The Commission suggests the Parties maintain annual monitoring and public reporting of milestones and commitments.

The *Scoping Agreement for the Five Year Review of Progress with Implementation of the RFA*, signed in July 2001, set out the arrangements for the conduct of the review, including principles, timeframe, public consultation, governance and funding. The Parties enlisted the Commission to undertake the review. This report satisfies the requirements under Clause 45 of the RFA.

The Parties instigated arrangements consistent with the process specified in the RFA, and have ultimately complied with the undertakings contained in Clause 45 of the RFA. Clause 46 of the RFA provides that this review should be completed within three months of commencement. On current scheduling, it appears likely that this review will conclude after the specified three month time frame. Factors contributing to this include the complexity and volume of the subject matter, the time needed to fully digest and incorporate issues raised in public submissions and hearings, and the timing of the State election that was held during the review period. This particular undertaking will be assessed in the next five yearly review.

The State of the Forests Report is a statutory responsibility of the Forest Practices Board under Section 4Z of the *Forest Practices Act 1985* (Tas). The Forest Practices Board tabled the 2002 State of the Forests Report in the Tasmanian Parliament in November 2002. The *Sustainability Indicators for Tasmanian Forests 1996-2001* Report that formed part of the Background Report for this review formed the basis of the 2002 State of the Forests Report. The Forest Practices Board participated in the preparation of the Sustainability Indicators Report and advised the Commission at a hearing that it met the requirements for a State of the Forests Report consistent with Clause 45(v) of the RFA. The Commission accepts the Forest Practices Board's advice on this matter.



Bibliography

- Agriculture and Resource Management Council of Australia and New Zealand, 1999, *Managing Natural Resources in Rural Australia for a Sustainable Future*, National Natural Resource Management Taskforce, Canberra.
- Australian Bureau of Agricultural and Resource Economics, 1997, *Forest Resource Options in Tasmania*, Australian Bureau of Agricultural and Resource Economics, Canberra.
- Australian Greenhouse Office, 2002, *Greenhouse Gas Emissions from Land Use Change in Australia*, Australian Greenhouse Office, Canberra.
- Bacon, C.A., 1999, *Mineral Exploration Code of Practice (Fourth Edition)*, Mineral Resources Tasmania, Hobart.
- Bren, L., and O'Shaughnessy, P., 2001, *An Analysis of the Growth of Eucalypt Forests on Launceston's Water Supply*, Forest Practices Board, Hobart.
- Brueckner-Leech, 1999, *Special Timbers Supply Chain Review*, Department of State Development, Hobart.
- Comprehensive, Adequate and Representative Scientific Advisory Group, 2001, *Report to Chief Forest Practices Officer on Review of Forest Community Thresholds*, unpublished.
- Commonwealth of Australia and State of Tasmania, 2002, *Agreement for the Implementation of the Intergovernmental Agreement on a National Action Plan for Salinity and Water Quality*, unpublished.
- Commonwealth of Australia and State of Tasmania, 2002, *Inquiry on the Progress with Implementation of the Tasmanian Regional Forest Agreement (1997) Background Report*, Resource Planning and Development Commission, Hobart.
- Commonwealth of Australia and State of Tasmania, 1997, *Partnership Agreement Addressing Jointly Agreed National Heritage Objectives and the Provision of Financial Assistance under the Natural Heritage Trust of Australia Reserve and Related Programs*, unpublished.
- Commonwealth of Australia and State of Tasmania, 2001, *Scoping Agreement for the Five Year Review of Progress with Implementation of the RFA*, State of Tasmania, Hobart.
- Dann, T., Gooday, P., Gilmour, C., Hansard, A., Hogan, L., Klijn, N., Lawson, K., Neck, M., Thorpe, S., and Tran, Q.T., 1997, *Economic Implications of Forest Resource Use Options in Tasmania*, Australian Bureau of Agricultural and Resource Economics, Canberra.
- Davies, P., and others, 1999, *Review Panel into the Soil and Water Provisions of the Forest Practices Code – Forest Practices Code Review of Soil and Water Provisions Final Report to the Forest Practices Advisory Council*, unpublished.
- Department of Premier and Cabinet, 2002, *Letter from the Acting Secretary to Isobel Stanley*, 13 December 2002, unpublished.
- Department of Primary Industries, Water and Environment, 1999, *Tasmanian Rural and Marine Industry Profiles*, Department of Primary Industries, Water and Environment, Hobart.



Final Recommendations Report

- Department of Primary Industries, Water and Environment, 2000, *Tasmanian Threatened Species Strategy*, Department of Primary Industries, Water and Environment, Hobart.
- Environment Australia, 2002, *Proposed Amendments to the Environment Protection and Biodiversity Conservation Act and Regulations*, www.ea.gov.au/epbc/about/amendments/index.html.
- Forest Practices Board, 2002, *State of the Forests Report 2002*, Forest Practices Board, Hobart.
- Forests and Forest Industry Council, 1990, *Forests and Forest Industry Strategy*, Forests and Forest Industry Council, Hobart.
- Forestry Tasmania, 1998, *Post-Regional Forest Agreement Review of Sustainable High-Quality Eucalypt Sawlog Supply from Tasmanian State Forest*, Forestry Tasmania, Hobart.
- Forestry Tasmania, 2002, *Sustainable High Quality Eucalypt Sawlog Supply from Tasmanian State Forest Review No.2*, Forestry Tasmania, Hobart.
- Forest Practices Board, 2001, *Forest Practices Board Annual Report 2000-2001*, Forest Practices Board, Hobart.
- Joint Australian and New Zealand Environment and Conservation Council/Ministerial Council on Forestry, Fisheries and Aquaculture, 1997, *Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia*, Commonwealth of Australia, Canberra.
- Margules Poyry/Access Economics, 1998, *Review of Pricing and Allocation Policy of Native Forest Hardwoods in Tasmania*, Margules Poyry Pty. Ltd., Canberra.
- Mesibov, B. 2002, *Review of the Deep Red Myrtle Resource In Tasmania*, Department of Premier and Cabinet, Hobart. (www.dpac.tas.gov.au/policy/rfa)
- Mooney, N. and Holdsworth, M., 1991, *The Effects of Disturbance on Nesting Wedge-tailed Eagles (Aquila audax fleayi) in Tasmania*, Tasforests, December 1991, Vol.3, Forestry Commission, Tasmania.
- National Forest Policy Statement*, 1992, Commonwealth of Australia, Canberra.
- Natural Resource Management Ministerial Council, 2001, *National Framework for the Management and Monitoring of Australia's Native Vegetation*, Natural Resource Management Ministerial Council, Canberra.
- PricewaterhouseCoopers, 1999, *Mid-term Review of the Tasmanian RFA Private Comprehensive, Adequate and Representative Reserve Program*, PriceWaterhouseCoopers, Canberra.
- Public Land Use Commission, 1997a, *Assessment of Ecologically Sustainable Forest Management Systems and Processes: Independent Expert Advisory Group – Final Report Background Report Part G*, Public Land Use Commission, Hobart.
- Public Land Use Commission, 1997b, *Inquiry into areas to be reserved under the Tasmania-Commonwealth Regional Forest Agreement – Final Recommendations Report*, Public Land Use Commission, Hobart.



Final Recommendations Report

- Public Land Use Commission, 1997c, *Tasmania-Commonwealth Regional Forest Agreement Background Report Part H National Estate Report*, Public Land Use Commission, Hobart.
- Public Land Use Commission, 1997d, *World Heritage Report: Record of the Tasmanian World Heritage Expert Panel meeting and a Preliminary analysis of the forest and mineral resources in areas identified by the Panel – Background Report Part I*, Public Land Use Commission, Hobart.
- Resource Planning and Development Commission, 1999, *Inquiry into Areas to be Reserved under the Tasmania-Commonwealth Regional Forest Agreement – Final Recommendations Report: Comprehensive, Adequate and Representative Reserves*, Resource Planning and Development Commission, Hobart.
- Ryan, T., 1999, *A Review of Log Segregation and Utilisation in Tasmania*, Commissioned by the Forests and Forest Industry Council of Tasmania, tabled in Parliament by the Deputy Premier, Paul Lennon MHA, Tasmanian Hansard, Hobart.
- Statement on Sustainable Forest Management in Tasmania, Australia*, 1999, unpublished.
- Tasmanian Government (2002), *Tasmanian Natural Resource Management Framework*, Department of Primary Industries, Water and Environment, Hobart.
- Turner, B. and Brack, C., 1996, *Review of Forestry Tasmania's Sustainable Yield Methodology for its Native Forest Resource*, Australian National University, Canberra.
- Wells, C.H., 2002, *Review of the Tasmanian Forest Practices Board Audit Procedures and Reporting System*, unpublished.
- Ziegler, K.I., 1993, *Leatherwood Nectar Resource Management Report*, Forests and Forest Industry Council of Tasmania, Hobart.



Appendix 1

Terms of reference

Pursuant to Section 14 of the *Public Land (Administration and Forests) Act 1991*, a reference is hereby issued to the Resource Planning and Development Commission. The Commission is to conduct an inquiry and report on the progress with implementation of the Tasmanian Regional Forest Agreement (1997).

1. Description of land

Those lands identified by the Commonwealth and Tasmanian Governments as areas on public land and private land subject to the Regional Forest Agreement.

2. The scope of the inquiry

Acting pursuant to the Scoping Agreement for the Five Year Review of Progress with Implementation of the RFA (2001) as jointly agreed by the Commonwealth and Tasmanian Governments, the Tasmanian Regional Forest Agreement (1997) and using information as identified, the inquiry is to review the performance of the RFA (1997) to assess progress against the agreed milestones and specified commitments in accordance with the provisions of clauses 45, 46, 47 of the RFA (1997).

3. Matters to be taken into account

In arriving at its recommendations the Commission is to take into account the following:

- The Report on Implementation of the Tasmanian Regional Forest Agreement – 1997/2002; and
- The Sustainability Indicators for Tasmanian Forests – 1997/2002.

4. Date for submission of Final Recommendations

The Commission is to provide its Final Recommendations to the Minister by Tuesday, 31 December 2002*.

*Amended



Final Recommendations Report

Appendix 2

Summary of submitters to Draft Recommendations Report

No.	Name	Address
1	Chris Mitchell	Berridale TAS
2	Senator Shane Murphy	Launceston TAS
3	Peter Sims, Launceston Environment Centre Inc	Launceston TAS
4	Dr Peter Pullinger	Burnie TAS
5*	Barry Chipman, Timber Communities Australia	Campania TAS
6	GRJ Anderson	Dynnyrne TAS
7	Helmut Schwabe	Ulverstone TAS
8	Rodney Stagg, Meander Resource Management Group	Meander TAS
9	SM Lindner	Ulverstone TAS
10	Peter Adams	Roaring Beach, Nubeena TAS
11	Gwenda Sheridan	Kingston TAS
12*	Rob Crosthwaite	Snug TAS
13	Kim Booth MHA	Parliament House TAS
14	Geoff Law, The Wilderness Society	Hobart TAS
15	Mark Shelton, Liffey District Resource Management Group	Liffey TAS
16	Andrew McMaster, Timber Communities Australia, Circular Head Branch	Smithton TAS
17	Christine O'Connor Timber Communities Australia, Hellyer Branch	Burnie TAS
18	Paul O'Halloran	North Motton TAS
19*	Ian Johnston, Southern Sustainable Forest Group	Howden TAS
20	Jenelle Penna, Preolenna Mothers Group	Preolenna TAS
21	Tom Cox Timber Communities Australia, North East Tasmania Branch	Scottsdale TAS
22	Glen Arnol Timber Communities Australia, East Coast Branch	Triabunna TAS
23*	Helen Gee	Buckland TAS
24*	Alan Duggan, Huon Resource Development Group	TAS
25	Brett Hooper Tasmanian Farmers and Graziers Association – Forestry	Launceston TAS
26	Brett and Simone Wolf, Blue Lake Lodge	Arthurs Lake TAS
27*	Geraldine de Burgh-Day	Lorrina TAS



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No.	Name	Address
28	Helmut Schwabe	Ulverstone TAS
29	Ronnie Harrison	Rollingbrook Drive, Baytown, Texas USA
30	Owen Muskett Timber Communities Australia, Southern Tasmanian Branch	Richmond TAS
31*	Michael Lynch, Tasmanian Conservation Trust	Hobart TAS
32	Phillip Pullinger, Tarkine National Coalition	Hobart TAS
33	Brendan Thompson, Tasmanian Farmers and Graziers Association	Launceston TAS
34	John Gay, Gunns Limited	Launceston TAS
35*	Stephen Hall, Environmental Defenders Office Tasmania Inc	Hobart TAS
36*	Tasmanian Beekeepers Association Inc Forest Policy Committee	TAS
37*	Allan Dagger Forests and Forest Industry Council	Battery Point TAS
38*	Terry Edwards Forest Industries Association of Tasmania	Hobart TAS
39	Andrew Ricketts Reedy Marsh Forest Conservation Group The Environment Association Inc Great Western Tiers National Campaign	TAS
40	Margie Law	Cascades TAS

** Further submissions provided at the Public Hearings*



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Appendix 3

Summary of submitters to Background Report

No.	Name	Address
1	Ms Laurelle Russell-Atkinson	St Helens TAS
2*	Ms Felicity Hargraves	West Moonah TAS
3*	Mr RG Gardner	Rose Bay TAS
4*	Mr Glen Arnol, Timber Communities Australia	East Coast Branch TAS
5*	Mr Rodney Stagg, Meander Resource Management Group, Timber Communities Australia	Meander TAS
6	Mr Leigh Craven	South Hobart TAS
7	Ms Carla Wisenbeek and Mr Richard Gurrin	(no address supplied)
8*	Ms Jen Clingly, Under Down Under Tasmanian Adventure Tours	Golden Valley TAS
9	Mr David Dettrick	South Hobart TAS
10	Mr Peter Jones	Lenah Valley TAS
11	H Murchison	Hobart TAS
12	Ms Jen Levett	Allens Rivulet TAS
13	TE Dean and S Dean	Evandale TAS
14	Ms Lesley Alcorso	Berriedale TAS
15	Mrs Lois Nyman	South Hobart TAS
16	Mr Peter Ford	Coningham TAS
17	Mr Ben Schiemer	Mountain River TAS
18	Dr Geoff Couser, Doctors for Forests	Hobart TAS
19	Ms Monika and Mr Rudolf Henssen	(no address supplied)
20	Castillo Family	(no address supplied)
21	Email (johng)	(no address supplied)
22	Mr Graham Green, Timber Workers for Forests	South Hobart TAS
23*	Mr Ian Johnston, Southern Sustainable Forest Group	Howden TAS
24	Ms Karena Gregory	West Hobart TAS
25	Ms Fay and Mr Brian Gregory	West Hobart TAS
26	Ms Anne Costin	Kingston TAS
27	M Davey	Blackmans Bay TAS



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No.	Name	Address
28	Dr PL Pigott	Burnie TAS
29	Ms Stephanie McDonald	West Hobart TAS
30	Mr John O'Dell	Whitemark Flinders Island TAS
31	Ms Ros Gregg	St Helens TAS
32*	Ms Julie Stoneman	West Hobart TAS
33	Ms Helen Gee	Buckland TAS
34	Mr Douglas Brown	St Helens TAS
35	Ms Elizabeth Wilson	Lindisfarne TAS
36	Barton Loechel	Launceston TAS
37	Mr Bruce Whiley	South Hobart TAS
38	Ms Patricia Ellison	Ulverstone TAS
39	M HW Richmond	Battery Point TAS
40	Mr Brett Tooker, Peninsula Environmental Network	Koonya TAS
41	Mrs H and Mr W Earles	Lenah Valley TAS
42	Mr Wayne Foss, Tasmanian Logging Association	Kings Meadows TAS
43	Mr Sclepira	New Town TAS
44	Ms Jill Lohrey and J Dean	South Hobart TAS
45*	Mr Allen Dagger, Forests and Forest Industry Council of Tasmania	Hobart TAS
46*	Mr Terry Edwards, Forest Industries Association of Tasmania	Hobart TAS
47	Ms Jill Miller	Mountain River TAS
48	Mr Michael Pullinger	Burnie TAS
49*	Mr Helmut Schwabe	Ulverstone TAS
50	Ms Megan Lawrence	(no address supplied)
51*	Ms Carol McDonough	Dodges Ferry TAS
52*	Ms Kim Eastman	Scottsdale TAS
53	Mr Peter Eastman	Scottsdale TAS
54	Ms Jennifer Sheridan	Glenroy VIC
55	Mr Michael Manhire	Perth TAS
56	Mr Geoff Davies	North Hobart TAS
57	Mr Graeme Dean	South Hobart TAS
58	Ms Jane Catchpole	Blackmans Bay TAS
59	Identical to submission number 34	



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No.	Name	Address
60	Mr Murray James	North Hobart TAS
61	Mr Leonard and Ms Ruth Johnson	(no address supplied)
62	Mr Basil Hickey, Huon Valley Branch, Timber Communities Australia	Huonville TAS
63	Mr Mark Shelton, Liffey District Resource Management Group	Timber Communities Australia TAS
64*	Mr Andrew McMaster, Timber Communities Australia, Circular Head Branch	Smithton TAS
65	Mr Owen Muskett, Southern Tasmanian Branch, Timber Communities Australia	Richmond TAS
66*	Mr Randal Jacobson, North East Branch, Timber Communities Australia	Scottsdale TAS
67	Ms Christine O'Connor, Hellyer Branch, Timber Communities Australia	Burnies TAS
68*	Ms Jenelle Penna, Preolenna Mothers Group, Timber Communities Australia	Preolenna TAS
69*	Mr Geoff Law, The Wilderness Society (Tasmania) Inc	Hobart TAS
70*	Ms Laura Wills	(no address supplied)
71*	Ms Zeshi Fisher	West Hobart TAS
72*	Ms Heather Chaplin	New Town TAS
73*	Mr Peter Sims, Launceston Environment Centre	Launceston TAS
74	Mr Brian Dimmick	Longley TAS
75	Ms Anne Boxhall	Seven Mile Beach TAS
76*	Ms Rosemary Farrell	Mt Hicks TAS
77*	Mr Phillip Pullinger	Hobart TAS
78	Mr William Hugkulstone	Earls Barton ENGLAND
79	Ms Leanne Sherriff and Mr Bruce Ransley	Bushy Park TAS
80	Ms Annette Hackett	Cygnets TAS
81*	Eric, Joan and Fran Short	Rose Bay TAS
82*	Mr Graeme Short	Rosny TAS
83	Ms Cynthia Mitchell	Mt Nelson TAS
84	Dr Michael Lichon, Mole Creek Caving Club	Cascades TAS
85*	Submission identical to No.73	
86	Ms Jennifer Booth	Leith TAS
87	Mr Peter Pullinger and Mrs Leonie Pullinger	Burnie TAS
88	Dr Michael Lichon	Cascades TAS



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No.	Name	Address
89	J Trethewey	Sandy Bay TAS
90	Mrs E M Pugh	Launceston TAS
91*	Mr Barry Chipman, Timber Communities Australia	TAS
92*	Tasmanian Conservation Trust and on behalf of: Club Tarkine Launceston Environment Centre NE Forests Action Group Panama Forests and Denison River Catchment Group Peninsula Environment Network South East Forests Protection Group Upper Meander Catchment Landcare Group	TAS
93	Ms Sarah Fieldsend	Ridgely TAS
94	Mr Nick Towle and Dr Michelle Allen, Tarkine National Coalition	Launceston TAS
95	Ms Jenny Weld	Adventure Bay TAS
96	Mr David Wanless	West Moonah TAS
97	Mr Ian Matthews	Goshen TAS
98*	Ms Helen Hutchinson	Battery Point TAS
99	Ms Patricia Nichol	Scottsdale TAS
100	Mr Tony Cannon, Forest Enterprises Group	Launceston TAS
101	Ms Trudy Disney	(no address supplied)
102*	Ms Debbie Searle, Dorset Waterwatch	Scottsdale TAS
103*	Mr Norm Brown	Ringarooma TAS
104*	Mr Gerard and Ms Camille Velnaar	Glaziers Bay TAS
105	Mr Mark Leech, Tasmanian Farmers and Graziers Association Forestry	Launceston TAS
106*	Mr Andrew Ricketts, Reedy Marsh Conservation Group	Reedy Marsh TAS
107*	Ms Margy Dockray and Ms Kristen Jaehne, Community Resource Auditors	North East Tasmania TAS
108*	Mr Nicholas Wray, Tasmanian Country Sawmillers' Federation	TAS
109*	Mr Hedley Hoskinson Southern Branch, Tasmanian Beekeepers' Association	Woodbridge TAS
110	Senator Bob Brown	Canberra ACT

