

Tasmanian Regional Forest Agreement Third Five Year Review

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

Key Points

This submission has been prepared on behalf of the IFA Tasmanian Division (IFA Tas).

IFA Tas strongly supports the RFA framework and the five yearly review process as providing a coherent intergovernmental agreement that potentially delivers a holistic long-term policy framework for the management of Tasmania's public and private forest estate, whether those forests are managed primarily for conservation or production.

IFA Tas note that the Governments have stated that this review is strictly related to the third five year period 2008 – 2012 and substantially agree with the assessment of the achievements of both Governments in implementing the very large number of RFA and TCFA commitments. The progress made in these areas underlines the continual improvement in forest management in Tasmania achieved under the RFA and makes a compelling argument for the continuation of the RFA process.

However, there have been significant changes in the forest policy landscape since 2011 that have a very substantial impact on a range of matters pertaining to the RFA and have significantly changed some fundamental data on which the RFA and this Review is based. A number of these matters are identified as needing consideration in the context of extension of the RFA and include: security of future wood supply from public native forests; resourcing of conservation estate management; research capacity to support continuous improvement; the role of government funded plantations in future high quality wood supply from State forest; and, the significant changes in the nature and extent of the wood processing industry and related employment.

Governments should in this review and in the RFA extension remain focussed on maintaining the high levels of forest conservation and sustainable forest management in both the production and conservation estates, on continuous improvement based on research, and development of a coherent strategy to encourage a strong and vibrant forest based industry that provides wealth and employment opportunities to the Tasmanian community.

There are many comments that the IFA Tas could and would like to contribute about the nature and content of the RFA extension. It would be appreciated if the Governments could provide additional information on the extension process and the opportunities to provide input. We urge the Governments to seek an effective mechanism to minimise changes to the key terms of the extended RFA whilst providing capacity for continuous improvement.

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 which 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 'Objects' of the Institute are:

- To advance and protect the cause of forestry
- To maintain a high standard of qualification in persons engaged in the practice of forestry
- To promote professional standards and ethical practice among those engaged in forestry
- To promote social intercourse between persons engaged in forestry
- To publish and make educational, marketing and other materials available to those engaged in forestry
- To 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.

IFA policy on Regional Forest Agreements (RFA)

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>.

As can be seen from these policies, the IFA advocates similar principles and policies for the management of Australia's forests and its forest-based industries as those contained in the objectives and actions in the RFAs.

Although there is no specific policy statement on Regional Forest Agreements, Policy number 2.10 on the National Forest Policy Statement is particularly relevant. In this Policy the IFA articulates its support for RFAs, in particular the IFA advocates maintaining a contemporary, holistic National Forest Policy Statement (NFPS) to provide strategic national long-term directions for the management of Australia's forests and for Australian forest industries.

The IFA supports consideration of the following issues as part of the revision of the NFPS:

- the need for active management to sustain the values associated with native forests of all tenures;
- the need to extend the principles of the Regional Forest Agreements to other forests, and through ongoing review and renewal at the end of their 20 year life;
- the need to enhance the role of all forests on all tenures in delivering ecosystem services.
- the role of forests and forest products in climate change mitigation strategies, and of plantation forests in delivering ecosystem services, deserve particular attention;
- the need to strengthen implementation of the National Indigenous Forestry Strategy;
- The need to develop enhanced regulatory and reporting systems to support sustainable forest management. Regulatory systems should be outcomes-based and apply across all tenures, and be supported by forest certification systems;
- the need to build and sustain capacity for sustainable forest management, and innovation in the forests and forest products sector.

Third Five Year Review of the Tasmanian RFA

This submission has been prepared on behalf of the IFA Tasmanian Division (IFA Tas) by a committee of members who have had considerable experience in the development implementation and review of the Tasmanian RFA from the perspective of government, industry, and the private sector.

