

Review of The Permanent Native Forest Estate Policy (PNFEP)

Submission by the Institute of Foresters of Australia Inc. (Tasmanian Division)

This submission has been prepared by the Committee of the Tasmanian Division of the Institute of Foresters (IFA) in response to the recent call for submissions on the review of the PNFEP on the Department of State Growth website. A brief description of the IFA and its objectives is provided as Attachment A.

The IFA has developed and regularly reviews a comprehensive suite of policy statements. These can be viewed at <http://www.forestry.org.au/publications/ifa-policy-statements>. Attachment B provides a brief summary of the subset of those policies that are relevant to the issue of native forest clearing and the maintenance of a permanent native forest estate. These policies have assisted the Tasmanian Division to prepare this submission.

The Tasmanian Division of the Institute has also referred to the two forest certification standards that are voluntarily chosen by the major Tasmanian forest managers to provide certification of their sustainable forest management for use in national and international markets. These standards are the Australian Forestry Standard and the draft FSC national standard for Australia. Attachment C provides the requirements of certified forest managers in relation to prohibitions on forest conversion.

The Tasmanian Division of the Institute has considered the current Tasmanian Government Policy for Maintaining a Permanent Native Forest Estate (dated 8/12/2014) to inform this submission.

The Tasmanian Division of the Institute provides its views on the various topics listed below:

The current PNFEP (as at 8/12/2014)

The current policy was thoughtfully developed and has made an important contribution towards its stated objectives of:

- i) Maintaining and sustainably managing Tasmania's native forest resource base and associated economic, nature conservation, ecosystem services, scenic, cultural and amenity values;
- ii) Ensuring that the conservation status of forest communities is maintained or enhanced;
- iii) Providing for the reasonable aspirations of the Tasmanian community for sustainable economic development; and

- iv) Ensuring that private landholders continue to be able to manage native forest on private land on a sustainable basis, including existing sustainable uses of those forests.

The goal of retaining a minimum of 95% of the 1996 CRA native forest area

The goal has, within the resolution of the mapping compiled in 1996, effectively been met. That is, Tasmania now has at least 95% of the native forest cover it had in 1996.

The Tasmanian community, and private landowners in particular, have had a decade in which to conduct broad-scale clearing and conversion within the guidelines contained in the PNFEP.

The decision by Government to defer the implementation of the ban on broad-scale clearing and conversion on private land for a further 12 months will provide further comfort to a small number of landowners who still seek to undertake broad-scale clearing and conversion. This will result in some additional clearing of the order of 1000 to 2000 ha, which (within the resolution of the data) will still be consistent with the statement that Tasmania has at least 95% of the native forest cover it had in 1996.

There is very little value in permitting further broad-scale conversions on the spurious basis that there might still be a little “headroom” before the 95% threshold is met on the basis of an accounting of reductions recorded in Forest Practices Plans. Nor is there any value in seeking to continue broad-scale conversion on the basis that a small number of current and planned forest restoration projects could marginally increase the native forest estate and hence (somewhat perversely) allow additional conversion on the basis of a spurious accounting exercise. In reality these modest restorations may well amount to considerably less than the undetected small-scale native forest conversions that probably occur, particularly on private land, and which have not been the subject of Forest Practices Plans.

The consistency of broad-scale conversion and clearing with Sustainable Forest Management

Broad-scale conversion and clearing is inconsistent with any modern definition of sustainable forest management in the Australian context. This view is similar to that indicated by the two relevant forest certification standards that are applied in Australia (see Attachment C).

No large Tasmanian forest manager seeks to conduct broad-scale conversion and clearing. In fact, those that already have, or are seeking, forest certifications would probably prefer that broad-scale conversion and clearing be clearly not permitted under Tasmanian policy. This would clarify a current perception, perhaps exploited by some ENGOs, that there is a significant risk of broad-scale clearing and conversion in Tasmania, which can be used to discredit the otherwise world-leading conservation credentials of Tasmania.

Even small Tasmanian forest owners are very unlikely to wish to conduct broad-scale clearing or conversion, especially if they would otherwise seek to sell the resultant forest products into national and international markets. Such owners can sell their

timber as certified sustainable produce if they enter into group certification schemes for small to medium enterprises and forego any options to conduct broad-scale clearing and conversion.

In summary, the Tasmanian Division of the Institute believes that the pursuit, and reputation, of sustainable forest management would be enhanced by the cessation of broad-scale clearing and conversion.