* Further submissions provided at the Public Hearings



Appendix 4

Summary of issues raised in written submissions to Draft Recommendations Report

No.	Summary
1	<p>The Report is well balanced, objective and meets the terms of reference.</p> <p>Section 4.2.3</p> <p>The statement that “the industry accepts its responsibility ... to deal with any issues or concerns.” should be amended to “any reasonable issues or concerns,” as an unreasonable expectation should not be implied.</p> <p>Section 4.2.3</p> <p>The word ‘minimal’ in the statement that “Forest managers should make Forest Practices Plans available at minimal cost...” implies less than at cost. In this instance the word ‘reasonable’ would be more appropriate because it would be fair to expect industry to provide copies at cost, including the cost of staff time.</p> <p>Section 4.2.3</p> <p>In many instances the contact person for a Forest Practices Plan would be a private land owner, who generally is concerned about people having access to information regarding his or her property. There is already provision within the forest practices system for immediate neighbours to be contacted regarding Forest Practices Plans. The idea of a website contained in the Draft Report is not appropriate.</p> <p>Section 4.2.3</p> <p>The current chair of the Forest Practices Board is the Secretary of the Department responsible for the <i>Environmental Management and Pollution Control Act 1994</i>, as such he is likely to have expertise in ecology and/or conservation, or have access to such expertise. Rather than changing the composition of the Forest Practices Board, further emphasis on public education about the Board would be better.</p> <p>Section 4.13</p> <p>The Forest Practices Code does contain two requirements concerning smoke resulting from forestry activities. The issue falls mainly under the ambit of the <i>Environmental Management and Pollution Control Act 1994</i>.</p>
2	<p>The Draft Report seems to have overlooked the essential requirements of Ecologically Sustainable Forest Management.</p> <p>The National Forest Policy Statement says that Ecologically Sustainable Forest Management of native forests for wood productions involves maintaining a permanent native forest estate while balancing these issues.</p> <p>The Draft Report is not independent or objective.</p>
3	<p>Rejects the Recommendations contained in the Draft Report.</p> <p>The Commission’s failure to provide legal protection to those who were willing to give evidence prevented people from providing such evidence leading to a political whitewash review hijacked by industry and State Government.</p>



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No.	Summary
	<p>Notes that the Reference Panel did not have a representative from the Department of Primary Industries, Water and Environment.</p> <p>Suggests that the Draft Report be rejected and that the Commission recommences the review with open and fair scrutiny.</p> <p>Unless the Draft Report is rejected, there will be no confidence in the outcome of the review, which will reconfirm the community's contempt, distrust and disgust with the RFA.</p> <p>A Royal Commission into forestry practices within Tasmania should be commenced immediately.</p>
4	<p>The review process has not adequately addressed concerns relating to:</p> <ul style="list-style-type: none">• the Tarkine Wilderness area;• the further use of the pipeline corridor in the Tarkine;• the use of 1080 poison; and• the Forest Practices Code. <p>The review into the Pipeline Corridor for its deep red myrtle supplies should have been completed and made public within the first four years of the RFA. The Tasmanian Government has breached clauses 55a and 55c of the RFA.</p> <p>The Commission should not allow logging to proceed within the Savage River pipeline corridor, it should insist on listing the Tarkine area for World Heritage status for its well documented cultural and natural significance.</p> <p>The Commission should review the whole of the RFA process which has fallen far short of its supposed aims.</p>
5	<p>Endorsed the finding that the Federal and Tasmanian Governments are committed to ecological sustainable forest management, and the implementation of the RFA meets this commitment.</p> <p>Concerned that many of the submissions received by the Commission demonstrated a lack of knowledge and misconceptions about the RFA, the industry, forest management and the regulatory and institutional framework in which it operates.</p> <p>Addressing the public debate and providing the public with factual information must be a major priority emanating from the review.</p> <p>The goal of improving public understanding should be included in all the proposed recommendations, as it has been in Recommendation 4.1 in relation to the Forest Practices System.</p> <p>The Government should develop public awareness campaigns to inform the public about the achievements of the RFA, because land managers, industry and environmental groups are all perceived as having a vested interest.</p> <p>Recommendation 3.1</p> <p>Public should be made aware that the commitment to reserve land under the RFA has been exceeded.</p> <p>Recommendation 3.2</p> <p>A minor issue as forest on Hydro vested lands is not available for timber harvesting.</p>



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No.	Summary
	<p>Recommendation 3.3</p> <p>The private forest reserve system should be fully costed, including the social and economic impacts – particularly on small country sawmills – and the Parties should commit to a long term program.</p> <p>Recommendation 3.4</p> <p>Should be incorporated into Recommendation 3.3.</p> <p>Recommendation 3.5</p> <p>Does not support the need to clarify clause 39 of the RFA, as there is no need for targets or timelines for consideration of further World Heritage listing in our forests.</p> <p>Recommendation 3.6</p> <p>The moratorium on harvesting in the Savage River Pipeline should be lifted as soon as possible, as an audited report shows that the region is essential to the sustainable supply of deep red myrtle.</p> <p>Recommendation 4.1</p> <p>Fully support appropriate training of forest workers and a public education program about the Forest Practices System.</p> <p>Funding to support the research and communication functions of the Forest Practices System should be a priority of government; industry should commit to training and its implementation.</p> <p>Recommendations 4.2, 4.3 and 4.4</p> <p>Whilst the Recommendations appear to have merit, they should be combined to reflect their relative importance.</p> <p>Recommendation 4.5</p> <p>In light of the recent listing on the National Estate of the place identified as “Western Tasmania,” this recommendation should be reworded to reflect that the minor outstanding commitments are not critical in the context of achieving the objective.</p> <p>Rather than referring to the clause and attachment number of the RFA outstanding actions should be listed in the Recommendation.</p> <p>Recommendation 4.6 and 4.7</p> <p>Appropriate research is supported. There should be a central point to list all research undertaken as a result of the RFA.</p> <p>Recommendation 4.8</p> <p>The Parties must develop an acceptable funding program with priorities for fire protection and control of pests and diseases in reserves.</p> <p>Recommendation 4.9</p> <p>The system should be based on voluntary principles with land owners given access to incentives and education about such management practices.</p> <p>Recommendation 4.10</p> <p>Concerned that the recommended timeline will not allow for community consultation to proposed changes to the policy on maintaining a Permanent Forest Estate.</p>



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No.	Summary
	<p>Recommendation 4.11</p> <p>Supported.</p> <p>Recommendation 4.12</p> <p>Smoke can be reduced by the use of forest residues for power generation. Successful implementation of this policy will reduce the need to amend the Forest Practices Code.</p> <p>Recommendation 4.13</p> <p>Supported.</p> <p>Recommendation 5.1</p> <p>The Parties to the RFA must commit resources to ensure the social and economic impacts of forest management decisions are fully understood by the community.</p> <p>Recommendation 5.2</p> <p>Supports the recommendation but believes that public education about the RFA covers the broad range of issues and not just industry development.</p> <p>Recommendation 6.1</p> <p>This recommendation is not supported as considers that the reporting of the Sustainable Yield is already transparent.</p> <p>Recommendation 6.2</p> <p>Recommendation is supported but believes that many of the issues raised with the Commission are based on misinformation and a lack of understanding of the supply of special species.</p> <p>Recommendation 7.1</p> <p>The challenge to the tourism industry is to develop attractions within the reserve system and not to depend on access to multiple use forest.</p> <p>Recommendation 7.2</p> <p>Supports the Community Agreement between the Tasmanian Beekeepers Association and Forestry Tasmania.</p> <p>The issue of apiary cannot be confined to multiple use forests alone, and access to leatherwood in reserves should be a key priority of any policy on honey production.</p> <p>Recommendation 9.1</p> <p>Priority of research and development should be given to social and economic factors as environmental indicators are well advanced.</p> <p>Supports Commission's finding that the intention to reserve 95 per cent of land designated as high quality wilderness has been met.</p> <p>Welcomes the finding that "there is no basis to the assertion that the industry received access to more land than it lost as a result of the RFA."</p> <p>The effectiveness of reserves to protect threatened species should be a key research indicator in future reviews of the RFA.</p> <p>The Commission's finding that the forest industry is not exempt from the <i>Threatened Species Protection Act</i> should be highlighted in the final report.</p>



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No.	Summary
	<p>Concerned by allegations of non-lethal dose impacts of 1080, the Commission should be aware that HL Statham in a report on the impact of 1080 on non-target species and priorities for research to the Browsing Animal Research Council in February 1996 found:</p> <ul style="list-style-type: none">• adverse effects of sublethal doses on reproduction and growth reported in the literature relate to laboratory animals. Laboratory and field evidence both suggest that animals will avoid repeated doses of 1080 if possible and some groups will avoid 1080 totally; and• adverse effects of sublethal doses to target and non-target animals in Tasmanian field situations only seem possible where an area is repeatedly poisoned over a relatively short interval of time. <p>The Commission's analysis that resource owners, harvesters and haulage contractors are paid a premium for higher grades of logs and thus have an incentive to maximise utilisation is fully supported.</p> <p>The RFA defines old growth based on a definition agreed nationally in the development of the JANIS criteria. Public debate has seen this definition corrupted and media images portray only one aspect of old growth forest.</p> <p>Governments must commit to a substantial public awareness campaign to correct the misunderstanding and ill informed criticism of the RFA and forest practices. Without this public awareness the forest industry will struggle to expand and to create jobs for future generations of Tasmanians.</p>
6	<p>The Background Report was not prepared by the Commission. The Reference Panel did not include any Tasmanian environmental representation, such as the Department of Primary Industries, Water and Environment.</p> <p>The review has unfairly denied public scrutiny and accountability of the logging industry in Tasmania.</p> <p>The logging industry is ignoring:</p> <ul style="list-style-type: none">• local government planning processes;• public concern over the use of the poison 1080;• tourist industry concern over the visual impact of current logging practice;• public concern about the present behaviour of the logging industry on the long term sustainability of current practices; and• public concern about the performance of the Government Business Enterprise involved in the industry. <p>Expects the Executive Commissioner to direct the Commission to reject the Draft Recommendations Report.</p> <p>Requests that the review giving attention to addressing the widespread concerns that the logging industry is:</p> <ul style="list-style-type: none">• failing to meet its existing legal obligations in a number of respects;• overly secretive and remains unaccountable to the people of Tasmania for its actions;• damaging the Tasmanian environment;• lacks long term sustainability in its present form; and• financially damaging to the Tasmanian economy.



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No.	Summary
7	<p>Concerned that was not formally notified that the Draft Report was available, and that a copy had not been sent to all previous submitters.</p> <p>Concerned that his previous submission was discarded for formal reasons.</p> <p>Concerned that Government-owned healthy native forests that are only 10 to 20 years away from maturity for selective saw log harvesting are being cleared for plantations.</p> <p>Concerned that endangered forest types like wet <i>Eucalyptus viminalis</i> is down to 2% of its original cover, and that the current moratorium on clearing is proving ineffective.</p> <p>Self regulation in an industry that takes place in remote areas is inappropriate as it has the potential to invite deliberate oversights. The lack of appropriate whistle blower legislation is compounding this problem.</p>
8	<p>The review and proposed recommendations clearly establish the need for public education, which should be a priority for the next five years.</p> <p>The Draft Report proves false the criticisms that:</p> <ul style="list-style-type: none"> • 10,000 ha of reserves were not proclaimed; • the industry received access to more land and resource than it lost as a result of the RFA; and • Tasmania had received industry development funds inappropriately. <p>The lack of public education is a key finding of the Review and should have a stand alone recommendation.</p>
9	<p>Proper attention was not given to the review process, resulting in the logging industry having unfair access to forests without public scrutiny and proper accountability.</p> <p>Requests that the Commission rejects the Draft Recommendations Report and recommences the review process in an open and fair manner.</p>
10	<p>Questions the pretence of setting up an RFA Review and then working to undermine what could have been a truly democratic review.</p> <p>Requests that the Draft Recommendations Report be rejected, and that the review board be charged with considering their obligations in creating peace in the forests.</p>
11	<p>The findings in the Draft Report are inadequate, should be rejected and the process started again.</p> <p>The review report will be publicly measured as a statement of the Commission's lack of integrity in respect of the Tasmanian planning process and the RFA in particular.</p> <p>Is appalled with current forest management, of its implications and potential to profoundly alter many aspects of land use, cultural landscapes, community social patterns of settlement, the tourism industry, as well as its detrimental effects on ecosystems, watersheds and natural systems.</p> <p>The forestry industry can not provide longitudinal well researched data to illustrate compliance with the Land Use Planning and Approvals Act Schedule 1 Objectives.</p> <p>Cultural heritage landscapes are not mentioned in documentation relating to forest management.</p>



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No.	Summary
	<p>The Draft Report fails to provide a balanced account of what the situation is, and does not take up the issues relating to the omissions from the RFA in relation to conservation, environmental, heritage and landscape.</p> <p>The Recommendations are not a rigorous, far reaching, assessment and evaluation of five years of RFA implementation, of its shortcomings, its meaning its integrity, and what it has or has not delivered.</p> <p>No Tasmanian environmental or conservation interests were represented on the 'expert' Committee to assist the Commissioners, with only one environmentally minded person present.</p> <p>Recommends that a Royal Commission is warranted to rigorously examine how the forestry industry has effected, and is effecting, change in land use patterns, cultural heritage landscapes and settlement patterns since 1997.</p> <p>Recommends that forest uses other than timber production be determined in light of the Land Use Planning and Approvals Act Schedule Objectives, and that clauses 20(7) and 20(7A) of the <i>Land Use Planning and Approvals Act</i> be repealed.</p> <p>The Commissioners appear not to have tackled the inadequacy of industry reporting in their analysis of 9.1.3.</p> <p>The Commissioners failed to elicit independent and contrasted views to those of the Tasmanian forest industry. As a result the review process was seriously undermined because a balance in expert views was not sought.</p> <p>Recommendation 9.1</p> <p>Is vague and so generalised as to have little real punch or meaning. It needs to be scrapped and redone.</p> <p>Recommends that Attachment 1, clauses 12 and 13 be repealed in the RFA, and that regional studies of forested lands be urgently undertaken, especially in areas designated as production forest in Management Plans or Private Timber Reserves.</p> <p>Recommends that transparency with respect to Attachment 1, clause 17 be undertaken to determine whether any such delegation was made and why it was to be restricted to Comprehensive Regional Assessment lands only and why it can not now be implemented.</p> <p>Recommends that for the period 2002-2007 research should be directed towards the following in Attachment 13:</p> <ul style="list-style-type: none">• Clause 1 dot point 4;• Clause 2 dot points 2 and 3• Clause 4 – regional studies of cultural heritage;• Clause 5 – non-wood values of the old growth forests;• Clause 6 – non-chemical uses of plantation management; and• Clause 9 dot points 1, 2, 5 and 6. <p>Old growth definition it is not well understood and claims that there has been a considerable increase in the area reported, raising the question of what has constituted the definition of old growth in the review.</p>



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No.	Summary
12	Generally accepts assurances given by community leaders, especially Government, about the processes of compliance with agreements, legislation etc. However, concerned by information provided by the Tasmanian Conservation Trust and seeks a response to their claims.
13	<p>The inclusion of a non-independent person as a Commissioner is inappropriate and that the result will have no credibility.</p> <p>Recommends the immediate end of the current review process, and its recommencement with a panel that is capable of an even handed review that will afford procedural fairness and natural justice.</p>
14	<p>The draft recommendations are a farce. The massive destruction of forest and the vast number of submissions have been ignored.</p> <p>There is no mention in the Draft Recommendations Report of the major point of the submitter's previous submission, being the danger posed to the Tasmanian community of regeneration burns escaping and destroying property, heritage, life and limb.</p> <p>Further engagement with the inquiry would be a waste of time.</p>
15	<p>The Commission's recommendations include the developing of data to monitor social and economic indicators associated with the RFA. Believes that the Commonwealth must contribute to implementing this recommendation by resourcing the Social Assessment Unit as part of the Federal Department of Agriculture, Fisheries and Forestry.</p> <p>Recommendations 5.1 and 5.2</p> <p>Supports the recommendations.</p> <p>Concerned no recommendation has been made in relation to ensuring that adequate resources are available for sustainable forest management of the reserve system.</p> <p>The Commission should recommend a timetable to achieve the milestone of having in place a code of practice for reserve management.</p>
16	<p>Considers that the review meets both the requirements of the RFA and the terms of reference for the inquiry.</p> <p>Supports the finding that the Parties have made substantial progress in implementing the RFA.</p> <p>Recommendation 3.6</p> <p>Concerned that the timeframe within the recommendation may not be possible as it is less than 10 weeks from when the Commission's final report will be tabled in Parliament which may not be sufficient time for government to make an informed decision.</p> <p>Shares the Commission's concern at the lack of digital mapping of the National Estate. This is supported by recent listings of the Australian Heritage Commission of the Tarkine. Mapping of the boundaries would enable better understanding of the listings.</p>
17	<p>Welcomes the recommendations relating to industry development and believes they are a sound basis for the future of the industry and the people who depend on it.</p> <p>Report demonstrates that the RFA has met all of its environmental commitments and apart from some fine tuning, meets the intent of Commonwealth legislation covering the National Estate, World Heritage values and environmental protection and management.</p>



Final Recommendations Report

No.	Summary
	<p>Report shows Tasmania has acted to ensure that reserves created by the RFA have been appropriately created.</p> <p>The finding that the Parties to the RFA are committed to Ecologically Sustainable Forest Management is good news, and meets three key goals of the Tasmania <i>Together</i> process being:</p> <ul style="list-style-type: none"> • Goal 21 – value and protect our natural diversity; • Goal 23 – ensure there is a balance between environmental protection and economic and social development; and • Goal 24 – ensure our natural resources are managed in a sustainable way now and for future generations.
18	<p>Finds it surprising that the Commission has found in favour of the RFA when there are so many glaring deficiencies in its implementation. The Draft Report should be rejected.</p> <p>The RFA has failed on environmental grounds, for example since the signing of the RFA:</p> <ul style="list-style-type: none"> • more forests are being harvested then ever before, with a greater proportion being exported as either woodchips or whole logs; • more timber is being burnt on the forest floor – up to 70% in some coupes; • greater smoke pollution from regeneration burns; • 1080 and atrazine are still being used to the detriment of rural social amenity; • water quality is being compromised; • soil is being lost; • habitat destroyed; and • diverse ecosystems being replaced by rows of monoculture plantations. <p>The forestry industry has a multitude of exemptions from threatened species legislation, and planning regulations and laws through Private Timber Reserves.</p> <p>The RFA has not delivered on social benefits as rural communities have been lost or decimated.</p> <p>The RFA has failed on economic grounds as job numbers have fallen since the signing of the RFA, and Forestry Tasmania has an appalling return on equity.</p> <p>The Commission has failed to:</p> <ul style="list-style-type: none"> • properly represent material submitted to it; • make sure that native vegetation has been reserved on private land; • adequately look at other values of forests besides the exploitative values; • make recommendations on the future use of the pipeline corridor in the Tarkine; • properly investigate the 10,000 ha of forest reserved which were meant to be gazetted; • adequately look at issues to do with water quality and quantity in catchment areas; and • take into account, and be responsive to, new information which has become available.
19	<p>The review fails to fulfil its obligations and all the evidence submitted should be re-examined to achieve a set of fair, unbiased, practical recommendations that would led to a peaceful stable forestry industry in Tasmania.</p> <p>Special species timber is less that 1% of Forestry Tasmania's business and therefore it pays no regard to its ongoing maintenance of supply. No audit has been done on celery top pine or leatherwood, or is planned to be carried out.</p>



Final Recommendations Report

No.	Summary
	<p>Forestry Tasmania's research into alternatives to clear felling of old growth forests was under funded and repeatedly delayed, and that none of the independent auditors associated with the trial were happy with it.</p> <p>Regrowth and plantation eucalypt forests are more vulnerable to catastrophic fires than mixed native forests, as well as greatly reducing catchment run off.</p>
20	<p>Endorses the findings that the RFA has been implemented and that the Parties are fully committed to the process.</p> <p>Pleased with the open and transparent nature of the inquiry and the opportunity that has been given to the public to have input into the review.</p> <p>Particularly support recommendations 5.2, 5.1 and 9.1.</p>
21	<p>The review shows that a world class reserve system has been created that protects a broad range of environmental values, and that the State's forest practices system goes a long way towards achieving Ecologically Sustainable Forest Management.</p> <p>The review shows that the industry development benefits of the RFA have yet to materialise.</p> <p>The lack of industry development benefits is a result of the continued public debate about forestry, and the false accusations levelled at the industry.</p> <p>The Commission should recommend that future government funding of environmental groups should be tied to telling the truth about the achievements of the RFA.</p> <p>Governments must commit to the provision of information through a public awareness process and via the education system.</p>
22	<p>Recommendation 5.1</p> <p>Is vital to the successful implementation of the RFA.</p> <p>Recommendation 5.2</p> <p>Supports recommendation to clarify the intent of Attachment 12 of the RFA, and believes that this recommendation should also include the need to improve social and economic data and information on the regional impact of industry.</p> <p>Recommends a separate recommendation about public education, covering the board range of social, economic and environmental outcomes of the RFA.</p> <p>Supports the findings of the Review that the RFA has been substantially implemented and that the Parties are committed to Ecologically Sustainable Forest Management.</p>
23	<p>Recommends the rejection by the Commission of the Draft Recommendations Report.</p> <p>The Commission must take responsibility for its failure to assess the RFA commitment with any credibility.</p> <p>Requests a full, open review be initiated, that can be accepted as publicly accountable.</p>
24	<p>The detailed analysis undertaken by the Commission shows that the RFA has been implemented and that our forests are being sustainably managed.</p> <p>As a report card on the achievements of the RFA the Draft Report shows very high achievements in the creation of a Comprehensive, Adequate and Representative reserve system.</p>