IFA Tas strongly supports the RFA framework and the five yearly review process as providing a coherent intergovernmental agreement that potentially delivers a holistic long-term policy framework for the management of Tasmania's public and private forest estate, whether those forests are managed primarily for conservation or production. We consider that the RFA has for the most part delivered on the governments' objectives and, as can be seen by the review documentation, has particularly delivered substantial improvement in forest protection and management. In particular it is pleasing to see that implementation of many of the 2007 Review recommendations has either been completed or substantially progressed. This continued commitment to implementation of the RFA and the outcomes of the previous reviews demonstrates the effectiveness of the RFA process and framework in delivering agreed continuous improvements to forest management on Tasmania.

The IFA Tas emphasised the critical importance of maintaining a joint and bipartisan commitment to the RFA process to the long term success in meeting the objectives of the RFA. This includes adherence to regular five-yearly reviews of Implementation. In saying this, we are concerned that both the Australian and Tasmanian governments have not always demonstrated this commitment and adherence.

In the period from 2009 through to 2013, the Australian and Tasmanian governments abrogated their forestry policy responsibilities agreed under the RFA framework and referred them to NGO and industry stakeholders to make forest policy and public land decisions. This period saw claims of high conservation value being attributed to large forest areas. Such claims were never properly assessed against nationally agreed reserve criteria or criteria recognised by international forest certification bodies. The process also overlooked a range of regional and community stakeholders with legitimate interests in the use and management of forest lands other than those represented by ENGOs and industry, resulting in significant community opposition.

The lack of government commitment to the RFA process and recognition of the very significant achievements in sustainable forest management of public native forest must surely have undermined confidence of potential investors in forest processing as well as potential customers in international markets.

We note that the Governments have stated that this review is strictly related to the third five year period 2008 – 2012. Hence, the information provided is mostly on the period up to 2011. Whilst the IFA Tas supports the need to maintain a consistent five year review framework and appreciate the factors that have led to a delay in this Review, it is unfortunate that this review has commenced a full three years after its due date. As stated in the Summary Report, there have been significant changes in the forest policy landscape since 2011 that have a very substantial impact on a range of matters pertaining to the RFA and have significantly changed some fundamental data on which the RFA and this Review is based. These factors include a much larger CAR reserve system, a much smaller public production forests estate and hence smaller sustainable native species sawlog yield, significant reductions in scale and diversity of the wood processing sector with consequent severe changes to social and economic outcomes such as employment, value and investment. Such changes, which largely resulted from processes outside of the RFA framework, are considered to

have a significant bearing on any judgement about the long term success of implementation of the RFA and must be considered by Governments and stakeholders in finalising an extension of the RFA.

Due to the importance of this review in terms of the proposed extension of the RFA and the need to provide certainty on the future arrangements for an extended RFA, as found in the report on the 2007 Review and the Governments' response, the IFA Tas considers that this review should have been commenced much earlier.

The IFA Tas makes the following comments in relation to the report *Implementation of the Tasmanian Regional Forest Agreement 2007- 2012*:

We note that Tasmania is (again) the first State to commence this third five year review. We substantially agree with the assessment of the achievements of both Governments in implementing the very large number of RFA and TCFA commitments. The report provides very comprehensive details of progress made over the last 15 years. Officials of both governments who prepared this and previous reports should be congratulated on the amount and quality of information provided for the public record. It was no doubt a very onerous and time consuming task.

These substantial achievements have resulted in highly advanced forest management systems in Tasmania which compare favourably with those operating anywhere in the world. In particular, the following advances are highlighted:

- The management of threatened species including improved knowledge, the delivery of improved management prescriptions, and the production of recovery plans and listing statements;
- Tasmania's scientifically-based CAR reserve system has been significantly strengthened through new reserves that deliver protection of virtually all forest communities, old growth forest and wilderness well in excess of the minimum National Reserve System criteria;
- Continuous improvement of forest practices across the State, both in the production and conservation estates. An even stronger Forest Practices System has been developed that has been independently assessed as being an international best practice system;
- Significantly increased area of hardwood plantation with a much improved knowledge of Intensive forest management science;
- The use of the chemical 1080 for browsing control has been discontinued and substantial progress has been made in developing integrated browsing control systems;
- Broad scale clearing and conversion of native forest on public land has been phased out and the overall cap on clearing and conversion of native forest on public and private land to retain 95% of the 1996 area has been implemented.

