



tasmanian conservation trust inc

Tasmanian PNFE Review
Department of State Growth
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Submission to the review of the Tasmanian Permanent Native Forest Estate Policy

The Tasmanian Conservation Trust (TCT) welcomes the opportunity to make a submission to the review of the December 2014 Tasmanian Permanent Native Forest Estate Policy (PNFE Policy).

Inconsistency between the PNFE policy and the RFA

We note that the 2005 Supplementary Tasmanian Regional Forest Agreement (STRFA) still includes a commitment in clause 45 to cease broad-scale clearing of native forest on private land by 13 May 2015, but this commitment is not mentioned in the 'Call for submissions' discussion paper or the December 2014 PNFE Policy. If there is to be a revision of the deadline for clearing, then this should be done as a part of the revision of the Tasmanian Regional Forest Agreement (RFA) that is scheduled to commence in 2016.

Recommendation: The TCT recommends that the state government not persist with the review of the PNFE Policy but that it should be done following the review of the Tasmanian RFA. To ensure consistency with the STRFA the December 2014 PNFE Policy should be withdrawn and replaced with the September 2011 PNFE Policy until the RFA review is concluded.

Comments on the statewide retention levels and timeframe for ceasing broad-scale clearing

Assuming that the State government persists with the December 2014 PNFE Policy and the review of it, we wish to provide the following comments on it.

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The TCT's submission is focused on the statewide retention levels and timeframe for ceasing broad-scale clearing and conversion of native forest on private land.

Recommendation: The Tasmanian Government must commit to cease broad-scale clearing and conversion of native forests on private land by 1 January 2016 (or an earlier date) and to retain native forest area at 95% of 1996 levels. These commitments must be incorporated into a revised PNFE Policy and this revised version be released for further public input.

As stated, the 2005 STRFA set a target of phasing out broad-scale clearing and conversion of native forest on private land over a ten year period. It also established a cap on clearing or conversion of native forest on both public and private land by committing to retaining 95% of the 1996 CRA native forest area. Since 2005, the various versions of the PNFE Policy have all maintained a commitment to delivering these goals, with the deadline for private land brought forward to 1 January 2015 (for reasons that have never been publically explained).

For more than ten years the Tasmanian and Australian Governments have maintained a commitment to the STRFA goal of ceasing clearing on private land by 2015. Private landowners and the broader Tasmanian community have all expected that clearing would cease in 2015. Measures were put in place to moderate the impacts of the approaching deadline and clearing limits, including the annual property limits. Through numerous revisions of the policy there has not been any consideration for changing this critical goal.

The Tasmanian Government amended the PNFE Policy in December 2014 to extend the deadline for ceasing clearing on private land by 12 months, specifically to allow for review of the policy. While we did not support this extension, it is most important that further extensions are not granted.

It is vital that the Tasmanian Government sticks to the long-held commitment established in the 2005 STRFA to cease broad-scale clearing on private land.

If further extensions to this deadline are granted or the statewide retention levels are changed it would seriously damage the credibility of the Tasmanian RFA. If governments were to renege on a long-term commitment for no apparent reason, it would threaten their commitment to sustainable forest management but also diminish the importance or credibility of other commitments made in the existing or future RFAs.

If the target and deadlines are to be extended then this can only legitimately be done on the basis of a transparent re-evaluation of the science of ecological sustainable forest management. The discussion paper provides no such scientific re-evaluation, nor does it refer to any science that might lead to such a re-evaluation. In the absence of any scientific arguments to the contrary the commitment to ceasing clearing must be upheld.

Other elements of the PNFE Policy

In the absence of a commitment from the Tasmanian Government to a deadline for ceasing clearing, we find it very difficult to provide a response to the other important elements of the PNFE Policy. For example, if the

government revises the PNFE Policy to include a much longer timeframe for ceasing clearing or greatly reduces the statewide retention levels, our response to the elements of the policy that relate to how this goal is delivered would naturally vary.

We are further discouraged from making detailed comments regarding the policy by the question in the discussion paper asking whether the "policy is still required?". Why would we comment on a policy if the state government is considering not having one?

The discussion paper further asks "...are the current settings and thresholds in the PNFE appropriate today?" This is totally inappropriate without providing detailed background information regarding the importance of limits on clearing and its central role in sustainable forest management. The discussion paper should have explained why the Australian and Tasmanian Governments maintained a commitment to ceasing clearing for more than ten years and then asked respondents whether anything has changed.

Once the Tasmanian Government has made a commitment to the statewide retention levels and a deadline for ceasing broad-scale clearing, the TCT would welcome an opportunity to comment on the other elements of PNFE Policy, including:

- administration of applications for clearing and conversion through the forest practices system;
- methods for minimising the impacts of clearing during the period until broad-scale clearing and conversion ceases, including through property limits of 40 hectares per year and native vegetation community retention levels;
- exercise of discretion in approving the conversion of native forest or threatened native vegetation communities;
- provision for clearing of native vegetation that is not broad-scale clearing.

Yours sincerely



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