Final Recommendations Report

No.	Summary
	<p>Agrees with the analysis that the consumption of forest waste for power generation has the same net effect on carbon dioxide levels as allowing the waste to either rot on the forest floor or be burnt in regeneration burns.</p> <p>Wood fired power stations have the potential to mitigate the effects of smoke from regeneration and fuel reduction burns, and the successful construction of such a power station may influence the review of the Forest Practices Code as outlined in Recommendation 4.12 of the Draft Report.</p>
25	<p>Congratulates the Commissioners and the Reference Panel on the thorough review and staying within the terms of reference.</p> <p>Recommendation 3.3</p> <p>Supports the expenditure of the committed \$30 million to provide the full private land Comprehensive, Adequate and Representative reserve system as committed by RFA clause 50.</p> <p>The \$30 million will not provide 100,000 ha of anything, it is the amount committed by the Parties and once spent meets the commitment in clause 50 of the RFA.</p> <p>Supports maximum use of the committed funds to secure Comprehensive, Adequate and Representative values and seek further funding for ongoing management.</p> <p>Recommendation 4.1</p> <p>Supports the recommendations for improving efficacy, process and performance of the Forest Practices System, but takes issue with the first part of the recommendation: <i>Improving transparency and communications, in particular, public access to information on Forest Practices Plans, through a central access point designed to improve industry consultation with neighbours and local communities.</i></p> <p>The Good Neighbour Charter, while focused on plantation development in the rural landscape, has provided an effective vehicle for overcoming many of the neighbour related issues in that context.</p> <p>Making Forest Practices Plans publicly available will lead to more division and subversive activity than currently exists.</p> <p>Recommendation 4.4</p> <p>The private land conservation component of the RFA was a comprehensive, rigorous and robust process of consultation and development of a system that provides for conservation outcomes in addition to Forest Practices requirements on Private Land.</p> <p>Unless there is a similar acceptance of:</p> <ul style="list-style-type: none"> • first Crown then private; • voluntarism; and • compensation for loss of right and commercial value and ongoing management payments, <p>then do not support further non-voluntary or backdoor conservation measures.</p> <p>Recommendation 4.10</p> <p>Recommendation pre-empt the review of the Permanent Forest Estate policy. Private land owners committed to 80% with 50% thresholds through the RFA. Does not support the increasing thresholds across the forest estate. Supports maintaining the private land level at 80% and increasing Crown land to whatever the State accepts.</p>



Final Recommendations Report

No.	Summary
26	<p>Logging operations are having a detrimental impact on the submitter's tourism business.</p> <p>No measures are in place to prevent detrimental run off from the logging operations on Tasmania's most important trout fishery, because no one uses the water for drinking.</p> <p>Logging operations were exempt from planning laws, and are under the control of the Forest Practices Code.</p> <p>Notes that the Forest Practices Code does not consider the impacts of logging on tourism operations, and that the Forest Practices Code should have provision for a more open consultative process with neighbours and the local business community before commencing logging operations.</p>
27	<p>Alleges breaches of the <i>Forest Practices Act 1985</i> and the RFA in coupe LA028a.</p> <p>Enclosed a copy of a complaint lodged with the Forest Practices Board.</p> <p>The objective of preserving representative forest types for our children is not being followed, and the objective of protecting the environment is not being upheld.</p>
28	<p>The review terms of reference prohibit a meaningful outcome.</p> <p>The Commission is preoccupied with public relations rather than addressing the real problems and flaws with a self regulatory system, such as the lack of whistle blower legislation.</p> <p>Complaints to the Forest Practices Board about breaches of the Code do not automatically ensure that the complainant receives a report, even if it leads to a fine for the offender.</p> <p>Findings on green house gas emissions are vague and defer solutions.</p> <p>There is a clear failure to recognise the diversity of old growth forest values apart from their exploitation for woodchips and a few sawlogs.</p> <p>The Commission failed to make recommendations that allow for proactive measures to prevent further species and forest communities entering the unacceptable list for threatened and endangered life forms.</p> <p>The RFA and this review process have failed to live up to the community's expectations in regard to planning and management of its common resources and environment. The Draft Report should be rejected.</p> <p>A Royal Commission style of inquiry into all aspects of forestry is needed to restore public confidence.</p>
29	<p>The RFA has failed to create new jobs, protect threatened species, protect 15% of 1750 old growth forests, protect biodiversity and protect reserves set down under the RFA.</p> <p>The review needs to be reconstituted with transparency and the participation of all Parties at each step in the process.</p>
30	<p>Reserving old growth forest in perpetuity is a flawed, politically motivated concept, which ignores the natural succession from eucalypt old growth to rainforest that actually takes place in wet forests in the absence of fire.</p> <p>Concerned that the Commission had not made stronger recommendations about the management of reserves, especially in relation to fire management.</p> <p>Concerned that there is not a separate recommendation to address the lack of public awareness of the RFA.</p>



Final Recommendations Report

No.	Summary
	<p>Education is the key to the public accepting the RFA and the associated economic, social and environmental benefits.</p>
31	<p>The review has been seriously compromised by the Background Report not being a document prepared by the Commission, and by the Reference Panel for the review including no representation from the Department of Primary Industries, Water and Environment.</p>
	<p>Recommends that the review be recommenced.</p> <p>The Draft Report dismissed concerns about protection of old growth forests raised in many submissions, and wrongly suggested that these submissions were questioning the RFA agreed definition of old growth. The submitter's submission with respect to old growth was that it had been wrongly identified. The treatment of this issue in the Draft Report is a misrepresentation of the evidence presented to the inquiry.</p> <p>The Commission received evidence that consultation on management prescriptions for RFA priority species had been with the Scientific Advisory Committee of the <i>Threatened Species Protection Act 1995</i> (Tas) and with selected members of the scientific community. The Draft Recommendations Report should have stated that a breach of the RFA had occurred in relation to the public consultation requirement contained within the RFA for changes to management prescriptions for RFA priority species. The term public consultation should have the same meaning as it has in other legislation, ie that any member of the public has the opportunity to comment.</p> <p>The publication of the deep red myrtle report on the internet, with no action taken to inform stakeholders to the Review that the document was available, does not comply with the RFA requirement that the deep red myrtle report be published.</p> <p>Does not agree that all RFA performance benchmarks have been met. The Commission should have known this if diligence been applied to the task.</p> <p>The RFA requires the State to develop and implement a Threatened Species Protection Strategy by 31 December 1998. The Threatened Species Strategy was not made public until November 2000, and the implementation plan for the Strategy has still to be prepared. The Draft Report is silent on why this commitment has not been met.</p> <p>The RFA requires the State to develop and implement a Tasmanian Biodiversity Strategy by 31 December 1999. A draft of Tasmania's Nature Conservation Strategy was released in June 2001 for public comment. The Draft Report is silent on why this commitment has not been met.</p> <p>The way in which the Draft Report deals with management plans and management planning is superficial and bears no relationship to reality. To suggest that this commitment has been 'substantially met' and 'substantial progress has been made' is outlandish.</p> <p>Recommendation 7.1</p> <p>This recommendation is strongly supported, however such a recommendation should not be necessary if the Parties were committed to the RFA milestones.</p> <p>The Draft Report contains a lack of recommendations where recommendations are appropriate, and recommendations where they are made which are too vague to ensure the obligations will be implemented in a manner consistent with the RFA's stated purpose.</p> <p>The Tasmanian Government has failed in its RFA obligations to consider future management options for the Savage River Pipeline Corridor.</p>



Final Recommendations Report

No.	Summary
	<p>The Tasmanian Government has failed to introduce measures to encourage native vegetation protection on private land and to complete the review of the provisions of the Permanent Forest Estate policy.</p> <p>Does not consider that the Commission inquired properly into the evidence provided concerning the failure of the Tasmanian Government to gazette about 10,000 ha of Forest Reserves identified by the RFA.</p> <p>Consider that the Recommendations in relation to industry development, in the face of almost total lack of data, places the Commission in a spurious legal position relative to its obligation to describe the resource that is the subject of its attention.</p> <p>The Draft Report fails to consider a range of relevant external administrative and legal processes that may impact on the RFA, including 1080, National Competition Policy and the Tasmania <i>Together</i> process.</p> <p>The Commission has ignored the current review of approval of 1080 by the National Registration Authority which could have impacts on the implementation of the RFA.</p> <p>The National Competition Council has published its intention to review during 2001-2002 forestry legislation, including the <i>Forestry Act</i> and the <i>Forest Practices Act</i>. For the Commission to find that the competition obligations in relation to the RFA have been met before the National Competition Council completes its review is unacceptable.</p> <p>The Commission's failure to investigate the interaction of the implementation of the Tasmania <i>Together</i> process on the RFA is unacceptable given the large proportion of submission that identified Tasmania <i>Together</i> as relevant.</p> <p>The Commission failed to take account of new information provided to the review, which is significant in terms of the agreed purpose of the RFA. Such new information relates to:</p> <ul style="list-style-type: none"> • the impacts of forestry and land clearing on water yield and water quality in catchments; • social and economic impacts on small, rural communities of conversion of both farmland and native forest to plantations by forestry corporations; and • concerns over whether the RFA reserve system is comprehensive, adequate and representative.
32	<p>Disappointed and frustrated with the recommendations contained in the Draft Report.</p> <p>Submissions made by community members and conservation groups have been blatantly ignored and misrepresented.</p> <p>The toothless recommendations made in the Draft Report confirm that this process was never meant to be a true review or take into account relevant concerns, and is a sad inditement of the Commission</p> <p>A Royal Commission into the forestry industry in Tasmania is required to bring accountability to the current system.</p>
33	<p>Supports a proper review of the current policy on the maintenance of a Permanent Forest Estate. Any review can not be done behind closed doors.</p> <p>All stakeholders need to be involved, and the review process needs to be transparent, rigorous and fair, and the process needs to take full account of social costs and benefits of policy options.</p>



Final Recommendations Report

No.	Summary
	<p>There is no justification for the Commission attempting to pre-empt a review of the policy on maintaining a Permanent Forest Estate, by stipulating in advance what its outcomes must be.</p> <p>Notes that there may be a need to address the current lack of coverage of threatened communities by the <i>Threatened Species Protection Act</i>.</p> <p>Recommendation 4.10</p> <p>Recommends that Recommendation 4.10 be amended to read:</p> <p style="padding-left: 40px;">That the State initiates a review of the policy on maintaining a Permanent Forest Estate taking into account more recent information on forest community conservation.</p>
34	<p>Welcome the Commission's findings that the Parties have made substantial progress in implementing the RFA, and the fact that where specific performance benchmarks were identified in the RFA these have been met on nearly all occasions and, if not met, substantial progress has been made.</p> <p>Recommendation 3.1</p> <p>Note the Commission's view that reservation of some forest communities in excess of the JANIS criteria is an inevitable outcome of the establishment of the Comprehensive, Adequate and Representative reserves, however, the issue of industry sustainability must rank equally with that outcome.</p> <p>Recommends Recommendation be amended to insert "... and to ensure no further diminution of wood supply to the industry" after the word 'survey.'</p> <p>Recommendation 3.2</p> <p>Supports the recommendation provided the review of the HEC vested land requirements is completed prior to formal reservation.</p> <p>Recommendation 3.3</p> <p>Supports the recommendation.</p> <p>Recommendation 3.4</p> <p>Does not oppose the recommendation but submits that wood production should be given equal priority ranking with other potential multiple uses of a forest including reservation with the Private Forest Reserve Program.</p> <p>Recommendation 3.5</p> <p>Supports the recommendation.</p> <p>Recommendation 3.6</p> <p>Agrees that the decision on the future access to the deep red myrtle resource in the Savage River Pipeline Corridor needs to be made sooner rather than later.</p> <p>Recommendation 4.1</p> <p>There is no case for a central access point for any person to access any Forest Practices Plan, and that the <i>Forest Practices Act</i> and the Forest Practices Code contain appropriate provisions concerning consultation on Forest Practices Plans.</p> <p>Suggests that recommendation be amended to read:</p> <p style="padding-left: 40px;">landowners are encouraged to make details in a Forest Practices Plan available to Parties with a legitimate interest and to demonstrate that any potential adverse environmental impacts of the forest practices on the interested party have been properly considered and accounted for in the Forest Practices Plan.</p>



Final Recommendations Report

No.	Summary
	<p>Agrees that the roles of the Forest Practices Board, Forest Practices Officers and industry, and the public and legal policy framework needs to be much better explained to the general public.</p> <p>Agrees that the Forest Practices System needs to be adequately funded and that industry is a key stakeholder.</p> <p>Agrees that forest practices training for all forest operatives is essential and should be supported by industry.</p>
	<p>Recommendation 4.2</p> <p>Concerned that the timeframe recommended may be too constrained and urges a more relaxed approach.</p>
	<p>Recommendation 4.3</p> <p>Supports the recommendation.</p>
	<p>Recommendation 4.4</p> <p>To the extent that this recommendation is in accordance with the Threatened Species Strategy it is supported.</p>
	<p>Recommendation 4.5</p> <p>Supports the recommendation.</p>
	<p>Recommendation 4.6</p> <p>Supports the recommendation.</p>
	<p>Recommendation 4.7</p> <p>The recommendation is strongly supported, however the review encapsulated by the recommendation must incorporate industry representatives and not simply the Parties to the RFA.</p>
	<p>Recommendation 4.8</p> <p>Suggests that reserves managed by the State outside State forests pursue accreditation to ISO 14001.</p>
	<p>Recommendation 4.9</p> <p>The recommendation is welcomed, however in the absence of funding assistance the recommendation is likely to only achieve limited success.</p>
	<p>Recommendation 4.10</p> <p>Does not agree with wording that “ subsequent to the review...the State amends the policy to increase the levels of retention of native forest...”</p> <p>Permanent forest estate guidelines and policy implementation are working well and see no need to change it.</p> <p>If a review of the permanent forest estate policy does go ahead it must be with the full participation of all relevant private sector stakeholders, and consider the prospect of differential levels of retention as between reserves, public land and private land.</p> <p>Any amendment to the Permanent Forest Estate policy should provide that compensation is payable in the event any private landowner is prevented through the application of the policy from harvesting forest areas for any reason.</p>



Final Recommendations Report

No.	Summary
	<p>The timeframe within the recommendation is not appropriate, and that if the review does proceed, a more realistic timeframe will permit an opportunity for meaningful consultation with private sector stakeholders.</p> <p>Recommendation 4.11 Supports this recommendation.</p> <p>Recommendation 4.12 Suggests amending the recommendation to read:</p> <p style="padding-left: 40px;">That the Forest Practices Board considers during the next review of the Forest Practices Code the issue of smoke management from forestry operations including assessing the smoke management guidelines issued by the State Fire Management Council for their applicability and suitability for adoption into the Forest Practices Code.</p> <p>This recommendation is appropriate in its targeting of smoke generated by forestry activities in that it appears to permit the examination of the problem from a broader perspective through the State Fire Management Council guidelines for smoke management.</p> <p>This issue is broader than the role of the Forest Practices Board and therefore the State Fire Management Council is the appropriate body to provide guidelines to administer smoke management. However, it should be open for the Forest Practices Board to tailor any guidelines to suit the needs of forestry operations.</p> <p>Recommendation 4.13 Supports the recommendation.</p> <p>Recommendation 5.1 Welcomes this recommendation and submits that the data collection should include the same level of comprehensiveness as that compiled to measure the conservation benchmarks contained in the RFA.</p> <p>Recommendation 5.2 Welcomes the recommendation.</p> <p>Recommendation 6.1 Supports the broad thrust of the recommendation, and notes that it is important that the sustainable yield reviews provide practical data on the quality of the resource being provided to the industry.</p> <p>Recommendation 6.2 Supports the recommendation.</p> <p>Recommendation 7.1 Agrees that a definite strategy to promote the development of forest based tourism is required. Perceives the need for increased cooperation between the forestry and tourism industries to ensure better and more sympathetic planning of activities reduces the prospect of periodic conflict.</p> <p>Recommendation 7.2 The recommendation is appropriate, however it is important to note the limited nature of the submission referred to and that there is at least anecdotal information that the views presented may not accord with those of the industry as a whole.</p>



Final Recommendations Report

No.	Summary
	<p>Fully endorses the right of the apiary industry to secure access to a leatherwood resource but this should not be to the exclusion of the wood production industry. The apiary industry could access leatherwood resource within the Comprehensive, Adequate and Representative reserve system.</p> <p>Recommendation 9.1</p> <p>Supports the recommendation. It is important that the range of sustainability indicators is as broad as possible and that economic and social indicators are enhanced.</p> <p>There is no scientific basis to claims being made about leaching of 1080 into watercourses and subsequent exposure to humans or stock. The use of 1080 is not a consequence of the practice of clear felling and plantation establishment, but a necessary tool when conducting any cropping/farming activity in Tasmania.</p> <p>The forestry industry has been very proactive in researching alternatives to the use of, and reduction in use of 1080.</p> <p>Industry is committed to sustainable forest management principles that are based upon environmentally sound, economically viable and socially desirable forest management practices.</p> <p>Supports the Australian Forestry Standard.</p>
35	<p>Institutionalised barriers to effective public participation that currently exist within Tasmania's forest management systems are a root cause of community disaffection with the forestry industry.</p> <p>The problems stem predominantly from the dislocation of the Forest Practices System from Tasmania's Resource Management and Planning System.</p> <p>The Commission should in its final recommendations:</p> <ul style="list-style-type: none">• acknowledge the problems stemming from the dislocation of the Forest Practices System from the Resource Management and Planning System and the consequent institutional barrier to public participation in forest management;• acknowledge that this lack of integration and lack of public participation, hinders the implementation of Ecologically Sustainable Forest Management as defined in the RFA and the sustainability indicators, and is in conflict with the terms and objectives of the RFA; and• recommend that appropriate legislative measures to rectify the situation be investigated as a matter of priority. <p>Does not dispute the Commonwealth's accreditation of Tasmanian's Forest Management Systems was appropriate, nor that the State has largely fulfilled its commitment under Clause 64 of the RFA. However, believes that the commitment is an ongoing one to continually develop and improve its Forest Management Systems in line with Ecologically Sustainable Forest Management.</p> <p>The statutory objectives of the Resource Management and Planning System reflect the principles and objectives of Ecologically Sustainable Forest Management as defined in the RFA and the National Forest Policy Statement, and that the objectives of the Forest Practices System alone do not.</p> <p>The Private Timber Reserve concept is repugnant to the objectives of Ecologically Sustainable Forest Management.</p>



Final Recommendations Report

No.	Summary
	<p>In recent years there has been improvements in policy coordination and opportunities for public participation at the board strategic and policy levels.</p> <p>At the operational level coordination of forestry with community stakeholders and local government is often poor and opportunities for public participation in forest related decision making are limited or non-existent.</p>
36	<p>The protocol is inadequate for the needs of beekeepers.</p> <p>Beekeepers have been warning Forestry Tasmania and the State Government about the harmful effects of clear felling and burning on leatherwood rich old growth forest for at least 30 years.</p> <p>There is sufficient evidence to apply the precautionary principle and introduce a moratorium whilst changes to forest policy are negotiated to properly support the beekeepers and the pollination services they provide.</p> <p>There is a lack of information about the distribution of special species in wet mixed forests, including the lack of an up to date model of leatherwood distribution, in contrast to the wealth of research and information on eucalypts for every aspect of the timber industry.</p> <p>Beekeepers are effectively excluded from:</p> <ul style="list-style-type: none">• forest planning relating to the retention of leatherwood; and• appeals against forest harvest plans that negatively affect their interest through the Forest Practices Code and Forest Practices Appeals Tribunal. <p>Attempts to solve these problems through increased access to reserved lands is nothing more than an attempt to shift the responsibility for the mismanagement of State Forests to other land managers.</p> <p>The Commission should recommend:</p> <ul style="list-style-type: none">• an immediate moratorium on the list of leatherwood coupes and areas published by the Southern Beekeepers in the Public Notices section of <i>The Mercury</i> on 24 September. The moratorium needs only be temporary until the new leatherwood management protocol described in the next recommendation point is developed.• a leatherwood management protocol which retains commercially viable quantities of leatherwood from production coupes, is mandated in the Forest Practices Code and supervised by the Forest Practices Board. <p>Suggested inclusions within the proposed leatherwood management protocol.</p>
37	<p>Congratulates the Commission on a thorough review of the implementation of the RFA.</p> <p>Supports the recommendation to governments that public communication is imperative and that resources are needed for the task.</p> <p>The Commission's finding with respect to claims that 10,000 ha of forest reserves have not been declared is supported.</p> <p>The protection targets for the Private Forest Reserve System are unlikely to be realised unless more funds are supplied to complete the program.</p> <p>The concept of a sustainable commercial harvest of deep red myrtle needs to be determined between the resource managers and the industry.</p>