The progress made in these areas underlines the continual improvement in forest management in Tasmania achieved under the RFA/TCFA agreements and makes a compelling argument for the continuation of the RFA system.

We also note that there are relatively few commitments that have not been completed (as at 2012). Some of these are relatively unimportant, some are best addressed in any RFA extension agreement and some are beyond the complete control of governments. However, a couple deserve specific comment.

- In view of the very large conservation estate in Tasmania it is somewhat disappointing that the Parks and Wildlife Service still does not have an independently audited Environmental Management System (RFA clause 93 and 2007 Review rec 25) although internal systems

have been developed towards this end. Nor does it have publicly reported audit compliance against the reserve code of practice (RFA clause 94 and 2007 review rec 10). The importance and expectation of professional land management of conservation reserves has increased significantly over the course of the RFA and it is important that the public can have confidence that appropriate management systems are in place and are being regularly monitored.

- Many conservation reserves still do not have management plans in place, including one national park (RFA attachment 10.13).

Related to both of these is the issue of adequate resourcing of the management of the conservation estate (2007 Review rec. 9). Subsequent to 2012 there has been a substantial further increase in the conservation estate with the expansion of the World Heritage Area. It is of the upmost importance that both Governments commit to long term secure and adequate funding of the Tasmanian reserve system to ensure that the values for which they have been set aside are well managed and protected particularly from the increased pressures of rising visitation, and climate change with its impacts on fire, pests and diseases and threatened species habitat.

We also note that while the report against some commitments was correct in 2012, a review based on current knowledge may present a different outcome. A specific example is RFA clauses 40-42 concerning World Heritage values. We note that the process followed by both Governments to expand the Tasmanian Wilderness World Heritage Area in 2013 in several respects did not follow the process as set out in the RFA.

Similarly, the resources available within both governments to forest research and development have declined dramatically since 2012. The RFA correctly emphasised the importance of maintaining and increasing the research effort across a range of priority areas to maintain the capacity for improved forest and species management. This is a critical issue that needs attention in any extension of the RFA. The IFA Tas is particularly concerned that the important long term forest research including in the key area of forest response to climate change, conducted at the Warra Long Term Ecological Research site is at risk of not being maintained due to the lack of resourcing from both governments and the recent changes to Forestry Tasmania.

The Implementation Report would be more useful if it had been delivered in 2012 as per the RFA timetable. It is particularly important that the timing of five-yearly review of Sustainable Yield from the public wood production forests is done so that it can be included in the 5-yearly State of the Forests Report and the Implementation Report. Hence a clear timetable and fixed deadlines for the next Sustainable Yield Review, State of the Forest Report and Implementation Report should be agreed by all relevant parties. This will need to include Forestry Tasmania, which prepares the 5-yearly Sustainable Yield Review, and the Forest Practices Authority, which prepares the State of the Forests Report, as well as State and Federal Government departments.

Another important matter that has arisen post the 2012 Review that needs to be considered in the extension is that of the hardwood plantations on State forest that were established and funded under the RFA and TCFA. These plantations were specifically established to maintain the high-quality eucalypt sawlog resource at the then sustainable level of 300,000 cubic metres a year to offset the native forest resource foregone within the new conservation reserves created under the RFA and TCFA. These plantations now form an even more significant element of the remaining eucalypt sawlog resource available after the expansion of the reserve system under the Tasmanian Forest Agreement. The Tasmanian Government has recently announced that it has asked Forestry Tasmania to investigate the sale of public eucalypt plantations, of which the RFA/TCFA funded

plantations form a very large proportion. The sale of these plantations could have a very significant impact on the future public wood supply and the potential for future industry development. It would undermine the current sustainable yield strategy and put third party forest certification at risk without further reductions in sawlog yield. This will inevitably further undermine the viability of native forest management in Tasmania. This is a critical issue that must be carefully considered in framing the RFA extension.