The definition of small scale clearing and conversion in the PNFEP

The PNFEP definition of small-scale clearing and conversion of being less than 20 ha in any period of five consecutive years is appropriate and similar, on an annualised basis, to the upper limit described in the Australian Standard for Sustainable Forest Management (see Attachment C). The Tasmanian Division of the Institute believes that the current definition, and permission, of small-scale clearing is appropriate for the revised PNFEP.

Support for sustainable forest management of private native forests

Many of Australia's private native forests are not well managed (see IFA policy 2.2) although some of Tasmania's private native forests have been very well managed for both wood production and conservation. The potential environmental and economic contribution from private forests is often poorly recognised by landowners and the community, which contributes to the continuing attrition, or degradation, of some private native forests in Tasmania. Useful voluntary incentives are now available to those private landowners who wish to wholly protect native forests of particular value.

The Tasmanian Division of the Institute whole-heartedly supports those sections of the existing PNFEP that support sustainable native forest management for wood production. It is largely through this approach that native forest outside of strict reserves will be valued and managed for a variety of uses including wood production, nature conservation and sustainable supply of water and forest carbon stores. It would be useful if these sections could be amplified in the next revision of the PNFEP. This could include information on incentives, education and professional support to private native forest owners that seek to actively pursue sustainable forest management.

View on establishment of roads and other "Routine Management Activities".

The Tasmanian Division of the Institute notes that the current PNFEP clearly states that clearance and conversion of native forest on public and private land for Routine Management Activities is permitted and not limited by statewide or forest community retention levels or property conversion limits (see 4.6 of PNFEP). The most important of these Routine Access Management Activities for sustainable forest management is the establishment of roads (including entirely new roads and those re-activated on old alignments established many decades ago). Section 4.6 is consistent with conversion guidelines in Forest Certification standards, which allow for the establishment of roads and other infrastructure that is ancillary to a forest management plan.

View on a revised PNFEP from 2016.

The implementation of the PNFEP can be substantially simplified by adopting an end-date for broad-scale clearing and conversion of either 1 January 2016 or 30 June 2016. Adoption of such a date would bring to an end a whole suite of complex accounting and reporting processes, which would become redundant. The goal of maintaining a minimum of 95 per cent of the 1996 CRA native forest area could be recognised as having been achieved and maintained through the end of broad-scale clearing and conversion from 2016. This narrative should also report that almost 40 per cent of Tasmania's forests has been cleared since European colonisation.

Much of the text of the existing PNFEP, including definitions of broad and small scale clearing and conversion, is still relevant but sections such as 3.2, 4.2-4.5, 5.2, 7.8 and 8.1 would no longer be relevant.

Finally, the Tasmanian Division of the Institute believes the PNFEP, in its various forms since 2005, has successfully supported Tasmania's approach to achieving ecologically sustainable forest management. It welcomes the opportunity provided Government for public input into the next revision of the PNFEP and would be pleased to offer further advice if required.

Committee
Tasmanian Division of the Institute of Foresters
27 August 2015

Attachment A. Brief description of the Institute of Foresters of Australia

The Institute of Foresters of Australia (IFA) is Australia's only representative body for forestry professionals. Established in 1935, the IFA has over 1100 members engaged in all branches of forest management and conservation in Australia. There are over 100 members in the Tasmanian Division.

The Institute is strongly committed to the principles of sustainable forest management and the processes and practices that translate these principles into outcomes. The membership represents all segments of the forestry profession, including public and private practitioners engaged in many aspects of forestry, nature conservation, resource and land management, research, administration and education. The IFA is registered nationally as a Company Limited by Guarantee operating under a Memorandum of Association and Articles of Association.

The objectives of the Institute are to:

- Advance and protect the cause of forestry
- Maintain a high standard of qualification in persons engaged in the practice of forestry
- Promote professional standards and ethical practice among those engaged in forestry
- Promote social intercourse between persons engaged in forestry
- Publish and make educational, marketing and other materials available to those engaged in forestry
- Provide the services of the Institute to forestry organisations inside Australia and in overseas countries as the Board may deem appropriate.

There are Divisions of the IFA in each State and the Australian Capital Territory, headed by the Divisional Chair and coordinated through volunteer Committees.

Attachment B. A summary of established IFA policy relevant to relating to clearing and conversion of native vegetation.