Final Recommendations Report

No.	Summary
	<p>Does not support the timeline of December 2002 for the Government's decision in relation to access to the deep red myrtle resource.</p> <p>More effective communication of the work of the Forest Practices Board should proceed through funding from outside the industry.</p> <p>Agrees that measures of effectiveness of management plans for reserves should be in place by the time of the next five year review of the RFA.</p> <p>There is little point in expending large amounts of energy in policing the activities of harvesters when impacts downstream of forestry operations go unmanaged.</p> <p>Agrees that it is important that management of reserves be raised to the point where independent audit under a recognised international standard can occur.</p> <p>The Tasmanian forest industry is intent on finding alternatives to 1080 to control browsing damage and a number of research projects are progressing.</p> <p>The milestone set for development of a Reserve Management Code of Practice has not been met and endorses the view that financial and staffing support for management may be inadequate.</p> <p>A change from clearfelling to selection felling in wet old growth eucalypt forests will immediately lead to a reduction in the annual volumes of eucalypt and special species sawlogs and veneer logs made available to industry.</p> <p>The Commission should highlight that there are various silvicultural systems used in Tasmanian wet forests that might be termed clearfelling that are a mixture of clearfelling and selection logging.</p> <p>Agrees with the Commission's findings about the effect of the lack of access to the Forest Industry Structural Adjustment Program funds.</p> <p>Supports the call for periodic resource, economic and social assessments and agrees that Commonwealth Bureaus are best able to develop socio-economic indicators.</p> <p>The Commission's recommendation in relation to public education and information is the crux of the Review.</p> <p>Recommendation 5.2</p> <p>The Recommendation is meritorious in intent but may not achieve the best result in practice. An industry vision is properly the job of industry. Therefore recommend that Governments work with the Forests and Forest Industry Council to prepare the industry plan, while providing the investment climate to ensure that it can be put into action.</p>
38	<p>Recommendation 3.1</p> <p>Support the observation by the Commission that greater communication on changes to boundaries and the reasons for those changes would be advisable.</p> <p>Note the Commission's view that reservation of some forest communities in excess of the JANIS criteria is an inevitable outcome of the establishment of the Comprehensive, Adequate and Representative reserves, however, the issue of industry sustainability must rank equally with that outcome.</p> <p>Recommends an amendment to Recommendation 3.1 by inserting "... and to ensure no further diminution of wood supply to the industry" after the word 'survey.'</p>



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No.	Summary
	<p>Recommendation 3.2</p> <p>Supports this recommendation provided the review of the HEC vested land requirements is completed prior to formal reservation.</p> <p>Recommendation 3.3</p> <p>Supports recommendation as it is apparent that there have been considerable delays in the implementation of the Private Land Reserve system and that it is unlikely to meet its protection targets without a further allocation of funds.</p> <p>Recommendation 3.4</p> <p>Does not oppose the recommendation but are concerned about the apparent presumption in the preceding discussion that the inclusion of land in the Private Forest Reserve Program should receive some degree of priority over other uses including wood production. The notification to the Private Forestry Reserve Program by Private Forests Tasmania at the time of an application for a Private Timber Reserve is an adequate manner of progressing the issue.</p> <p>Recommendation 3.5</p> <p>Supports the recommendation.</p> <p>Recommendation 3.6</p> <p>Agrees that the decision on the future access to the deep red myrtle resource in the Savage River Pipeline Corridor needs to be made sooner rather than later.</p> <p>Recommendation 4.1</p> <p>Given the need to protect landowners' rights and the unsubstantiated nature of the bulk of the perceived concerns the submitter believes the recommendations are too specific and suggest the following alternative:</p> <p>That the State as part of the five yearly review of the Forest Practices System consider amongst other issues the means to:</p> <ul style="list-style-type: none">• improve public understanding of the Forest Practices System, including the Forest Practices Code, the role of the Forest Practices Board and in particular the public and legal framework in which the Forest Practices Board operates;• formal accreditation of forest operatives regarding Forest Practices Code competencies be established;• reviewing transparency and communications regarding Forest Practices Plans taking due regard of individual landowners rights, privacy and commercial sensitivities and appropriate protection against frivolous demands that do no more than delay and frustrate the orderly processes of the industry;• reviewing the efficacy of the self regulatory aspects of the Forest Practices System in the next five year review of the Forest Practices System; and• ensuring the provision of additional funding to support the communication and research functions of the Forest Practices System. <p>Recommendation 4.2</p> <p>Expresses concern that the timeframe provided may be too constrained and urge a more relaxed approach.</p> <p>Recommendation 4.3</p> <p>Supports the recommendation.</p>



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No.	Summary
	Recommendation 4.4 To the extent that this recommendation is in accordance with the Threatened Species Strategy it is supported.
	Recommendation 4.5 It is appropriate that outstanding commitments are concluded.
	Recommendation 4.6 Supports the recommendation.
	Recommendation 4.7 The recommendation is strongly supported, however the review encapsulated by the recommendation must incorporate industry representatives and not simply the Parties to the RFA.
	Recommendation 4.8 Reserve managers outside State forests should pursue accreditation to ISO 14001.
	Recommendation 4.9 The recommendation is welcomed, however in the absence of funding assistance the recommendation is likely to only achieve limited success.
	Recommendation 4.10 The recommendation of a more fundamental review of the policy on maintaining a Permanent Forest Estate and the presupposition that it will lead to increase the levels of retention of native forest is not accepted. Is of the strong view that the current Permanent Forest Estate policy is adequate to meet its purpose and further review and increased levels of retention of native forest is not warranted. If a review of the permanent forest estate policy does go ahead it must be with the full participation of all relevant private sector stakeholders, and consider the prospect of differential levels of retention as between reserves, public land and private land. Any amendment to the Permanent Forest Estate policy must include provision for compensation to be payable in the event any private landowner is prevented through the application of the policy from harvesting forest areas for any reason. The timeframe within the recommendation is not appropriate, and that if the review does proceed, a more realistic timeframe will permit an opportunity for meaningful consultation with private sector stakeholders.
	Recommendation 4.11 Supports the recommendation.
	Recommendation 4.12 The recommendation should be amended to read: That the Forest Practices Board considers during the next review of the Forest Practices Code the issue of smoke management from forestry operations including assessing the smoke management guidelines issued by the State Fire Management Council for their applicability and suitability for adoption into the Forest Practices Code.



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No.	Summary
	<p>This recommendation is appropriate in its targeting of smoke generated by forestry activities in that it appears to permit the examination of the problem from a broader perspective through the State Fire Management Council guidelines for smoke management. This issue is broader than the role of the Forest Practices Board and therefore the State Fire Management Council is the appropriate body to provide guidelines to administer smoke management. However, it should be open for the Forest Practices Board to tailor any guidelines to suit the needs of forestry operations.</p> <p>Recommendation 4.13</p> <p>Supports the recommendation.</p> <p>Recommendation 5.1</p> <p>Welcomes this recommendation and submit that the data collection should include the same level of comprehensiveness as that compiled to measure the conservation benchmarks contained in the RFA.</p> <p>The recommendation should go further, and suggests:</p> <p>That the Parties develop a process and commit the required resources, as a priority, to obtain reliable data to inform social and economic indicators for the community, and the performance of the forest based industries relevant to Attachment 12 of the RFA. This process should be undertaken in consultation with the Forests and Forest Industry Council. The sustainability indicators relevant to the social and economic aspects of the industry need to be reviewed when such reliable data becomes available.</p> <p>Recommendation 5.2</p> <p>Welcomes the draft recommendation, in particular the proactive approach embodied within it to pursue industry development and a public education regime. However, believes that the recommendation could go further and suggests the following wording:</p> <p>That the Parties clarify the intent of Attachment 12 by 30 June 2003 and that the State prepares an industry development strategy in consultation with the Commonwealth by 30 June 2004 based on that intent. That the Parties appropriately resource and task the Forests and Forest Industry Council to develop an industry vision and an action plan to achieve it. Table 5.1 provides an incomplete list of issues that may be covered by the industry development plan. The Parties should consider the provision of appropriate resources to the Forest Education Foundation to enhance the effectiveness of their current role.</p> <p>Recommendation 6.1</p> <p>Supports the broad thrust of the recommendation, and notes that it is important that the sustainable yield reviews provide practical data on the quality of the resource being provided to the industry.</p> <p>Recommendation 6.2</p> <p>Recommendation is supported, as it is important that up to date and comprehensive information on the on going supply of special species timbers is readily available to ensure confidence and resource security.</p>



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No.	Summary
	<p>Recommendation 7.1</p> <p>Does not accept that there is any specific conflict between tourism and forestry, but do concede that from time to time specific actions or events act to provide short term conflict between the two industries.</p> <p>Agrees that a definite strategy to promote the development of forest based tourism is required. Perceives the need for an increased co-operation between the forest and tourism industries to ensure better and more sympathetic planning of activities reduces the prospect of periodic conflict.</p> <p>Recommendation 7.2</p> <p>The draft recommendation is appropriate, however it is important to note the limited nature of the submission referred to and that there is at least anecdotal information that the views presented may not accord with those of the industry as a whole.</p> <p>Endorses the right of the apiary industry to secure access to a leatherwood resource but this should not be to the exclusion of the wood production industry. The apiary industry could access leatherwood resource within the Comprehensive, Adequate and Representative reserve system.</p> <p>Recommendation 9.1</p> <p>The recommendation is appropriate and it is important that the range of sustainability indicators is as broad as possible and that economic and social indicators are enhanced.</p>
39	<p>In many places the Draft Report reads like an advertisement for the RFA and the progress that is claimed has been made since the signing.</p> <p>The numerous reported failings, omissions and breaches of the RFA by Tasmania are ignored, misrepresented and even knowingly misstated where knowledge to the contrary is surely possessed.</p> <p>Quite clear about the non-performance of the RFA and catastrophic social and environmental implications, and amazed such important issues have been glossed over.</p> <p>The Draft Report damages the submitter's confidence in the Commission to deliver and fulfil the objectives of the Resource Management and Planning System.</p> <p>The treatment of the Savage River Corridor and the Deep Red Myrtle issue by the Government and supported by the Commission's Draft Report makes a mockery of consultation.</p> <p>We do not have responsible forestry. We still have the destruction of catchment headwaters.</p> <p>The Executive Commissioner must address the current Commission audit process which the submitters consider has failed to be fair, unbiased, comprehensive, analytical, investigative, honest and just or adequate.</p> <p>Calls for a Royal Commission of Enquiry as it is the only way the conflict and inequity over the use of our forests can be properly addressed.</p> <p>Supports the call from other organisations to start the RFA review process again from the beginning with the aim of properly addressing all the issues that are brought to the attention of the Commissioners in a fair and equitable manner and the conduction of a proper, detailed audit.</p>



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No.	Summary
40	<p>The Draft Recommendations Report should be rejected on the basis that it is inadequate.</p> <p>Asks why the Report does not discuss in detail the issues involved with on-going 1080 use in forestry.</p> <p>There is no mention of the Tasmania <i>Together</i> benchmark which recommends 1080 use is phased out, nor that the chemical is under review nationally, nor that its use is publicly subsidised.</p> <p>Asks why there is no detail in the Report about how the RFA impacts on the threatened species and biodiversity of Tasmania, via the appropriate acts and strategies.</p>



Appendix 5

Summary of issues raised in written submissions to the Background Report

No.	Issues
1	<p>Problems and contradictions of the present self-regulating system:</p> <ul style="list-style-type: none"> • forest industry suffers from conflict of interest with other land uses including tourism, residential and natural heritage conservation; • is highly subjective; • corporate government and public value systems are not aligned; • exemption of Private Timber Reserves from local government planning schemes is problematic; • critical of Forest Practices System and effects of self-regulation and raises issues that can not be resolved objectively; • the Forest Practices Code serves to obstruct the democratic process of government accountability; and • there is a need for a process of mutually constructed and aligned objectives between the forest industry, council and government. <p>Logging in elevated sites:</p> <ul style="list-style-type: none"> • mountain forest has value as a major tourism attraction, conflicts with organic farming, the seafood industry based in Georges Bay and the importance of aesthetic considerations to the tourism industry and residential people; • the economic viability of steep country cable logging is questioned; • forestry poses problem to water catchment areas and tourism; and • problems of logging elevated sites can not be addressed in Forest Practices Code <p>Aesthetic considerations cannot be denied as logging coupes resemble devastated scenery. Visitors come to the Blue Tier for its scenery.</p> <p>Ecotourism and co-ordinating responsibility and returns:</p> <ul style="list-style-type: none"> • the submission points to the potential of ecotourism for the economy of North East Tasmania and proposes a mechanism for sharing the value of ecotourism around the community; and • promotes a case for conserving Blue Tier forests for ecotourism and conservation reasons.
1 Att	<p>RFA should have protected a landscape with both a richness of natural significance and a fascinating cultural mining heritage</p> <p>Critical of the non-use of the JANIS bioregional criteria in the development of the Tasmanian RFA as it has resulted in inadequate reservation for the Ben Lomond bioregion and Mt Victoria-Blue Tier area in particular.</p> <p>Raises the issue of bioregional classification status of forest communities and old growth and misclassification of status which resulted during the development of the RFA.</p> <p>Old growth of <i>Eucalyptus obliqua</i> tall forest and <i>Eucalyptus regnans</i> forest should have been reserved in their entirety in bioregion.</p>



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No.	Issues
	<p>Questions viability of reserve system in Ben Lomond bioregion and suggests that the system is not ecologically viable in the long term, given adjacent logging practice.</p> <p>Critical of the assessment of National Estate values undertaken during the development of the RFA within the bioregion and the Mt Victoria-Blue Tier area.</p> <p>Questions application of the size and minor disturbance thresholds used in assessing Natural Landscapes in assessing National Estate values and significant old growth stands.</p> <p>Questions application of the JANIS criteria.</p> <p>Geoconservation sites were considered during RFA development as being significant under a number of National Estate criteria. Many of these that occur in the Mt Victoria-Blue Tier area should have been reserved.</p> <p>Raises the management and protection of threatened fauna hot spots in the Weld and Cascade River catchment areas and other associated areas.</p> <p>Proposes a new national park to protect the values identified in the submission and would rectify significant deficiencies found in the reserve system arising from the RFA.</p> <p>Over the period of the RFA the conservation values found in the Mt Victoria-Blue Tier area and outside of reserves will be destroyed or reduced in extent with no guarantee of long-term survival.</p>
2	<p>Questions the effectiveness of the RFA in achieving the CAR Reserve system.</p> <p>Only 10% of the PRFA(sic) forest targets have been achieved to date.</p> <p>Native forest clearance over the past seven years is described as criminal.</p> <p>Concern over the loss of biodiversity from clearfelling and conversion into plantations is irreversible and that this represents a lost opportunity for ecotourism.</p> <p>Supports the points contained in an article by Rob Fairlie of the Forest Action Network.</p> <p>The RFA's credibility is questionable.</p> <p>Lack of agreement among community groups to the consultation phase of the RFA and uptake of their views or advice in finalising the RFA.</p> <p>Financial donations to major Parties when the RFA was signed.</p> <p>RFA failed to meet protection levels in that reservation levels for 29 of the 50 forest communities were short of the RFA criteria.</p> <p>Overstating the extent of reservation by including narrow corridors which are not ecologically viable.</p> <p>Counting informal reserves available for mining toward wilderness protection, thereby overstating the area of wilderness protected by 330,000 ha.</p> <p>Misapplication of wilderness delineation process resulting in a failure to identify an additional 200,000 ha of wilderness.</p> <p>Failure to apply reserve criteria on a bioregional basis resulting in a reduction in the proposed reserves of 50,000 ha.</p> <p>Removal of only 39,000 ha of forest from logging while adding 40,000 ha.</p> <p>Economic and social analysis failed to consider alternative wealth creation alternatives.</p>



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No.	Issues
3	<p>Positive picture of future of Tasmania's forest industry.</p> <p>Management of wet forest old growth CAR values now in reserves. Values will be lost through succession into rainforest. Raises issue of eucalypt replacement in wet forests as old eucalypts die.</p> <p>The RFA gives some comfort to industry that there will not be further resource withdrawal.</p> <p>Over reservation of old growth forests will result in the loss of these eucalypts.</p> <p>Wet forest eucalypts are the most productive and the reserve system has severely depleted the high quality resource for sawlog and veneer industries.</p> <p>Presented figures on the rate of old growth logging as a percentage of old growth forest available for logging and wet old growth forest available for logging. It is argued that these rates are reasonable and necessary.</p>
4	<p>Very concerned that social and economic benefits of the RFA are understated.</p> <p>Critical of ABS and ABARE employment figures and believes these do not provide a full picture of employment in forest sector. The employment figures do not accurately reflect those involved in the forest and timber industry. The Sustainability Indicators report does not take into account those involved in forest product transport. A large fleet of trucks move logs from harvesting areas to processing sites and other transport depots. A conservative estimate of this fleet would be in the range of 360-400 trucks. This would mean another 500 employees. Associated with these trucks are mechanics, fleet managers, supervisors, inspectors, administration, and clerical staff.</p> <p>In addition, a percentage of employees of Tas Rail's business can be attributed to the timber industry.</p> <p>To exclude the employment of transport workers from employment figures generated by forestry understates the employment consequences of security provided by the RFA.</p> <p>Social and economic value of the road system provided by the forestry sector appears not to be stated. Over 3,900 km of road has been constructed and is maintained by Forestry Tasmania on State Forests. This provides a major benefit to the tourism sector through the provision of access. The road network creates significant employment in its construction and maintenance. The road network is vital in combating wildfire and providing emergency access.</p> <p>The forest industry also makes a substantial contribution to the State by way of motor taxes (in 1998/99 over \$142 million). The report ignores this contribution.</p> <p>When shipping agents, tug companies, accountants and the like are added to the extensive list above, the State does well out of this important resource.</p> <p>The RPDC should ensure that these social and economic impacts are included in this current inquiry and the collection of these figures should be part of the data to be used in subsequent 5-yearly reviews.</p>
5	<p>The RFA is a massive undertaking to achieve a balance in forest management. It establishes a CAR reserve system and a sound basis for sustainable timber harvesting.</p> <p>Background Report clearly demonstrates the RFA is successful in achieving environmental objectives and balance between timber harvesting and forest reservation.</p>



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No.	Issues
	<p>Not enough is done to educate the public or counter criticism on forest issues – this was a key commitment of the RFA. Cites several examples of misinformation provided by others.</p> <p>Governments should provide correct facts and figures to help prevent misinformation and help discredit claims. Governments must continually publish facts about forest management.</p> <p>Forest Education Foundation needs more government support and it or another body given an extended role in educating the public. Public will not read the Background Report so needs summaries of key issues and figures.</p> <p>Lack of public education has hindered new forest industry developments since the RFA.</p>
6	<p>The RFA has resulted in increased woodchip production, much more native forest being converted to plantation, and a loss of jobs in forest industries.</p> <p>Woodchipping old growth forest is dumb economics. Comments on low returns from woodchips. Supports further downstream processing.</p> <p>The success of the AirWalk shows the benefit of forest-based tourism. The effects of clearfelling on the tourists' perceptions and return rate should be taken into account.</p> <p>Old growth logging must be ended as per the Tasmania <i>Together</i> targets. Congratulatory about seeking public views but critical about how it is being ignored.</p> <p>Tasmania should focus on selective logging of native forest and conversion of the timbers to higher value products than woodchips – it should be a sawmill and craftsperson driven industry, perhaps regulated by a government authority.</p> <p>Tasmania needs to take a long-term view on logging and forests. Is sceptical about scientific conclusions produced by industry scientists and working on data from far fewer years than it takes a forest to reach maturity.</p> <p>Scrap the RFA and pay out the companies.</p>
7	<p>Does not agree with clearfelling forests in the Styx, North East Highlands, South West wilderness and the Tarkine. Concerned about what is happening to old growth forests. Have a duty to future generations.</p> <p>Views clearfelling and burning and use of 1080 as terrible practice.</p> <p>Low returns from woodchipping old growth and waste associated with burning speciality timbers a disgrace.</p> <p>Clear felling old growth forests and replacing them with plantations is not sustainable.</p> <p>Does not mind selective logging in Tasmania of speciality timbers in old growth forests. Craftsmen can't get enough supply to meet demand.</p> <p>Considers the RFA should be scrapped as it has failed to protect old growth forests and wilderness; has accelerated clearing of Tasmania's native forests; resulted in less downstream processing and fewer jobs in our forests and record levels of woodchipping.</p>
8	<p>As a tour operator, is frustrated by the lack of will to address forestry management issues in Tasmania.</p> <p>International visitors come to see Tasmania's landscapes and wildlife but are dismayed by degradation of our environment.</p>