The IFA Tas has significant concerns regarding the long term future of productive native forest management if the eucalypt plantations, specifically funded under the RFA to support long term sawlog production, are sold to private interests and as a result are liquidated (woodchipped) in the short-term for pulpwood.

Extension of the RFA

The IFA Tas note the stated intent of both Governments to extend the Tasmanian RFA after receiving the review report from Dr Kile. The IFA Tas supports the notion of a 20 year rolling life for the RFA based on successful completion of each review. We are concerned however, that this does not result in effectively a period of only five years of certainty, as potentially each review could result in a renegotiation of the terms of the RFA. We urge the Governments to seek an effective mechanism to minimise changes to the key terms of the RFA whilst providing capacity for continuous improvement.

It is also noted in the Summary Document that in extending the RFA the Governments intend to “maintain the existing Comprehensive, Adequate and Representative forest reserve system”. It is not clear what is precisely meant by “maintaining” and “current” in this context and should be further clarified. It is assumed that this refers to the extent of the reserve system, not operational maintenance.

However, “current” could mean May 2015 or it could mean as at 2012, the reference date of this review. As mentioned previously, there has been a considerable expansion of the Tasmanian CAR reserve system since 2012 under the Tasmanian Forest Agreement process and outside of the terms of the RFA. This expansion, at the expense of the wood production estate, is not subject to this current Review. It could be argued that the post 2012 expansion was not necessary for meeting the conservation objectives of the RFA and certainly was inconsistent with the economic objectives of the RFA and its relevant Employment and Industry Development Strategy. Indeed both current Commonwealth and State governments came into power with policies of “winding back” some of these additional reserves.

The current RFA does allow for minor changes to the areal extent of informal reserves and this should be maintained in the RFA extension. However, as history has shown on several occasions both in Tasmania and other RFA regions, Governments can and do make changes to the RFA despite commitments contained in the RFA. Sometimes these are for good reasons based on new scientific information, but more often than not based on populist political reasons. The IFA Tas encourages the governments to develop mechanisms within the extended RFA that restores long term certainty to the resource base which is so vital in attracting investment and maintaining/growing employment.

There are many comments that the IFA Tas could and would like to contribute about the nature and content of the RFA extension but is difficult to do so at this stage without more information about what the Governments’ intentions are. It would be appreciated if the Governments could provide additional information on the extension process and the opportunities to provide input.

One specific comment at this stage is to urge that the extension RFA be a much shorter document with fewer future commitments and milestones focussed at a high strategic level. The great majority of the very large number of commitments arising from the RFA, TCFA and previous reviews are no longer required as they were largely about bringing the reserve system and the forest management system up to a consistent level that met the national criteria. These improvements have nearly all been attained and there is no demonstrated need to lift the bar even higher. Governments should in this review and in the RFA extension remain focussed on maintaining the high levels of forest conservation and sustainable forest management in both the production and conservation estates, on continuous improvement based on research, and development of a coherent strategy to encourage a strong and vibrant forest based industry that provides wealth and employment opportunities to the Tasmanian community.

The IFA Tas is aware of the enormous effort and cost of implementing and reporting on the very large number of commitments in the existing RFA. In the current context of a much reduced public sector and available funding, Governments should consider the resource impacts and capability carefully in developing the RFA extension and ensure that only those commitments of sufficient strategic importance are included.

The IFA Tas hopes that these comments are useful to the Governments and the Reviewer. We would be pleased to provide any clarification or further information or comment. Please contact the Committee convener Mr Andrew Blakesley by email if required.

Yours sincerely

Bob Gordon

Chairperson, Tasmanian Division of the Institute of Foresters of Australia

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