The IFA has developed and regularly reviews a comprehensive suite of policy statements. These can be viewed at <http://www.forestry.org.au/publications/ifa-policy-statements>.

Although there is no specific policy statement on maintaining a permanent native forest estate, several IFA policy statements are particularly relevant. These include:

- Policy number 1.4 on Timber Production and Biodiversity. This policy recognises that the maintenance of biological diversity is an important component of sustainable forest management and can be achieved in native forests and plantations managed for timber production through the application of scientifically based forest management plans, forest certification standards and Codes of Practice.
- Policy number 1.7 on Conservation of Australia's forests and woodlands. This policy recognises that the key threat to Australia's native forests and woodlands has been conversion to non-forest land uses such as agriculture. Effective conservation of Australia's native forests and woodlands is dependent on sustainable forest management, including incentives, education and professional support to land managers. Specifically the IFA policy indicates that "wherever possible the conversion of native forest and woodlands to other land uses should be avoided.
- Policy number 2.1 on forest certification. This policy notes that independent certification of forest management and timber supply chains are valuable tools to demonstrate sustainability of forest management and forest products, to consumers and the community, and efforts should be enhanced to achieve their full adoption and promotion within the Australian forest industries.
- Policy number 2.2 on management of private native forests. This policy recognises that many of Australia's private native forests are not well managed. The potential environmental and economic contribution from private forests is also poorly recognised by landowners and the community, which contributes to the continuing conversion of private forests to other land uses.
- Policy number of 2.4 on clearing of native forests for plantations [approved in 2003]. This policy states that the development and expansion of plantations requires that sufficient areas of cleared land are available to be planted. Remnant native vegetation may impact negatively on the establishment, growth and management of plantations. However, clearing of substantially intact areas of native vegetation for plantations can threaten regional conservation objectives. Specifically the policy recognises that "clearance of small areas of remnant vegetation that have been identified to have little or no conservation

significance, that are well represented regionally, or that are diseased or degraded, may take place within plantation developments.

- Policy number 2.7 on timber production from native forests. This policy recognises that Codes of practice provide an effective tool to regulate forest management activities, such as timber harvesting and roading. All significant forest activities should be subject to codes of forest practice, irrespective of land tenure, which are effectively implemented, regularly reviewed and audited with public reporting or audit results.

Attachment C. Sections of the Australian Forestry Standard and the draft FSC standard for Australia relating to clearing and conversion of native vegetation.

Australian Forestry Standard. The Australian Standard for Sustainable Forest Management (AS 4708/2013) requires that a certified forest manager shall demonstrate that the enterprise was not directly or indirectly responsible for the conversion of native vegetation to plantations after 31 December 2006, except where conversion operations had commenced prior to that date. Furthermore, no certified forest manager shall convert native vegetation to plantations or non-forest except under very limited circumstance outlined in Criterion 3.9 of the Standard (<http://www.forestrystandard.org.au/resources/standards/AS4708-2013/AS4708-2013-Publish.pdf>). These circumstances include:

- infrastructure development required by the Forest Management Plan [such as roads or dams etc]; or
- the establishment of practical operational units of a plantation, re-alignment of boundaries for subsequent rotations and incorporation of new areas within the defined forest area limited to an area of 5 per cent up to a maximum of 5 hectares of a single forest operation and limited to a total per annum of 5 hectares or 1% of the annual harvest area.

The forest manager shall, in all of these circumstances above:

- ensure that native vegetation conversion occurs only where it does not involve occurrences of Significant Biodiversity Values or areas of native vegetation that are part of recognized offsets; and
- commit to and demonstrate an offset process to effectively balance the environmental outcomes of the native vegetation conversion for relevant environmental values.

Forest Stewardship Council. The FSC does not yet have a national standard for Australia but Draft 2 of the FSC Australia-Forest Stewardship Standard (FSCA-FSS) has been released for public comment until 30 September 2015. FSC standards globally have prohibited certification of native vegetation conversion after November 1994, except under very limited circumstances. Criterion 6.9 of Draft 2 of the FSCA-FSS indicates that a certified organisation shall not convert natural forest to plantations or non-forest land except when the conversion:

- Affects a very limited portion of the area of the Management Unit, and
- Will produce clear, substantial, additional, secure long-term conservation benefits in the Management Unit, and
- Does not damage or threaten High Conservation Values, nor any sites or resources necessary to maintain or enhance those High Conservation Values.