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No.	Issues
	<p>Believes that current management planning is not appropriately balancing forestry, logging and tourism in terms of tourism assets. States that Tasmania is being dramatically modified at an alarming rate, without meaningful consultation or consideration of the long term impacts forestry and logging have on the tourism industry in Tasmania.</p> <p>Old growth forest issues in particular, are no longer just an environmental issue; it is a profound moral issue that confronts all Tasmanians.</p> <p>Current forest practices are destroying Tasmania's natural assets. Wishes clearfelling practices to be curbed and more funds provided for tourism. Tourism is a sustainable industry, forestry and logging are not.</p>
9	<p>Would like further indicators on:</p> <ul style="list-style-type: none"> • habitat for migration purposes; • habitat for genetic migration; • weed invasion extents; • soil creation and removal rates compared; • change in forestry logging techniques from clearfell to selective; and • amount of timber removed for each sector (paper, chip, craft) and an average \$ per tonne and associated revenue for the State. <p>The creation of island ecosystems should be avoided due to the risks to reserves from edge effects and genetic inbreeding.</p> <p>Agrees with ending logging of old growth timber.</p>
10	<p>Consider the RFA has been a disaster as it has failed to protect old growth forest in areas such as the Styx Valley and the Tarkine.</p> <p>30% of wilderness areas remain under threat and a lot of wilderness is not forest.</p> <p>Concerned over lack of information on Tasmanian woodchip production and prices received by Forestry Tasmania.</p> <p>Indications are that RFA has accelerated clearing of our native forests yet resulted in less downstream processing and fewer jobs in the forests.</p> <p>Comments on ABS employment figures and decline in employment. Links closure of Burnie pulp mill to RFA with 280 jobs lost while whole logs and woodchips are exported from that wharf.</p> <p>Forestry Tasmania has ignored the community's wishes to stop logging in old growth forests and woodchipping expressed through the Tasmania <i>Together</i> process.</p>
11	<p>Considers the continued destruction of old growth forest is no longer an environmental issue but a moral one, and likens the growing change in public opinion on this issue to that experienced during the whaling debate. Requests stopping the destruction of old growth forests.</p>
12	<p>Opposes logging of old growth forests.</p> <p>Requests a review of current logging practices and that options be looked at now for stopping old growth logging as jobs will inevitably be lost when the old growth runs out.</p>



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No.	Issues
13	<p>Requests RPDC to review why is only 35% of State forest set aside for selective logging and the rest for woodchips?</p> <p>Clear felling does not encourage harvesting of speciality timbers, destroys habitat, causes soil erosion and subsequent water pollution</p> <p>Forest Practices Code seen to be ineffective as good logs are split so they are no longer suitable for milling.</p> <p>Why is the volume of woodchips produced and the price paid by Gunns secret?</p> <p>Consideration should be given to abandoning the RFA.</p>
14	<p>Opposes the RFA because of logging of giant eucalypts for woodchips.</p> <p>Requests an end to clearfelling as soon as possible, and for a variety of gums to be planted instead of plantation trees to supply exotic timbers for the craft industry.</p>
15	<p>Stop clearfelling of native forests due to scenic and spiritual values.</p>
16	<p>RFA promotes destructive harvesting practice particularly clearfelling.</p> <p>Critical of forest product utilisation policy – wastage of sawlog and special species timbers that could be used in value adding.</p> <p>Critical about current practices and forest destruction (linkage to habitat, soils, biomass issues, smoke pollution).</p> <p>Environmental monitoring reveals loss in biotic abundance and diversity.</p> <p>Critical of how Forest Practices Code breaches are addressed.</p> <p>Critical of policy of converting native forest to plantations – opportunity cost, environmental impact and loss of native forest.</p> <p>Critical of policy of intensifying fibre production on public forests at the expense of other timber values.</p> <p>Wants to see multiple-use and sustainable forestry actually practiced for a range of benefits, limiting impacts of harvesting and promotion and realisation of full range of timber and other values.</p>
17	<p>Place old growth into reserve system.</p> <p>Critical of policy of exporting woodchips.</p> <p>Critical of policy of converting native forest to plantations.</p>
18	<p>Stop clearfelling of old growth native forests by 2010.</p> <p>Reservation level of <i>E. regnans</i> old growth too low.</p> <p>Conserve old growth forest (reference to WA and Vic).</p> <p>Supports Tasmania <i>Together</i>.</p> <p>Make better use of forests to employ people.</p> <p>Move industry to a plantation base.</p>



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No.	Issues
	<p>Critical of uptake by forest industry in value adding and product utilisation policy – utilisation wastage of sawlog and special species timbers that could be used in value adding, onus on woodchips rather than other timber products. Provides view that industry wants to utilise waste wood.</p> <p>Critical of financial return and pricing of woodchips.</p> <p>Raises the issue of balance between forestry operations and leatherwood honey, furniture, boat-building and tourism industries.</p> <p>Seeks increased promotion and development of nature-based tourism industry.</p> <p>Critical about current practice of using 1080.</p> <p>Raises threatened fauna species issues (wedge-tailed eagle, masked owl, azure kingfisher and spotted-tailed quoll).</p> <p>Community groups showing numerous breaches of Forest Practices Code. Should improve policing and implementation of code.</p> <p>Need to review forest industry.</p>
19	<p>Stop clearfelling of native forests.</p> <p>Selective logging makes better economic and ecological sense.</p> <p>Conserve old growth forest.</p> <p>Promote Tasmanian clean green image.</p>
20	<p>Stop conversion of native forests to plantations.</p> <p>Conserve old growth forests.</p> <p>Make better use of forests to employ people, stop woodchipping.</p> <p>Current practice and royalty is a subsidy to industry.</p>
21	<p>Stop clearfelling of native forests.</p> <p>Smoke pollution from clearfelling burn offs is unacceptable.</p>
22	<p>Overall very poor output and outcome in terms of Employment and Industry Development Strategy.</p> <p>Poor outcome in terms of downstream processing, investment, value adding and job creation.</p> <p>Since RFA export woodchip production increased while sawlog production decreased from public land. Decrease in jobs by 1240.</p> <p>Requests critical analysis of factors leading to failure in delivery of Employment and Industry Development Strategy.</p> <p>Long term sustainable supply of Tasmanian native forest timbers essential for underpinning locally based downstream processing (boat building, sawmilling, craft, furniture making and shingles).</p> <p>Serious concerns about the future availability of quality speciality timbers from the State's timber production zones with supplies running out in 12 years.</p> <p>Critical about current practice and significant waste particularly in special timber species.</p>



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No.	Issues
	<p>Timber harvested from old growth chipped regardless of quality.</p> <p>General comment on sustainability of harvesting practice in old growth and need to maintain local ecological values and potential for continual harvest of forest products from areas in perpetuity.</p> <p>ISO 14001 accreditation will not meet international certification requirements.</p>
22 Att 1	<p>Questions industry employment figures in background report. Believes that less than 8000 are in Tasmanian industry.</p> <p>Need to redefine Tasmanian industry to improve current and future social and economic benefits. Claims 26% timber removed while remainder burnt from coupes (see submitter's Attachment 2).</p> <p>Questions that clearfelling practice results in the best use of timbers that the coupe contains.</p> <p>Current strategy reducing the flexibility and range in forest-based employment and industry both now and for all future generations.</p> <p>Argues that the Ecologically Sustainable Forest Management requirement for the development of internationally competitive forest products industries which are economically sustainable and provide for social and economic benefits to Tasmanians now and in the future are not being optimised nor met.</p> <p>Believes current forest management strategy could impact on the Tasmanian tourism brand.</p> <p>Questions the rationale for converting 15,000 ha/annum of native forest to plantations.</p> <p>Questions the rationale for rotations of 90 years outside of Special Timber Management Units (Appendix 1) which will ultimately confine the utilisation of these species to these Units within the period of the RFA.</p> <p>Timber industry is providing fewer local opportunities and the statistical trends are indicating reduced local community and job benefits. Current strategy is leading to an emphasis on low value woodchips and job minimisation.</p> <p>Need to ensure that future generations have the same choices as we have (ecological, community, and timber resource values) – concept of sustainable yield. Current strategy is robbing opportunity from future generations.</p> <p>Conversion of Southern Forest mature mixed wet forest to eucalypt regrowth or plantations will give future Tasmanians poorer quality eucalypts and greatly reduced access to world class special species.</p> <p>It is naïve and short-sighted to assume Tasmania's future in forestry lies in maximising the volume of pulpwood and second grade sawlogs to the direct disadvantage of smaller volume but higher value timber product.</p> <p>Tasmania should position itself as a world leader in quality timber and not in eucalypt regrowth and plantations.</p> <p>Given its fine timbers it is unacceptable for Tasmania not to be able to support a viable wealthy and innovative industry.</p> <p>The RFA promised job security, stability and opportunity but has not delivered.</p>



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No.	Issues
	<p>Industry's current focus on clearfelling and expanded woodchip production cannot be changed for employment and social reasons. Argues that the sustainability indicators and statistics demonstrate that present strategy is compromising jobs, quality of native forests and future access to timber resources such that it is a lose-lose situation for Tasmania.</p> <p>Argues that the decline in sawmilling is a result of present over cutting, clearfelling and dominance of woodchipping.</p> <p>Distinction between sawlog and chip logs depends upon market and as a result sawlogs are being chipped. Regrowth is being chipped when in the future these logs would become sawlogs.</p> <p>Comments that presently woodchip jobs total 362 jobs for 90% of forest product harvested and there are 325 jobs associated with old growth logging.</p> <p>Argues that most of the timber harvested in Tasmania is processed offshore. Hence the current structure of the Tasmanian and Australian forest industries is contributing to a significant social and economic deficit at both a State and national level.</p> <p>Highlights current risk that Tasmanian forest products will attract negative publicity and international label as a result of current policies and strategies.</p> <p>Resource security is non-existent for small saw millers and crafts people hence reluctant to invest.</p> <p>Critical of state policy of accepting lower royalty and exporting ever larger volumes of woodchips at the expense of specialist small timber businesses.</p> <p>Calls for a resource audit of Special Timber Management Units and remaining old growth to look at yield of special timbers. Questions long-term future of these timbers.</p> <p>Highlights impact to industries of disappearance of native mixed forests including speciality timbers, apiary, native oils, medicinal plants and tourism.</p> <p>Questions Southwood proposal and refers to sustainability in terms of <i>Land Use Planning and Approvals Act</i> (Tas.).</p> <p>States that Tasmania is refusing to recognise their natural advantage and unique resources – better use and care of timber resources endowed.</p> <p>Raises log handling in bush and because of lack of care more timber ends up as chips.</p> <p>For optimum quality eucalypt sawlogs use 120 year rotations.</p> <p>92% timber felled is chipped. Calls for greatly improved utilisation to obtain timber 5-10 times the price of chips – will generate wealth and jobs.</p> <p>Need to develop furniture industry based on native timbers not plantations. Maintains that old growth mature timber is stronger, more stable, richer in colour more attractive than regrowth product under current regime.</p> <p>Craftwood worth \$20 million per annum. Worried that current management regime will tarnish brand.</p> <p>Need to develop wooden boat building industry based on planned scheduling of high-quality, valuable fine-timber useful for boats and furniture.</p>



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No.	Issues
	<p>Critical that woodchipping is driving the forest industry and solid wood products are the losers. States that woodchip industry is self regulating and promotes adverse impact on social well being of Tasmanians.</p> <p>Need to develop industry to local value adding and downstream processing using smaller volumes of world class timber.</p> <p>Need to promote alternative native forest options that foster long-term growth in industry and sustains the environment.</p> <p>Calls for a moratorium on clearfelling old growth and mature regrowth (identifies areas) so that alternative silvicultural and low-impact systems are implemented and planned for securing a broad-based viable industry in the long term.</p> <p>If a truly sustainable yield was achieved for Tasmanian forests it would lead to certification by Forest Stewardship Council.</p> <p>Comments on Australian Forest Standard as labelling clearfelling of old growth practice and ISO 14001 accreditation as validating clearfelling, burning speciality timbers, killing native species with 1080 and establishing plantations for pulp.</p> <p>Comments that Forestry Tasmania claims that systems are leading to improvements in sustainable forest management with the qualifier of ecologically being increasingly absent.</p> <p>Calls for governments to help develop niche markets and alternative industries to that of woodchips and help seek Forest Stewardship Council certification. Tie logging and ecotourism industries together.</p> <p>Change to industry and Attachment 12 needs to be made soon so that Tasmania does not go the way of mainland states. Need to move industry and have a fundamental shift in forest management away from large clearfell and burning practice.</p> <p>Need to develop southern forests as multiple use forests.</p> <p>Calls on government to implement changes to create a sustainable future for all timber users and forest communities.</p> <p>Requests development of a blueprint for a sensible, safe and inclusive future forest management regime involving managers, governments and stakeholders.</p>
22 Att 2	<p>Completed study of amount of timber product removed during harvesting of old growth forest and material remaining as waste.</p> <p>Asks why alternative silviculture regimes and long rotation periods are not applied.</p> <p>Calls for an independent assessment of operations to ensure logging efficiency maximised, minimising wastage of valuable timber and practices are ecologically sustainable.</p> <p>Calls for market agreements to be in place for each piece of timber before logging goes ahead thereby minimising waste and maximise benefits.</p> <p>Calls for a moratorium on the practice of clearfelling old growth until more suitable approaches are developed.</p> <p>Clearfelling and burning tarnishes Tasmania's reputation in tourism.</p> <p>Raises health issues associated with smoke pollution from regeneration burning.</p> <p>Provides documentation to question actual verses expected yield from coupe.</p>



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No.	Issues
	<p>Raises issues about commercial wood being defined as having a current market agreement and penalties being applied over 5 cu. metres of commercial wood per hectare.</p> <p>States that current practice in a coupe does not enable optimum salvage harvesting and utilisation of timber products. Provides commentary about how to improve practice. Raises log grading standards and responsibility.</p> <p>Comment on the concept of sustainable yield, what is being sustained and the management of special species timbers.</p> <p>Questions utilisation standards, issues of commercial and 'un-commercial' wood, marketing practice.</p>
23	<p>States that new information indicates that harvesting regimes applied to old growth through clearfelling are changing the basic forest ecology and meteorology, increasing risk of fires and reducing water quantity.</p> <p>States that special species timbers is on an unsustainable supply regime given inaccessibility constraints in Special Timber Management Unit, no inventory or audit of special species to determine scheduling over the next 400 years, conversion of mixed eucalypt forest to eucalypt plantations/regrowth and current wastage on clearfell sites.</p> <p>Need to manage old growth forests to yield a sustainable supply of all timber species without lowering timber quality forever.</p> <p>Governments should promote and enhance growth and development of Tasmania's future industries and provide certainty of resource access.</p> <p>Critical of transparency and independence of Forest Practices Board in relation to Attachment 10.9.</p> <p>States that Code requires planting mixes to represent natural mixes of the former forest and that regeneration method favours eucalypt rather than special species timbers (Attachment 9.10). Infers that stocking standards need to cover regeneration of speciality timbers as well as eucalypt and be reported through Sustainability Indicator 2.1.g.</p> <p>Sustainable yield reviews required to include special species timbers particularly Celery Top Pine.</p> <p>Tasmanian furniture has been refused exhibition because of poor forest management practice.</p> <p>Inadequate zoning, planning and management to provide for long-term sustainable production of special species timbers in accordance with Attachment 10.6 and 12.27.</p> <p>All remaining old growth production forests should be placed into Special Timber Management Units and managed in perpetuity for sustainable supplies of unique, beautiful world-class special species timber and mature eucalypt.</p> <p>Cites scientific study of coupe EP074D (discussed in Submission 22) and that 74% of standing timber volume was left to be burnt – much of it special species timber.</p> <p>Critical of the lack of implementation of flexible silvicultural systems to promote the sustainable production of long rotation speciality timbers and calls for changes to silvicultural strategies applying to forests that are suitable for special timbers.</p>
24	<p>Release hardwood woodchip figures (volume and value).</p> <p>Release prices for woodchips.</p>



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No.	Issues
	<p>Old growth target not being met for main timber species of tall old growth.</p> <p>Conversion of tall old growth to plantations.</p> <p>Conversion of native forests to plantations.</p> <p>Destruction of speciality timber resource.</p> <p>Destruction of wilderness scenery and landscape value for tourism.</p> <p>Concern over forestry and domestic water supply.</p> <p>Disregard for proposals of Tasmania <i>Together</i>.</p> <p>Issue of extension of Wilderness World Heritage Area, Styx, Northern Highlands, Eastern and Western Tiers.</p> <p>RFA contributed to decrease in employment in wood and paper products industry; the RFA has not created employment.</p> <p>Using woodchips in Tasmania rather than exporting.</p> <p>Consideration of Tarkine wilderness.</p>
25	<p>The 60% old growth target has not been met for the main species of tall old growth.</p> <p>Only 25% of Tasmania's original old growth forests remain.</p> <p>Concerned about accelerated clearfelling in native forests. Over 63% of logging consists of clearfelling and burning. Forestry claims this is necessary to grow back native forests, however, 68% of native forests clearfelled are replaced by plantations.</p> <p>Conversion of native forests to plantations destroys habitat, rainforest species, specialty timbers, water supplies and scenery for our vital tourism industry.</p> <p>Fewer jobs have resulted from the RFA. ABS figures show that jobs in the wood and paper products industries in Tasmania have decreased.</p> <p>The RFA goes against the Tasmania <i>Together</i> process.</p> <p>Recommends an end to the RFA and to old growth logging.</p>
26	<p>Preservation of old growth forests essential to human well-being now and into the future – together with environmentally friendly public policies and cessation of woodchipping and burning, can assist in enhancing life, ensuring clean air and a reduction in greenhouse gas emissions.</p> <p>The RFA must be revoked and replaced by sustainable and life enhancing policies.</p>
27	<p>Protests at the mass destruction of old growth forests. Logging of old growth forests should be stopped and these forests should receive serious protection status.</p> <p>Deceitful to label the burning of 300,000 tonnes of forest per year as green or renewable.</p>
28	<p>The paper and timber industry in Burnie employed almost 4,000. Today it employs one-tenth that number. At the same time, millions of tonnes of woodchips and timber are exported from Burnie for value adding by other nations. The local timber and paper industry is dying.</p> <p>The intent of the RFA has been distorted by political double speak and timber industry advocates. The RFA seems to give licence to big companies to accelerate the destruction of Tasmanian heritage with minimal benefits to Tasmanians.</p>



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No.	Issues
	<p>Concerned that Tasmania's landscape may not continue to be a big tourist drawcard for much longer with the continued destruction of forests.</p> <p>Forestry Tasmania is not a viable operation – it is heavily subsidised by the taxpayer while giving our timber away at ridiculously small prices.</p> <p>Does not support the clearfelling of old growth.</p> <p>The RFA has not fulfilled its promise either due to poor drafting or lack of good will – it should be revoked.</p>
29	<p>The RFA does not properly protect old growth forest in areas such as the Styx Valley, the Tarkine, the North East Highlands and the Southwest wilderness areas.</p> <p>The RFA does not result in Ecologically Sustainable Forest Management when public forests are clearfelled, burned and then mostly replaced by plantations.</p> <p>The RFA has caused more job losses in the timber industry with the closure of the Burnie pulp mill.</p> <p>Forestry Tasmania has planned clearfelling for years to come in areas proposed for protection under the Tasmania <i>Together</i> process.</p> <p>Leave all old growth forests alone completely.</p> <p>Manage what has already been destroyed up to now properly and use it well with plantations and re-growth to support the timber industry.</p>
30	<p>The magnificence of the forests holds more for humans than woodchips and a good financial bottom line for Government and forestry.</p> <p>Maintain the old forests. Prevent them (old growth) from being sold off to the lowest bidder for chips.</p>
31	<p>In North East Tasmania there is no evidence of any change in the logging industries attitude of approach to clearfelling of forests, given the guidelines set down in the RFA.</p> <p>The RFA is not working to preserve our heritage.</p> <p>Mainlanders and overseas visitors come to Tasmania because of its unspoiled beauty.</p> <p>Don't allow old growth logging under any circumstances. Timber industry should consider other options.</p>
32	<p>Concerned about continued destruction of old growth forest. Calls for a halt to clearfelling old growth forests immediately.</p> <p>Clearfelling and burning of old growth has resulted in 68% of these forests being replaced by monoculture plantations with consequent impacts on habitat, rainforest species, specialty timbers, water supplies and a sustainable saw logging industry.</p> <p>Concerned about replacing wilderness areas with plantations, diminishing the value of local environmental assets as well as cultural and tourism industries.</p> <p>The RFA is at odds with the Tasmania <i>Together</i> process.</p> <p>Change the RFA to ensure old forests are not clearfelled but managed holistically for the appreciation of future generations.</p>



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No.	Issues
33	<p>The RFA is fundamentally flawed because it has resulted in record levels of woodchipping and forest destruction for high volume low value exports. Concern for long term good for Tasmania and employment.</p> <p>Failure to introduce land clearing controls has led to the loss of important areas for conservation.</p> <p>The claim that 86% of the old growth estate is in reserves fails to recognise that only 18% of the original tall old growth forest remains and only 40% of this area is inside proper reserves.</p> <p>Claims that 95% of wilderness is reserved is dismissed as evidence of forest clearing outside reserves.</p> <p>RFA has accelerated clearing of native forests. 68% of native forest are replaced by plantations and this is unsustainable.</p> <p>Through plantation conversion we are losing wildlife habitat, speciality timbers, domestic water supplies, eucalypt sawlogs and tourist assets.</p> <p>Since 1990 4000 jobs have gone.</p> <p>Time to end clearfelling and transit to a sustainable forest industry.</p> <p>Attachments relating to the Findhorn Declaration and Call to Action.</p>
34	<p>JANIS criteria were not met in the RFA.</p> <p>Voluntary conservation measures on private land are inadequate. Private CAR reserve program too slow and funding inadequate. Land clearing legislation is required and is a RFA commitment not met.</p> <p>Threatened Species Strategy, Threatened Species Act and threatened species management institutional arrangements are inadequate on both private and public land. The number of threatened species has increased since RFA. More species should be listed (Eastern grey kangaroo and spotted-tailed quoll). More positive action required. DPIWE is too weak to ensure threatened species are adequately protected.</p> <p>There is insufficient funding for management of CAR reserves, leading to degradation of values.</p> <p>Current forestry practices are unsustainable because they are market driven with an emphasis on industrial forestry.</p> <p>Proposed cut of deep red myrtle based on the review is unsustainable. Much of this resource has been squandered.</p> <p>Forest Practices System is viewed with much dissatisfaction. Water catchments, ecosystems and human health are not adequately protected by the Code. The regulatory system is not independent. Forest Practices Plans do not come under the Resource Management and Planning System. The industry is not accountable to anyone.</p> <p>RFA funding gives industry an advantage but Forestry Tasmania profits are low compared to Gunns.</p> <p>Opinion polls show consistently that Tasmanians feel old growth logging should cease.</p> <p>Access to State forests should not be guaranteed with compensation.</p>



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No.	Issues
	<p>Opposes resource security for forestry and security for mining industry access to reserves. Mining provides dubious economic benefit to Tasmania and pollutes waterways.</p> <p>Many reserves are inadequate to protect biodiversity values. IUCN recommended levels of reservation are conservative. All old growth forest should be reserved and their logging ceased. All logging of native forest should be phased out by 2017.</p> <p>Tasmania's forests have been logged unsustainably for decades; especially worse on private land. Lack of a sustainable yield strategy and measurements of regeneration success on private land is a problem as is lack of sustainable yield for plantations and tree fern harvesting data.</p> <p>Questions lack of mention of Mundulla yellows and high altitude dieback of eucalypts as new health problems to be reported.</p> <p>Statements that impacts on soil erosion from forestry operations are effectively managed are misleading because of inadequacies in code.</p> <p>The carbon biomass estimates provided are dishonest and shows forest managers cannot be trusted.</p> <p>Woodchip volumes have increased exponentially since the RFA was signed – this is not explained. Notes that these data are no longer publicly available.</p> <p>Large amounts of public money has been channelled into a few projects like the AirWalk at the expense of funding for tourism in National Parks and other reserves. Management of parks is at an all-time low. Large areas of forested wilderness are unprotected and much wilderness does not contain forest ecosystems. Walking track management in wilderness areas is abysmal. More wilderness areas should be made available to tourists.</p> <p>More areas need to be set aside for cultural heritage and Aboriginal ownership. Forestry reduces spiritual values.</p> <p>Employment in the industry has decreased and will continue to decrease. Jobs in beekeeping, furniture, craftwood and small sawmilling are at risk.</p> <p>Forest practices should be within the Resource Management and Planning System and allow for third party appeals rights. The Forest Practices Board needs to be overhauled with independent experts appointed.</p> <p>Employment of indigenous people in forest and reserve management is not good enough.</p>
35	<p>Objects to the RFA on the basis that the destruction of old growth forest is fundamentally wrong and completely unnecessary in a first world economy.</p> <p>The RFA has failed to protect wilderness and has accelerated clearing of native forest.</p> <p>Unacceptable for forests to be woodchipped and sent overseas.</p>
36	<p>Expresses dissatisfaction with the RFA because of conversion of old growth to plantations.</p> <p>Has lost faith in the RFA, Forestry Tasmania and Forest Practices Board.</p> <p>Is concerned about effect on species habitat, integrity of the old growth forest and landscape values.</p> <p>The RFA has had a negative effect on Tasmania's clean green image and tourism values.</p> <p>The RFA has seen poor environmental practices – clearfelling on steep slopes resulting in soil erosion.</p>



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No.	Issues
	The RFA is reducing majestic trees to woodchips for a pittance.
37	Seeks an end to old growth logging and the scrapping of the RFA.
38	<p>Expresses concern for the lack of legal protection for threatened plant communities and advocates protection of those threatened plant communities identified by CARSAG under the <i>Threatened Species Protection Act 1995</i>. Also recommended that there be better communication of the CARSAG Report 2000 through government.</p> <p>Questions the continuation of old growth logging as economic lunacy.</p> <p>Draws attention to the conflict between the Tasmania <i>Together</i> milestone to stop clearfelling of old growth forest in key areas of Tasmania and the logging plans of Forestry Tasmania.</p>
39	Calls for an end to old growth forest logging.
40	<p>Considerable alarm in the community about accelerated rate of native forest clearing post-RFA. Unprecedented effects on other values and interests on Tasman and Forestier Peninsulas.</p> <p>Tourism is the single greatest employer in the Tasman region. No other coastal community in the State has been so negatively impacted upon by the forest industry. Skyline breaches and spoiled vistas are in abundance and increasing. Eco-tourists get better value in other areas such as Freycinet (a major competitor) where there are no impacts from logging.</p> <p>Employment in industry is declining compared to tourism. The forest industry provides little employment in the Tasman region, yet extracts a large and increasing resource which is detrimental to the Tasman community.</p> <p>The objectives, principles and operations of the forest industry are at direct odds with those of other land tenures.</p> <p>Log trucks operate 24 hours a day. Public roads in State forest are poorly maintained.</p> <p>State forest exemption from laws such as <i>Environmental Protection and Biodiversity Conservation Act</i> and threatened species and water management is deplorable and highlights the industry's unsustainability.</p> <p>The failure to include water in the RFA undermines its 20 year vision – profound implications for Tasman community – in particular, the opening up of the strategically important groundwater catchment to logging. Special Management Zoning has not been implemented.</p> <p>The RFA permits clearfelling of catchment forests, plantation establishment and the introduction of pesticides, fertilisers and herbicides into community drinking water.</p> <p>State Forests should be managed on a catchment basis as opposed to a coupe basis.</p> <p>The Forest Practices Code is weak and open to too much interpretation. Increase in logging activity has not resulted in a commensurate increase in policing of the Code. Its policing by industry has led to a number of breaches. These breaches have been reported by concerned citizens, not forest practices officers – how many more breaches go unreported?</p> <p>Bitter disappointment at RFAs facilitation of industry white-anting native forest infrastructure. Bad science, politics and clever semantics have distorted values leading to a loss of community confidence.</p>



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No.	Issues
41	Concern is expressed as to the rate of destruction of (old growth) forests for conversion to woodchips. The Tasmanian population and timber workers in particular don't benefit because mechanisation has resulted in loss of jobs, the tourism industry will suffer because of the establishment of pine plantations and small landowners will suffer because of use of 1080 poison.
42	<p>Strongly supports the RFA. Lost resource arising from the agreement will be compensated for by having a twenty year agreement.</p> <p>Notes that improved knowledge base for threatened species is a direct result of forestry research and planning.</p> <p>Recommends more work on social and economic outcomes.</p> <p>Asserts that delays in the passage of Federal legislation caused the industry to defer downstream processing investment.</p> <p>Seeks detailed analysis of the outcomes of the RFA for regional and remote communities.</p>
43	Expresses concern that the RFA has caused record levels of woodchipping and forest destruction and calls for a halt to these destructive practices.
44	<p>Expresses concern with the accelerated clearing of native forests under the RFA.</p> <p>68% of clear felled native forests are converted to plantations with resultant loss of and sustainability of native forest values.</p> <p>Expresses concern with depopulation of rural areas being caused by forestry.</p> <p>Expresses concern with lack of respect for historic places like Blue Tier.</p>
45	<p>The State and Commonwealth governments can be well satisfied with this report card. In almost every case the implementation milestones have been met.</p> <p>The RFA provided a reserve system based on scientific attributes that exceeds international standards. This is balanced by legislated security of access to resource.</p> <p>Indicator 1.2.b, 'The status of Species at Risk,' states that this indicator is a measure of management effectiveness. A simple recording of an increase in numbers is not the nub of the matter. Changes in status have been a result of better knowledge. RFA investigations improved our knowledge base, leading to more identifications but also better plans for threat abatement and recovery management. Management effectiveness is the issue.</p> <p>Need to establish balance. Fresh assessment to refine Montreal Indicators is warranted in the next review period. Natural heritage issues receive much greater accent than social and economic issues. The latter are dealt with through the development of only one indicator family. It is unfortunate that the RFA did not include continuation of the work of Dr Coakes re social and economic assessment. Dr Coakes' approach should be extended as part of the next 5 year period. Social sustainability is just as much an issue as conservation or harvest sustainability.</p> <p>The submitter funds and administers research and other projects to make sawmilling and veneer industries less reliant on old growth feedstock. The projects outlined in Attachment 12 generally complement action being followed prior to the RFA.</p> <p>The Commonwealth undertook various commitments in Attachment 12 but the reports of outcomes do not appear to have been included in the Background Report.</p>



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No.	Issues
	<p>Expect the Commission to request updates on the progress of the Commonwealth in encouraging the use of Crown Cut veneer. To date, the submitter has borne the cost of this marketing.</p> <p>Place on record undertakings given in clauses 20 and 21 of Attachment 12 about provision of Forest Industry Structural Adjustment Program funds. Realisation of this commitment through funding for sawmilling industry redevelopment should be an issue in the next 5-year RFA term.</p> <p>Clause 9 Attachment 12 is explicit about the Commonwealth funding a dedicated Forest Industries Client Manager – however, funding expired in 1999.</p> <p>Progress on the tasks identified in clause 18 of Attachment 12 has been reported on by the State. How has the Commonwealth contributed?</p>
46	<p>Details the charter of the submitter and the wide scope of its forest industry members.</p> <p>Notes the scope of the review as a review of progress with implementation of the RFA and in particular that it does not provide for renegotiation of the RFA.</p> <p>Notes the historical underpinnings of the RFA in the National Forest Policy Statement and the Tasmanian Forests and Forest Industry Strategy and the need for balance in the competing economic, social and environmental considerations.</p> <p>In general the implementation process has proceeded on time and in line with the intentions of the Parties.</p> <p>Expresses concern with the delay in the Commonwealth legislation, but concedes that the relevant milestone was met, and considers that the delay has restricted much of the intended employment and industry development.</p> <p>Asserts that the establishment of the CAR reserve system has resulted in poorer quality sawlog supply and loss of industry confidence</p> <p>Expresses concern that the sustainability indicators relating to social and economic factors lack the same ‘concentration and breadth’ of the environmental indicators and recommends that ABARE be tasked with establishing and maintaining a comprehensive range of data to measure employment and industry.</p> <p>Development of wood based industries has not progressed as expected because of</p> <ol style="list-style-type: none"> major industry restructure involving a change in ownership of the major players; the delay in the passage of the Commonwealth RFA legislation and the resultant loss in confidence in future investment; the <i>Tasmanian Together</i> process and the effect the old growth logging benchmark had on investor confidence; Taxation provisions mitigating against plantation investment; and the decline in sawlog quality as a result of loss of high quality resource to the Comprehensive, Adequate and Representative reserve system. <p>There has been a significant shift toward value adding in the sawlog sector.</p> <p>The employment data in the background report is quite deficient. Notes the deficiencies in ABS data and advises that the submitter’s members employ 5000.</p>



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No.	Issues
	<p>The ABARE data are more accurate but with the addition of forest product transport operators and furniture and cabinet makers the real figure would be approximately 10,000. Applying a multiplier of 1.44 the employment contribution of the industry is estimated at 14,400.</p> <p>Recommends:</p> <ul style="list-style-type: none"> a) removing the Tasmania <i>Together</i> benchmark on old growth forest; and b) the Parties to provide reliable data to measure social and economic outcomes.
47	There will be soon no old giant trees left. Requests an end to old growth logging.
48	<p>The RFA is flawed.</p> <p>The public notice inviting comments did not provide contact details.</p> <p>Lack of public notification of changes to some of the RFA clauses.</p> <p>Requirement for a State of the Forests Report not met.</p> <p>Other obligations that have not been met on time for the first RFA review.</p> <p>10,000 ha which the RFA agreed to become Forest Reserve have not been gazetted.</p> <p>The process under Clause 39 to further assess world heritage values commenced, however no output has resulted. Completion of this process is essential for the Savage River Pipeline Corridor. Consideration of management of the Corridor has not happened. The report on the deep red myrtle review has no been made public.</p>
49	<p>Reserve system results in forest islands of forest ecosystems. Many reserves too small to be self sustaining.</p> <p>Plantations are changing the landscape, cause weed problems, impact on tourism and water catchments.</p> <p>Self regulation of forestry invites corruption.</p> <p>Complaints to the Forest Practices Board are dealt with in an unprofessional manner.</p> <p>The effects of the RFA indicates a lack of understanding, respect and sensitivity to the inherent values of old forests.</p>
50	<p>If properly managed forestry could be a highly sustainable industry both environmentally and economically, however, has concerns about current forest management in Tasmania.</p> <p>Only a small percentage of the original forests of Tasmania remain – forestry should be confined to regenerated and plantation forests. Old growth forests should be protected and practices changed to use pre-logged areas more efficiently.</p> <p>Should focus on the production of quality timber and reduce reliance on income from woodchips.</p> <p>The RFA must reflect the concerns and views of Tasmanians on clearfelling old growth forests and woodchipping expressed through the Tasmania <i>Together</i> process.</p>
51	<p>Environmental harm arising from clear fell and burning practice – impacts on water quality, ozone hole and human health</p> <p>Precautions to protect humans and their air quality, drinking water and soil before, during and after fire and spraying.</p>



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No.	Issues
	<p>Reduced water flows down stream of plantations affecting domestic water supplies and agriculture.</p> <p>Human health and environmental impact of pesticides in waterways.</p> <p>1080 usage when it is banned on the mainland.</p> <p>The wishes of 80% of Tasmanians to cease clearing of old growth forests as indicated in <i>Tasmania Together</i>.</p> <p>Integrity of World Heritage Area's boundary conditions and impacts of forestry.</p> <p>How would industry redeploy workers if clearfelling of old growth forests was ended.</p>
52	<p>The RFA has resulted in less resource security and certainty for the forest industry and wealth and prosperity for local communities dependent on forestry.</p> <p>The RFA fails to protect Tasmania's temperate rainforest. RFA mapping does not classify all rainforest as such.</p> <p>The RFA has failed to protect or address water resources.</p> <p>Clear felling of native forest in upper catchments with replacement by plantations is having a negative impact on water quality, and quantity.</p> <p>The streamside reserves required by the Forest Practices Code only protect water quality and do not address water quantity losses. A cost benefit analysis of development of plantations is needed.</p> <p>The RFA offers no protection for the values of water quality and biodiversity under the current forest practices system regarding streamside reserves, particularly for Class 4 streams.</p> <p>The RFA has facilitated major landscape changes with little consideration of social environmental and economic impacts on communities. The process should be started again.</p> <p>Photographs of forestry operations are included.</p>
53	<p>The RFA is not protecting vital community and wilderness values. For example, native forest in catchments in the north east are being converted to plantations while degraded forest has been placed in reserves.</p> <p><i>Tasmania Together</i> benchmarks have been disregarded.</p> <p>The Forest Practices Code is inadequate to underpin the RFA, because breaches of the Code go unpunished.</p> <p>Increase in plantations in North East Tasmania will be to the detriment of local communities through water degradation, visual impact and loss of jobs in tourism.</p> <p>A sustainable future for the forest industry and the RFA is not possible until the issue of clearfelling native forests for export woodchips is adequately addressed.</p>
54	<p>The RFA has been unsuccessful in providing a Comprehensive, Adequate and Representative reserve system.</p> <p>Notes that 5 Forest Reserves identified in the RFA have not been proclaimed and a number that have been partially proclaimed. Details on these areas are provided. Questions the reasons and process for some of the changes.</p> <p>RFA has failed to protect significant social and aesthetic values.</p>



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No.	Issues
	<p>Recommends additions to Shakespeare Hills Forest Reserve and Dip Range Regional Reserve.</p> <p>Further survey of unproclaimed proposed reserves should be undertaken. Forestry Tasmania should be accountable for their actions.</p> <p>Protection of remanent vegetation on King Island has not been achieved. Remaining unallocated Crown land blocks and native forest areas on State Forest on King Island should be reserved.</p> <p>Low forestry production value areas have been reserved and high production value forest remains as State Forest.</p> <p>Informal Reserves are not secure and should be securely protected. Creation of Informal Reserves is a failure of Clauses 48 and 68.</p> <p>Original RFA vegetation mapping was not very accurate. RFA timeframes did not permit accurate checking of vegetation, disturbance and tenure. All new reserves should have vegetation surveys prior to the next 5 year review.</p> <p>The Tasmanian Government should reassess its public reporting and consultative mechanisms in regard to the RFA process and implementation.</p>
55	<p>Concerned with the clearfelling of native forest. Tasmania has sufficient plantations. Native forest should be protected, both for its unique nature and the benefits in tourism that such areas provide.</p>
56	<p>The impact of removal of forests outside wilderness areas grossly impacts on the wilderness experience inside wilderness areas.</p> <p>It appears short sighted to convert native forests to plantations for woodchips with little return and few jobs.</p> <p>There is a land grab to convert as much native forest to plantation before anyone notices.</p> <p>Concerned about the lack of accountability of forestry due to their exemption from the provisions of the Freedom of Information Act. People are being kept in the dark.</p> <p>The RFA does not have support and does not provide for the people changing their mind.</p> <p>Notes that once about 30% of a valley has been converted into a patchwork of eucalypt 'paddocks,' it loses its potential for any other value.</p> <p>Asks what will be the impact on jobs of the increasing mechanisation of harvesting timber for woodchips, if the main focus of plantations remains woodchip production.</p> <p>Calls for the cancellation of the RFA and the cessation of woodchipping.</p>
57	<p>Is frustrated by the apparent lack of awareness by politicians of the value of protecting native forest for tourists and future generations.</p> <p>Opposes the clearfelling of old growth forest for woodchips.</p>
58	<p>The RFA has failed to protect old growth. Only 25% of Tasmania's original extent remains. They should be protected for future generations</p> <p>Forest management has not changed to an ecologically sustainable process.</p> <p>The RFA has resulted in fewer jobs in forest related industries such as craft wood, beekeeping and wood and paper product manufacturing, and record levels of woodchipping.</p>



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No.	Issues
	The Tasmania <i>Together</i> process indicated that clearfelling in certain areas should stop, but that there are plans to continue.
59	Identical to submission number 34
60	<p>Finds it difficult to assess whether the aims of the RFA are being met. What constitutes wilderness, old growth, and what the RFA sets out to protect is the subject of confusion. Would like to see a revised RFA that was agreed by all.</p> <p>Sees little evidence of development of fast growing exotic tree plantations like other countries.</p> <p>Notes that agreement on the appropriate balance between economics and conservation is blurred.</p> <p>It is unclear whether the RFA goals of economic development through the export of woodchips has been measured and valued against other uses for the timber and the land.</p>
61	<p>The majority of Tasmanians are against clear fell logging. Claims that politicians are not as well informed as they are.</p> <p>Is concerned about impacts of clearfelling including loss of chickens to eagles and devils, smoke pollution, contamination of watersheds and streams and noise pollution from log trucks.</p> <p>It is time to overhaul the RFA to determine who the real beneficiaries are.</p>
62	<p>Notes the success of the RFA in terms of the National Forest Policy Statement.</p> <p>Forest management should also be considered on a global scale The contribution of the RFA is making towards to objectives of forest conservation and management worldwide should also be considered. Notes that the RFA meets the forest conservation objectives identified by the IUCN and the WWF.</p> <p>Notes that Tasmania exceeds the minimum requirements of a Comprehensive, Adequate and Representative system under the National Forest Policy Statement.</p> <p>Urges the Commission to determine, based on the factual information contained in the Background Report, that the RFA meets the vision articulated by the IUCN and the WWF, as this would assist the world wide marketing of Tasmanian timber products as being produced on a sustainable basis.</p>
63	<p>Concerned that the Background Report does not report on the social aspects of the RFA and its implementation.</p> <p>The RFA review is an opportunity to assess the social impact of the RFA, in particular population changes, economic diversity, employment, infrastructure, social well being, community resilience and attitudes. These factors could be reported under the sustainability indicators.</p> <p>The work carried out by the Social Assessment Unit during the development of the RFA should be updated for this, and subsequent 5 year reviews.</p> <p>Communities identified as vulnerable during the RFA process should be reassessed to gauge the impact of the RFA.</p> <p>The Background Report demonstrates the environmental and economic milestones of the RFA have been achieved, but more work is needed on the social outcomes.</p>



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No.	Issues
64	<p>Positive achievement of RFA given complexity of agreement and ongoing forest debate.</p> <p>Deferral of the National Estate and Aboriginal Relics Act milestones have not hindered the implementation of the RFA</p> <p>Publication of reports has enabled public transparency for assessing forest management.</p> <p>Supportive of effort of governments in drafting Background Report listing actions to achieve compliance.</p> <p>For Ecologically Sustainable Forest Management highlights planning for nature conservation and threatened species, implementation of permanent forest estate policy and encouragement of native vegetation retention.</p> <p>Report on deep red myrtle shows the importance for continued access to Savage River Pipeline resource.</p> <p>Concerned about lack of progress in developing State Policies on fire management, nature-based tourism and recreation management, cultural heritage and forest pest and disease control. Calls for priority effort.</p> <p>Concerned about implementation of management plans across the formal reserve estate not yet completed. Vitally important that they are managed in accordance with the objectives of the RFA and aspirations of the community.</p> <p>Requests the review to highlight certainty for conservation management and resource access to enable and encourage investment and development of nature-based tourism and forest industry (cites Tahune AirWalk as good example).</p> <p>Tourist strategy should focus on new reserves created in RFA. Raises issue of Valley of the Giants (Beech Creek Counsel River) which was set aside in the RFA for old growth tourist value but has since been ignored by tourism industry.</p> <p>RFA report demonstrates achievement of multiple goals and that State is receiving social and economic benefits resulting from sound government policy based on RFA.</p>
65	<p>Comment on conservation groups request for further reservation of forests.</p> <p>Reserve system exceeds international targets. There has been over-reservation of forest and old growth by exceeding RFA commitments. Reserves with CAR values not being endorsed by green groups should be allocated back to multiple use management. There should be a trade off to provide more native forest for forest production and bring reservation levels back to RFA figures. Feel short changed that agreed indicative reservation levels are now exceeded with no attempt to offset these increases by withdrawing areas of reservation.</p> <p>Raises issue of iconic forest stands such as Valley of the Giants (Beech Creek Counsel River) and Blakes Opening which were set aside for tourist value and now being ignored for tourism.</p>
66	<p>Report demonstrates that public native production forests are managed on an ecologically sustainable basis.</p> <p>No reported extinction of flora and fauna. Commentary on changing status of threatened species with specific mention of orchids and forty-spotted pardalote.</p> <p>Evidence of Governments commitment to monitoring and acquiring knowledge of species of flora and fauna.</p>



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No.	Issues
	<p>Lack of evidence of Governments commitment to accurately assess employment numbers and monitoring social consequences of RFA.</p> <p>Calls for social study of communities following RFA.</p> <p>Calls for Commission review to publish funding levels for research priorities over the five year period of the RFA, in particular research funding of flora and fauna populations and socio-economic studies.</p> <p>Concerned about the relative lower priority being given by governments in implementing industry development commitments that support regional communities.</p> <p>Wants to see employment increased based on sustainable development of forests.</p> <p>Calls for a strategic plan to revitalise regional (people) communities devastated by an acrimonious forestry debate and loss of production forest. Need government help to rebuild these communities' future.</p> <p>Seeks government assistance in expressions of positive support to communities, assistance with vision and goal setting, financial assistance to establish new industries or infrastructure that increases value of products from forests in local industry.</p> <p>Raises issues of eligibility criteria in current government schemes and that they are difficult to access and find and seeks a 'one-stop-shop' for assistance under RFA implementation.</p> <p>Calls for government assistance in educating public about the sustainability of managed forests from an economic and social perspective. Requests for a government funded education programs to inform the public about the RFA and forest benefits.</p>
67	<p>Positive support towards RFA and Tasmania should reap the social, economic and environmental benefits of stable forest policy.</p> <p>RFA legislation should boost investor confidence.</p> <p>Need for public education about the RFA.</p> <p>Review should resolve some of the public concerns and highlight social, economic and environmental achievements.</p> <p>Delay in Federal legislation resulted closure of Burnie pulp mill and lost investment (pulp mill – Taiwan Pulp and Paper).</p> <p>Positive about State Government's move to add value to lower grades of timber resource (rotary peeled veneer, medium density fibre board timber engineering) and notes opposition to such projects.</p> <p>Arguments against these projects ignore significant environmental achievements and implementation of significant commitments under RFA.</p> <p>RFA achievements are the Comprehensive, Adequate and Representative reserve system and Ecologically Sustainable Forest Management practice and use.</p> <p>Permanent forest estate framework has been implemented together with strategic planning of natural resource management and biodiversity.</p> <p>Sustainable yield review demonstrates that the legislated sawlog yield is sustainable over the next century.</p>



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No.	Issues
	<p>Sees opportunity for Tasmanian industry to replace imports of timber products from countries that do not have the environmental standards of management.</p> <p>Help to reduce Australian import balance in pulp and paper products.</p> <p>RFA provides a platform for ensuring certainty in conservation of environmental values and future growth and development of Tasmanian industries associated with forest and timber products.</p>
68	<p>Supports RFA and Governments in achieving RFA commitments and milestones.</p> <p>States that promotion of farm forestry and plantations on cleared land has provided a positive resurgence in their community and local economy despite the contradictory comment in the media.</p> <p>Community celebrating the growing vitality and strength of community.</p> <p>Requests action by Governments to raise public awareness of RFA benefits.</p> <p>Calls for a study to review environmental, economic and social benefits so as to inform regional communities and local governments.</p>
69	<p>The RFA has failed to protect old growth forests. The RFA was supposed to protect 60% of remaining old growth for each forest type. This target was not met for the three main species of tall eucalypt: <i>Eucalyptus regnans</i>, <i>Eucalyptus obliqua</i>, and <i>Eucalyptus delegatensis</i>.</p> <p>The RFA has failed to protect wilderness. It was supposed to protect over 90% of wilderness forests. 30% of wilderness forests remain under threat from logging – areas include the Tarkine and South-West. The Bacon Government's claim that 95% is reserved includes buttongrass that remains threatened by mining as 'protected wilderness'.</p> <p>The RFA has encouraged ecologically unsustainable forest management. Over 65% of logging operations consist of clear-felling and burning. About 70% of native forests clear-felled are replaced by plantations or no tree cover at all. The balance of the \$71 million received by Forestry Tasmania should be diverted to encouraging downstream processing of our existing plantation resource. The 1997 Clark Report identified 1000 jobs that could be created by further processing, rather than exporting logs to Korea.</p> <p>The Southwood proposal does not help downstream processing. It is dominated by woodchipping.</p> <p>The rate of conversion of native forests to plantations and young regrowth means that native forests attributes can't be sustained: wildlife habitat; rainforest species; specialty timbers; wilderness; reliable domestic water supplies; large diameter eucalypt sawlogs; and scenery.</p> <p>The RFA has resulted in massive levels of clear-felling. Concerns with smoke impacts, impacts on tourism industry, habitat loss, old growth not able to grow back in the 80 year clear-fell cycle, the 80 year cycle not adhered to, the loss of hundreds of non-target native animals through the use of 1080 poison.</p> <p>The RFA has accelerated clearing of Tasmania's native forests. This equates to lost potential to re-grow tall trees – habitat and specialty timbers permanently destroyed.</p> <p>The RFA has resulted in less downstream processing and fewer jobs in forests.</p>



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No.	Issues
	<p>Woodchipping set successive records in three quarters in the year 2000 – total for the year reached 5.3 million tonnes. Indicates rampant acceleration in woodchipping since RFA was signed. There seems an extremely high proportion of wood harvested from native forests that is classed as pulpwood.</p> <p>Tasmania is now exporting huge quantities of whole logs, many logs are from native forests. Demonstrates the abject failure of the RFA and its adherents to develop downstream processing, investment or jobs.</p> <p>Recommend expanding and creating new reserves the Tasmanian Wilderness World Heritage Area; the Styx Valley of the Giants National Park; the Tarkine; North-East Highlands; Great Western Tiers; extend Ben Lomond National Park. Eastern Tiers; Tasman Peninsula; Reedy Marsh; and a number of other areas.</p> <p>10,000 hectares of areas agreed in the RFA to become Forest Reserves have not been gazetted. Some reserves have been severely modified and others not gazetted at all. Failure to establish reserves as agreed in the RFA should be a specific item in the reference for the review.</p> <p>A network of informal reserves was identified under the RFA. The status of these areas is unclear and no data has been provided to enable scrutiny of decision making in respect of them.</p> <p>No formal mechanism to protect areas of threatened communities on Crown land despite commitments in the RFA. These communities on Crown land need to be securely reserved within good boundaries, not left as isolates in a sea of plantation or production forest.</p> <p>Recommends a thorough review of the failure to gazette the reserve system.</p> <p>Recommends that formal procedures be identified for capturing areas of native forest that have to be reserved on Crown land to ensure long term security.</p> <p>The current State policy subverts the intent of the RFA by permitting the clearing of a further 50% of the vulnerable and endangered forest communities on private land. Amendments to the <i>Forest Practices Act</i> to cover clearing of native forest as part of agricultural development are late, ineffective and not resourced.</p> <p>Commitments in the RFA and Natural Heritage Trust Partnership Agreement require mechanisms to encourage native vegetation retention and management. Native vegetation clearance in Tasmania has seen a massive increase over the last five years. The Forest Practices System has failed to prevent clearance of threatened forest communities.</p> <p>No additional resources have been identified to police or manage a massive extension in the workload of the Forest Practices Unit.</p> <p>The Commonwealth should insist that the Permanent Forest Estate policy be amended to prohibit further clearance of endangered and vulnerable forest communities immediately.</p> <p>The effectiveness of the Forest Practices System should be the subject of stringent examination as part of the review.</p> <p>The policies and practices driving land clearing for forestry should be thoroughly reviewed on Crown and private land.</p> <p>Clauses 54 and 55 of the RFA require the State to review its deep red myrtle resource and publish its findings and consider further management in the Savage River Pipeline corridor prior to the first 5 year review. This has not occurred.</p>



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No.	Issues
	<p>While well overdue, understand that the report has been completed. However, instead of being released publicly, it has been submitted for audit. Such an action may allow modification of the report in response to the auditor's comments, without public scrutiny.</p> <p>Recommend releasing the deep red myrtle resource report – and the future of the Savage River Pipeline Corridor should be a specific item in the Terms of Reference for the RFA review.</p>
70	<p>Concerned about the practice of clearfelling, and the increasing number of log trucks on the road.</p> <p>Concerned about the health and environmental effects of forestry fires, in particular smoke pollution, and the death of native fauna.</p> <p>Concerned about the impacts on water quality of pesticide use, particularly triazines which are prohibited in France, and the resulting human health effects of drinking the water.</p> <p>Seeks proof that all aspects are taken into considerations such as environment, pesticides, consultation, human health, water supply and jobs.</p> <p>Suggests the majority of Tasmanians disagree with logging native forest and that this view needs to be heard.</p>
71	<p>Concerned about forest management including destruction of wilderness and wildlife and a disrespect for people's health and rights.</p> <p>Concerned about the health effects of smoke pollution from forestry fires and the impacts on water quality of pesticide use, particularly given the number of forestry coupes that occur in water catchments.</p> <p>Believes that a review of the RFA should look at all aspects, including proof that all practices do not harm the environment, human health, the water supply and jobs.</p>
72	<p>RFA research elements do not go far enough in relation to the Montreal Process in particular indicators being researched.</p> <p>80% of old growth forest has been removed so it is too late to look at the success of management prescriptions.</p> <p>RFA was weighted to financial sustainability not environmental or ecosystem sustainability.</p> <p>Tasmania should be developing a value added industry, nurturing skills/resources to see Tasmania in to the future.</p>
73	<p>RFA process was flawed as much input was ignored. Input into this review is not an endorsement of the RFA. RFA should be scrapped.</p> <p>Agreed actions in relation to the National Estate have been all but ignored.</p> <p>Where there is new scientific information the process should be transparent, accountable and effective.</p> <p>No tangible output from the World Heritage assessment process. Assessment of Savage River Pipeline Corridor should have been completed for the review.</p> <p>Requests the Deep Red Myrtle Resource Review and independent audit to be made public. State has failed to comply with Clause 55(c) requirements. Future of the corridor should be reviewed by the RPDC.</p>



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No.	Issues
74	<p>Expresses a lack of faith in the review process as believes the Tasmanian Government is openly corrupt.</p> <p>Calls for the immediate cessation of clearfelling of old growth forest which is the only thing that makes Tasmania special. Defines old growth to be any forest with no significant human impact.</p> <p>Industry and government constantly lie to the public.</p> <p>Plantations are not environmentally sustainable.</p> <p>The number of jobs involved is small. More people could be employed if the forests were kept.</p>
75	<p>Disappointed that wilderness and old growth areas such as the Tarkine and Styx Valley are scheduled for clearfelling. Old growth areas are becoming increasingly rare.</p> <p>Return to Tasmania from tourism will be substantial in the long term.</p> <p>Supports the aim of Tasmania <i>Together</i> to halt clearfelling.</p> <p>Some sections of the timber industry have found that the existing RFA did not lead to an increase in jobs.</p> <p>The current RFA should not continue.</p>
76	<p>The RFA and Murchison District Forest Management Plan together have been responsible for record native forest destruction and woodchipping and loss of jobs.</p> <p>Criticises the public consultation provisions of the RFA (Clause 72) and uses two examples to illustrate failure of the consultation process.</p> <p>There is under representation of <i>Eucalyptus delegatensis</i> in the CAR reserve system while it was being logged at Mother Cummings Peak;</p> <p>Links forestry regeneration burning to the climate change issue.</p> <p>Threatened species conservation is not been adequately addressed in Forest Practices Plans contrary to the provisions of the Forest Practices Code.</p>
77	<p>Doesn't endorse the RFA, considers it to be biased in favour of the timber industry and not amenable to change.</p> <p>The State has failed to implement Ecologically Sustainable Forest Management and to promote the conservation and management of private forests.</p> <p>Questions whether the Parties have undertaken the World Heritage assessment of relevant Australia-wide themes.</p> <p>Is critical of the treatment of Clause 55 relating to the deep red myrtle review of the Savage River Pipeline. Specifically the review did not take account of the Deep Red Myrtle resource on private land, the resource in areas of less than 10 ha, and from 'arisings.' Because the Review was late and there has been little opportunity for the public to access it, a decision on the Savage River Pipeline Corridor should be delayed until the next RFA 5 Year Review.</p> <p>Is critical of the decision to exempt some forestry operations from the requirement for a permit to take threatened species.</p>
78	<p>Is against the continued logging of old growth forest. Believes that these forests should be better managed to attract income from tourism.</p>



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No.	Issues
79	<p>Concerned at the environmental devastation being caused by rate of clear falling occurring under the RFA.</p> <p>The State Government gave \$75 million towards job protection in the forest industries, but jobs have been lost. 80% of the industry do not use old growth. The price of woodchips has dropped since 1989.</p> <p>Comments on the impacts of the Southwood development and its dependence on the continuation of clearfelling.</p> <p>Is concerned about the health implications of smoke from forestry fires, and the use of 1080 and herbicides and resulting contamination of water supplies.</p> <p>Growth industries such as tourism should be financially supported and take precedence over industries that are shedding jobs and shrinking in economic performance.</p> <p>The RFA has done little to alleviate the problems caused by a reduction in the number of jobs faced by small rural communities such as the Derwent Valley.</p>
80	<p>Notes the Tasmania <i>Together</i> process called for the immediate cessation of clearfelling of old growth forests. The future of humanity is in small, intensive, rewarding work.</p> <p>The RFA takes away the people's rights to have their say, and is taking their jobs.</p> <p>Is concerned about the social impacts, such as increased unemployment, depression and crime arising out of the loss of jobs.</p> <p>Forestry as currently practiced is a dying trade, and that we should be focusing on such industries as tourism, small business, permaculture, beekeeping and woodturning.</p>
81	<p>The RFA has led to the massive destruction of Tasmania's forests and calls for it to be scrapped.</p> <p>Call for the protection of old growth forest, native forest and wilderness areas. These areas are important for the State's tourist industry. It is said that rainforest occupies only 7% of the State and that logging of old growth forest probably means that the target of 60% of old growth forest in reserves cannot be attained. Concern is raised about the wood demand of the 'Southwood' project. 18% of the original tall tree forests remain.</p> <p>Woodchipping is an unprofitable and undesirable industry. 50% of all logs going to woodchip are 'useable' for sawlog. The RFA enables an unlimited supply of woodchips to be taken and that Tasmania's total woodchip harvest is more than the rest of Australia's put together.</p> <p>Forest plantations are seen as detracting from the tourist industry and contributing to the disappearance of attractive small country towns. Plantations take over highly productive land that could be used for high value agriculture and deplete the quality of the soil. Chopping down old growth forest for low value plantations is poor economics.</p> <p>The Tasmania <i>Together</i> benchmarks relating to old growth forests should be adhered to.</p> <p>Figures are presented to show a substantial decline in employment by the timber industry during the 1990s.</p>
82	<p>Recognises RFA has good points but it should be flexible enough to take account of changing community attitudes, for example, on old growth logging.</p> <p>The security of jobs has not been realised.</p>



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No.	Issues
	<p>The financial return for Tasmania from forestry is questioned when compared to tourism if the forest were left as they are.</p> <p>Notes that regrowth and plantations have a percentage of rot and suggests this brings sustainability into question. Also doubts the sustainability of speciality timbers.</p>
83	<p>Expresses concern with:</p> <ul style="list-style-type: none"> • the waste of wood resource dating back to the 1970s when woodchipping was introduced; • destruction of old growth and native forests and their conversion to woodchips; • loss of variety, beauty and biodiversity; • likely effects of the loss of native forest in causing salinity and drought; • clearfelling of myrtle, celery top, sassafras and fern; • burning to waste; • use of 1080 poison; • replacement of native forest with pines; • the area of old growth and native forest cleared now exceeds land clearing and woodchipping carried out in all other states combined; and • loss of historic heritage values to forestry operations.
84	<p>The RFA has failed to protect old growth forest – only 25% of 1800 area remains.</p> <p>The RFA has failed to protect wilderness forest – more than 30% remains under threat.</p> <p>The RFA has accelerated clearing of native forests mainly for plantations with consequent environmental, social and economic impacts.</p> <p>The RFA has resulted in less downstream processing and fewer jobs.</p> <p>The RFA has resulted in record levels of woodchipping.</p> <p>The RFA is contrary to Tasmania <i>Together</i> and should be scrapped with an immediate halt to logging of old growth, clearing of native forest and hidden subsidies. Logging levels should be drastically reduced.</p>
85	Submission identical to 73.
86	Many tourists come to Tasmania to see our forests. Calls for an end to the logging of remaining native forest.
87	Identical to submission 48.
88	Identical to submission 84.
89	Current rate of clearfelling threatens natural values. The RFA should be renegotiated.
90	<p>Forestry Tasmania is exempt from most constraining legislation and the Forest Practices Code is ignored.</p> <p>Tasmania <i>Together</i> process showed the majority of Tasmanians do not support old growth logging.</p> <p>Log trucks in towns are affecting tourism initiatives and are less people are now employed to drive them. Tourism offers more in the long term.</p> <p>Notes developments in overseas countries. RFA does not sufficiently protect tree ferns.</p> <p>Requests RFA to be restricted.</p>



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No.	Issues
91	<p>Background Report clearly demonstrates that native forests are being sustainably managed.</p> <p>The reserve system exceeds international targets. There has been over reservation of forest and old growth by exceeding RFA commitments. There should be a trade off to provide more native forest for forest production.</p> <p>Social and economic benefits of the RFA are understated. Employment figures require more work to identify the full extent of the industry and those employed to service it. ABS data is clearly inaccurate. Value of roads to tourism and recreation provided by the industry is not reported.</p> <p>Not enough is being done by the Commonwealth to implement the RFA undertaking (Attachment 12) to educate public on forest management. This is hindering forest industry development and investment.</p> <p>Notes the delay in passing Commonwealth RFA legislation and that the opportunity now exists to expand domestic processing of lower grades of wood.</p> <p>Aspects of social change such as population changes, economic diversity, employment, infrastructure, social well being and community resilience and attitudes should be measured as future sustainability indicators.</p>
92	<p>Expressing contempt, distrust and disgust for the RFA and calls for it to be scrapped.</p> <p>Sorting of the reserve target setting process by applying the JANIS criteria to Tasmania as a single region. Comprehensive, Adequate and Representative reserve system is 230,000 ha short.</p> <p>RFA has led to one of the largest land clearing events in Tasmanian history at a rate in the last 5 years greater than Queensland.</p> <p>Probity issue attached to the payment of \$90 million compensation when more land and timber was made available to industry.</p> <p>Reduction in threatened species protection, increase in logging of threatened species habitat/ increase in the number of forest dependant threatened species.</p> <p>Failure to meet virtually any milestone on time or to progress milestones to an appropriate degree.</p> <p>Negative impacts on regional Tasmanian communities from plantation malpractices including use of poisons and depopulation.</p> <p>Breach of National Competition Policy; lack of faith in the Forest Practices System because of it derisive and dismissive approach to community complaints and lack of transparency; and perception of fraud and corruption in the industry.</p> <p>Confidence in the Review process is diminished by:</p> <ul style="list-style-type: none">• the Minister's refusal to modify the terms of reference of the review;• failure to resource stakeholders to enable equitable participation;• the Commission not preparing the Background Report;• the failure to meet the legislative requirements to describe the resources which is the subject of the inquiry; and



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No.	Issues
	<ul style="list-style-type: none">the failure to publish details of the Commissioners conducting the Inquiry together with declarations of their financial and/or political interests or affiliations. <p>The RFA is intended to be responsive to new information and that the Review should meet this challenge by recommending appropriate changes to the RFA.</p> <p>Little comment is made on the Sustainability Indicators because they were largely condemned by the conservation movement when originally released for public comment, the data is not identifiable, the process doesn't allow for veracity of interpretations to be independently tested, the indicators don't relate to the review, there is no indication of how the indicators will be taken into account, and stakeholders have not been resourced to allow effective engagement.</p> <p>The Sustainability Indicators Report should be independently reviewed.</p> <p>The Background Report fails to detail the requirements for a State of the Forests Report and how this will be progressed by the Review process.</p> <p>The Commission should prepare a further background report comprising a draft State of the Forests Report for public comment.</p> <p>10,000 ha of land recommended by the Commission for reservation as Forest Reserves has not been gazetted. Additional areas should have been reserved to make up for the short fall in communities in areas wrongly identified as carrying particular communities.</p> <p>Concentration of under reserved communities in the North East are on good plantation sites. Most of areas not reserves as recommended are Forest Reserves.</p> <p>Mother Cummings Peak and other examples of recommended reserves hard won by local groups reversed in the final outcome.</p> <p>Dans Hill Forest Reserve has been revoked.</p> <p>The RFA assessment failed to identify appropriate management (including reservation) of National Estate values. The RFA failed to reserve rainforest and <i>Eucalyptus regnans</i> glacial refugia values in the North East and cite the submission for a National Park for Tasmania's North-East Highlands. The Commission should reassess the National Estate values and address the values that should be reserved. The Commission should review the legality of Clause 27 of the RFA which suspends the operation of the <i>Australian Heritage Commission Act 1975</i>.</p> <p>The conservation status of forest dependant threatened species has continued to decline, eg wedge-tailed eagle, masked owl, azure kingfisher, and spotted tailed quoll.</p> <p>Limited activity in relation to preparation of recovery plans, recovery actions, research and protection of threatened species.</p> <p>Clause 96d has not been complied with because the Scientific Advisory Committee have not included reference to the relevance of particular changes to the threatened species schedules to the RFA in public notices advertising proposed changes. The Background Report has not indicated that the Scientific Advisory Committee has in any way considered changes to the list of the RFA Priority Species. The adoption of the Threatened Fauna Adviser without public consultation is a clear breach of Clause 94d. The Tasmanian Government knew that Clause 31 was not true at the time of signing.</p>



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No.	Issues
	<p>It is reasonable to expect that World Heritage assessment of any additional listings would have been completed by the first 5 year review. In the context of the Savage River Pipeline Corridor World Heritage assessment would be necessary to inform future land use decisions. Accurate identification of World Heritage values and their implications for the RFA should be taken into account as part of the Review. The review of the Deep Red Myrtle Resource should have been produced in the first four years. In accordance with Clause 55a the report should have been published rather than sent to the auditor. There is no audit report in breach of Clause 55b. The State has not considered further management in the Savage River Pipeline Corridor in the first five years contrary to Clause 55c. The commission should consider the question of future land use in the Savage River Pipeline Corridor and should recommend that the area be reserved or unavailable for logging for the life of the RFA.</p> <p>Clause 57 of the RFA provides for details of any changes to Informal Reserves to be both publicly available and made available to this Review. Expressed concern with a decision by Forestry Tasmania to interpret this to mean that details of changes would only be made at the time of the Review. Reporting of the changes in the Background Report is at odds with correspondence from Forestry Tasmania. The State has not introduced mechanisms to encourage native vegetation retention (Clause 8 Attachment 9). Tasmania has a commitment to a no net loss of native vegetation through the Tasmanian Natural Heritage Trust Partnership Agreement and Clause 8 of the RFA. This is at odds with the Intensive Forest Management Program which seeks to establish 100,000 ha of plantations primarily through clearing native vegetation.</p> <p>Clause 11 requires that there be a review of the Permanent Forest Estate Policy. This is essential as the current policy provides for clearing of up to half of critically endangered communities. There is no mechanism for the Forest Practices Board to implement the policy. The Chief Forest Practices Officer is in receipt of advice from Comprehensive, Adequate and Representative Scientific Advisory Group on appropriate thresholds for a new policy but no change has eventuated. The Commission is urged to recommend the Advisory Group's advice to government.</p> <p>Changes to the legislation to remove anti-competitive or potentially anti-competitive provisions has not prevented a significant concentration of ownership resulting in near monopoly ownership of woodchip resources. This has serious implications for competition. The current National Competition Council review of forestry legislation indicates a problem in this area. Forestry Tasmania's activities on public land and the RFA funding package in particular has led to serious breaches of National Competition Policy. The return on equity of Forestry Tasmania is unacceptably low and that this corresponds with higher average returns by Gunns Ltd. A report by NJ Edwards is attached to the submission.</p> <p>There is only a cursory treatment of forest management in the background report.</p> <p>Fulfilment of Commonwealth obligations under Clause 22 to remove regulatory control over logging in Tasmania is not welcomed by the wider community and that this frustration has been expressed in the Tasmania <i>Together</i> benchmarks. The Commission should take account of the Tasmania <i>Together</i> benchmarks.</p> <p>Examples are given of problems with forest management in use of chemicals, logging of areas subject to long standing reserve proposals, a breach of a Forest Practices Plan, traffic hazards, degradation of view shed from important tourist areas and failure to reserve an important geophysical feature.</p>



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	<p>Examples from the Upper Meander Catchment Group include widening a buffer strip to prevent credible data being collected from a waterwatch site, old growth forest being wrongly identified, logging of research sites in respect of quolls and eucalypt pollination, destruction of the Gondwana Walk, damage to Aboriginal sites due to landslip in the Dunnings Rivulet area, downgrading of soil sensitivities in the Dunnings Rivulet landslip zone and logging in landslip risk zones.</p> <p>The Forest Practices System only responds to complaints. There is inadequate funding for the operations of the Forest Practices Board and for the conduct of research recommended as a result of the review of the Forest Practices Code. Reform of the system is advocated with the central element being to bring back the Forest Practices System under the auspices of the State's Planning System.</p> <p>The provisions of Clause 53 to transfer the remaining deferred forest to the Register of Multiple Use Forest results in an increase of 1000 ha of additional land to the logging industry. Questions whether the deferred forest should have been counted as reserved from logging or not.</p>
93	<p>The RFA should have a complete overhaul as it is not protecting old growth forest, wilderness and local community jobs.</p> <p>We are losing assets for short term gain of a few. Jobs in wood and paper products have decreased 50%.</p> <p>Forests must be protected in secure reserves. Woodchipping, clearfelling and burning off should halt and there should be a sustainable forest industry based on selective logging and local industry.</p>
94	<p>The scope of the RFA review is inadequate.</p> <p>National Estate values have been ignored and the conservation status of threatened species within forest communities is in doubt.</p> <p>There has been no mention of the assessment of World Heritage values required by Clause 39 since 1999.</p> <p>Protests the lack of availability of the Deep Red Myrtle Resource report to allow its scrutiny prior to public hearings. Clause 55(c) has not been complied with. Requests the Commission to place priority during the review on the future of the Savage River Pipeline Corridor.</p>
95	<p>Is concerned with the corporatisation of the forestry industry with the resulting replacement of small family businesses with large corporations that have little social conscience.</p> <p>Does not support plantations or the use of State funds for projects like Southwood.</p>
96	<p>The RFA has failed to provide environmental sustainability of the forest industry as large areas of forest are being destroyed and replaced with plantations without proper flora and fauna surveys being carried out first.</p> <p>The RFA has not met its criteria for forest community reservation, for example old growth in some key communities. In many cases the reserves are not secure.</p> <p>The areas identified in the Tasmania <i>Together</i> process as important should be protected.</p>
97	<p>The RFA Act should be abandoned because the intent to protect old growth, wilderness and threatened forest communities has not been realised.</p>



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No.	Issues
	<p>The RFA has promoted unprecedented levels of clearfelling and conversion to plantations.</p> <p>Supports Prof Kirkpatrick's views on the RFA process.</p>
98	<p>The RFA has failed because it has not protected native forests while providing for a secure living for the people employed in the industry. The RFA needs to be drastically changed.</p> <p>The RFA has sped up the clearing by clearfelling and burning of Tasmania's forests.</p> <p>Native forest is replaced by plantations that are susceptible to insect damage.</p> <p>Specialty timbers are burnt or woodchipped.</p> <p>No need to burn for plantations. Burning has impacts on fauna habitat, tourism and human health.</p> <p>The RFA has not properly protected old growth forest.</p> <p>Woodchip export and production data should be publicly available.</p> <p>Notes Tasmania <i>Together</i> process showed clearfelling of old growth should stop. Overseas markets for wood from old growth will disappear.</p> <p>Notes forest industry jobs have decreased in last 10 years. Old growth logging threatens jobs in fine timbers and furniture industries.</p>
99	<p>Has seen a large increase in clearfelling and conversion to plantations within local upper catchments, which has not taken account of water values, particularly the quantity of water needed to sustain a variable agriculture industry inn the future.</p> <p>Research is required on the impacts of plantations on water supply.</p> <p>The RFA should recognise that a reserve system for rivers should be put in place.</p> <p>The RFA does not protect old growth.</p>
100	<p>The Background Report clearly demonstrates the essential status of the forest industry in Tasmania's economy.</p> <p>The Background Report has a significant emphasis on the conservation and ecological issues, with a lesser emphasis on the social and community issues.</p> <p>State and Federal funding should be provided to promote public education on the values of forests for all uses, not just preservation. There is little understanding within the community of the linkage between the uses of forest products and the need to harvest trees.</p> <p>There is a need to provide more resources for innovative but commercially viable development of Tasmanian industries based on forests and timber products. Such activity should be given greater emphasis during the RFA implementation, as this would put people and jobs on an equal footing with conservation objectives.</p> <p>Supports the continued stability the RFA in Tasmania provides and considers that in general terms its implementation has been successful.</p>
101	<p>Does not reject the RFA, as there needs to be a balance.</p> <p>Checks built into the RFA have not been properly implemented, as targets for protecting certain forest types have not been met.</p> <p>Since the RFA, woodchipping has soared and jobs decreased.</p>



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No.	Issues
	<p>The Forest Practices Board is not independent and does not adequately control forestry operations.</p> <p>Clearfelling is not the only way to regenerate forests. Selective logging of minor species within old growth forests is a viable alternative.</p> <p>Southwood does not represent progress. Believes greater emphasis should be placed on the development of a forest-based tourism industry.</p> <p>Tasmania <i>Together</i> process showed that Tasmanians want old growth forests protected. Supports increased taxes being used to retrain/reimburse workers.</p>
102	<p>The RFA is deficient because it does not address the issue of conservation of water quantity values through the preservation of intact upper catchment areas.</p> <p>There needs to be recognition that upper catchment areas are major contributors of water. Reserves need to be set aside to ensure adequate water supplies.</p>
103	<p>Forestry and logging in Tasmania have to stop now. Cites examples of waste of sawlogs, specialty timbers, firewood and tree ferns, logging of large trees.</p> <p>Tasmania's greatest asset is its natural beauty.</p> <p>Tourists do not like seeing clearfelled forests.</p>
104	<p>Greenhouse Gas emissions – current forest practices contribute unnecessarily to net green house gas emissions, including the use of original forest as resources for woodchips, veneer and sawlogs, and the practice of forest regeneration burns.</p> <p>Biodiversity – current forest practices do not sustain fauna and flora biodiversity.</p> <p>Monitoring – Forestry Tasmania does not properly regulate the Forest Practices Code. Speciality timbers are wasted. There is an immediate need to set up an independent body to regulate the Code free from conflict of interest.</p> <p>Jobs – the RFA has lead to a reduction in the number of forestry jobs as it has failed to deliver efficient use of the timber resource.</p>
105	<p>The private forest estate represents about half of the commercial forest resource in Tasmania.</p> <p>RFA provides the opportunity for private forest owners to sustainably manage their forests. A significant component has been the acceptance of the Private Land Reserve System and off-reserve management.</p> <p>\$30 million provided under the RFA is insufficient to implement the reserve system. Work done to date has been a thorough scientific approach. Disappointed that the complete system has not been achieved in first 5 years.</p> <p>Important that target values are given the highest priority in developing the system. Benevolence of owners with non-target forest should not detract from achieving the targets. Most concerned that non-achievement of targets may mean the return of unspent funds to the Commonwealth.</p> <p>Most concerned with the erosion of private rights and insipient creep of uncompensated public good conservation. There is a position where without commercial compensation enough is enough. Support off-reserve management initiatives. Expansion of the Forest Practices System to include duty of care and land clearing and firewood operations have been a significant contribution from the private sector to conserving native vegetation.</p>



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106	<p>The level of public opposition to the Government's policy and approach of Government to that public opposition.</p> <p>Terms of reference unnecessarily restrict the review.</p> <p>RFA is a failure because it failed to properly identify and reserve old growth, many communities not adequately reserved, regional reservation targets not used, fauna not considered adequately, permanent native forest policy poorly negotiated.</p> <p>Five of the nine regions have less than 20% by area in reserves and 20% is an inadequate benchmark.</p> <p>Tasmania is the only State without vegetation clearance controls – should be run by an independent Environment Protection Authority, not the Forest Practices Board.</p> <p>RFA permits continued logging of depleted (<10% remaining) and endangered vegetation communities.</p> <p>Stored carbon is down – linked to forest cover reductions from 76% to 46 % in 200 years.</p> <p>The Background Report is not objective or independent – doesn't address the known failings of the RFA.</p> <p>A Commission of Inquiry into Forestry Tasmania, Forest Practices Board and Private Forests Tasmania is proposed.</p> <p>4500 jobs lost since 1990 corresponding to massive increase in woodchip production. Since 1996 woodchip production has increased from 2.889 million to 5.4 million tonnes and sawlog recovery has dropped from 10% to 5%. Alternative sources of economic activity from forests and jobs include the tourism industry, protection of water catchments, organic agriculture, reducing community conflict over forestry.</p> <p>Legislated sawlog quota (300,000 cu. m./annum of cat 1 and 2, sawlogs) is a non-ecological rigid and inflexible requirement. No sustained yield for pulpwood and concern that the pulpwood cut is not sawlog driven as per the policy. 85 year rotation is too short for many Tasmanian forests – 120 to 150 in some types. 300,000 cu.m not based on sustained yield and doesn't take account of discounts for areas unavailable for logging. Sustained yield should have been further reduced by RFA reserves and if not why the compensation payments by the Commonwealth. Need a true sustained yield calculation as over cutting will have serious employment consequences. This should be undertaken by an independent organisation.</p> <p>Forest Practices Plans should be publicly available on the internet.</p> <p>Self-regulation is a failure because the same person can initiate authorise and implement a Forest Practices Plan. It is also a process failure and leads to corruption. No third party appeal rights.</p> <p>The Forest Practices Code is: not based on science; does not meet the Montreal Process Criteria, does not protect catchment headwaters and doesn't consider the cumulative effect of fragmentation of forest systems. Numerous breaches are not followed up.</p> <p>Forest operations are exempt from the <i>Environment Protection and Biodiversity Conservation Act</i> (Cth).</p> <p>Threatened species provisions are deficient in that the <i>Threatened Species Protection Act</i> doesn't consider plant communities and the recovery plans don't work.</p>



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	<p>Private Timber Reserves are not subject to local government planning schemes or third party appeal. Proposed a Private Timber Reserve system with land clearance controls, third party rights of appeal, subject to local government planning schemes, the <i>Forest Practices Act</i> to be incorporated in the Resource Management and Planning System.</p> <p>Tasmania's obligations to the Commonwealth to protect biodiversity on private land are best discharged by introducing land clearing legislation. Land clearance controls should be effective, controllable, enforceable, introduced promptly and without hysteria and not tied to the Forest Practices Board. Without legislation the State should fund private land conservation.</p> <p>Forestry is a permitted use and should be a discretionary use, subject to advertising and appeal rights.</p> <p>The Private Forest Reserve Program has under performed against its target. The \$30 million is inadequate to meet market prices and can't compete against the forest plantation industry. The Forest Practices Board repeatedly fails to refer candidate areas to the Private Forest Reserve Program as required, or the areas are referred after the Forest Practices Plan is approved.</p> <p>Permanent Forest Estate Policy allows half of communities with <10% of their original distribution remaining to be logged. Comprehensive, Adequate and Representative Scientific Advisory Group's advice is recommended for adoption.</p> <p>There is mass public disapproval of forestry policy.</p> <p>All high conservation forests, including old growth on public land should be conserved without delay.</p> <p>High conservation values forest are not required for the sawlog industry and that the conservation values out weigh wood production values.</p> <p>The Mother Cummings Peak incident is an example of intrusion into the proposed Great Western Tiers National Park.</p> <p>RFA funds for a Great Western Tiers Interpretation Centre have been squandered.</p> <p>Examples are submitted to demonstrate the alienation of local rural communities, the failure of the Private Forest Reserve Program, the failure of the Forest Practices system, the failure of the system to protect threatened species and the failure of Councils to protect land owners' interests.</p> <p>The Tasmanian RFA is 250,000 ha short on the Reserve target.</p> <p>Recommends:</p> <ul style="list-style-type: none">• an inquiry into mis-spending of \$1.5 million on the Great Western Tiers Interpretation Centre;• a forestry ombudsman;• an immediate cessation of logging in all habitat and modelled habitat of threatened species;• a halt in the decline of genetic diversity;• explicit industry support for secure reservation of all high conservation forests on public and private land;• conservation of all forest of Gondwanic origins;



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	<ul style="list-style-type: none"> • signposting of all RFA Reserves; • a statewide ban on triazine herbicides; • no regeneration burning or fuel reduction burning; • the cessation of the use of 1080; • the reconversion of plantations to native forest where adjacent to reserves or where original vegetation was rare; • Forestry Tasmania is downsized to a sales organisation with forest managed by land management agency; • mixed species plantations for timber to replace current plantations for paper; • an Environmental Impact Study be conducted for each coupe logged; • cost recovery from logging transporters; • no further expansion of logging roads; • a referral of forest practices and the RFA to the Federal Police for environmental crimes; • the end of export of whole logs; and • industry and farmer support for comprehensive private land clearance controls.
107	<p>The Forest Practices System and the outcomes required by the RFA are not being met.</p> <p>Provides detailed community based audit reports of Mt Arthur coupe LI 126C and Lebrina RT 241F describing alleged breaches of the Forest Practices Code and environmental harm to the catchment areas. Claims that the Forest Practices Board has not discharged its duty in regard to regulating the Code.</p> <p>Express concerns with respect to lack of communication of information and consultation by Forestry Tasmania on issues of concern to the local community.</p> <p>Claims that the RFA has been breached through failure to protect threatened species by application of agreed management prescriptions.</p> <p>Mt Arthur and Eaglehawk Forest Reserves proposed under the RFA were not proclaimed in accordance with agreed boundaries.</p>
108	<p>Major concern is resource security for access to sawlog resources (eucalypt, softwood and special species). RFA has brought a degree of certainty that has facilitated confidence to invest in new equipment and increased employment.</p> <p>Country sawmills are significant employers in rural communities. Their demise would have drastic impact on local communities.</p> <p>Forest Industries Client Manager funding expiration is inconsistent with RFA. The role of the Client Management is important.</p> <p>Skill development is a critical component of the development of the industry. How is this to be done with the impending withdrawal of funding to industry training boards?</p> <p>RFA implementation had been a success. Delays in some actions largely inconsequential and to be expected given the size of the tasks.</p>
109	<p>The Community Agreement between Forestry Tasmania and the Tasmanian Beekeepers Association has not facilitated development of the apiary industry. The application of the guidelines is threatening the industry and pollination services for the agricultural and horticultural industries.</p>



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110	Opposes the RFA. The RFA breaches the faith of those who participated in the process. It has failed to protect forests, failed to bring sustainability and security to the industry. Includes copies of Hansard transcripts of speeches on the RFA Bill and other legislation.