



TASMANIAN FARMERS & GRAZIERS ASSOCIATION

Tasmanian Permanent Native Forest Estate Policy Review
Department of State Growth
Tasmanian Government
Hobart TAS 7001

Via email: Review.RFA@stategrowth.tas.gov.au

TFGA Submission – Review of the Tasmanian Permanent Native Forest Estate Policy

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

The total Tasmania gross state product (GSP) was \$23.9 billion for the 2012 year. The GVP of agriculture, forestry and fishing collectively amounted to almost 9% of this total – before input supply services and value-adding, which is well above that for the nation as a whole.

Tasmania is blessed with a vibrant and diverse food and agricultural sector, as the figures show it is a key contributor to the state's economy. The sector is well placed for further growth, underpinned by substantial public and private investment in unlocking some of the state's natural resources, including water and soil.

The sustainability of our forests is of interest to us all, but it is of particular concern for the timber and forest products industry and those it employs. As a form of land-use, forestry has a very large footprint, occupying over 50% of the State's land mass.

The TFGA appreciates the opportunity to comment on the review of the Tasmanian Permanent Native Forest Estate Policy (Policy) and provides the following commentary to this important review.

Yours sincerely

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Tasmanian Reserve Estate

The Tasmanian Reserve Estate spatial layer as at 30 June 2014 indicates a total reserved area of 3,603,200 hectares, including formal and informal reserves on public land, reserves on private land, and Marine Protected Areas (MPAs). The terrestrial reserved area is 3,414,000 hectares, or 50.1% of the area of Tasmania. The reserves within areas covered by Forest Practices Plans (FPPs) are not included in these figures but are estimated to be around 20% of areas covered by FPPs.

In 2011, there were approximately 3.4M ha of native forests in Tasmania, comprised mainly of Eucalypt medium woodland (approximately 1M ha), Eucalypt tall open (829,000 ha), rainforest (708,400 ha) and Eucalypt tall woodland (261,000 ha) forest types. The majority of the native forests in nature conservation reserves (approx. 1.2M ha), 875,000 ha are privately managed and 923,200 ha are multiple use public forest available for timber production.

Between 2006 and 2011, there was a 73% increase in the area of private forests in CAR reserves, from 48,000 to 83,000 ha. Private landowners are managing native forestry sustainably, which is clearly shown with the increase of area under CAR reserves on private land.

The TFGA supports the triple bottom line approach for managing a sustainable forestry industry – social, economic and environmental outcomes.

The TFGA see a need to have a policy for maintaining a permanent native forest estate, but don't agree with the explicit criteria - retention levels can't exceed 95 percent of the 1996 CRA native forest area – as private landowners have and are increasing the area of private forest under the CAR reserve system.

Not only do private landowners have native forests under regulated reserve, but they are also increasing areas of native forest on private land voluntarily. This is through areas planted for wind breaks, corner paddocks (due to changed paddock structure from pivot infrastructure) and environmental plantings (streamside, biodiversity).

Instead of putting a subjective figure within this Policy the government should consider removing it and consider any broad scale clearing applications on a case by case basis using the objectives as a guiding measure. As stated in the Policy, the objectives are:

Tasmania will maintain a Permanent Forest Estate that comprises areas of native forest managed on a sustainable basis both within formal reserves and within multiple-use forests across public and private land in order to –

- i) Maintain and sustainably manage Tasmania's native forest resource base and associated economic, nature conservation, ecosystem services, scenic, cultural and amenity values;*
- ii) Ensure that the conservation status of forest communities is maintained or enhanced;*
- iii) Provide for the reasonable aspirations of the Tasmanian community for sustainable economic development; and*
- iv) Ensure 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.*

Permanent Native Forest Estate Policy (Policy)

The Policy as it stands needs revising to become current and streamlined. Comments to the current Policy:

1. Objectives
 - Maintain this section as it is clear the objectives provide the basis for the Policy and we want these to be the overarching guide for any future applications for clearance and conversion on private land
2. Statewide retention levels
 - Remove this section
3. Native Vegetation Community retention levels
 - This is background information that could be an appendix or removed completely from the Policy
4. Clearing and conversion of Native Forest on public and private land
 - Maintain this section with the below changes
 - Section 4.3 to be removed
 - Sections 4.4 and 4.5 to be reworded to state that broadscale clearing and conversion on private land to be considered on a case by case basis
5. Biodiversity, water quality and salinity
 - This is background information that could be an appendix or removed completely from the Policy
6. Exercise of discretion in approving the conversion of Native Forest or Threatened Native Vegetable Communities
 - Maintain this section
7. Implementation and Reporting
 - Maintain this section
8. Review of the Policy
 - Maintain review in line with the five yearly reviews of the Tasmanian RFA

Public Interest

Over half of Tasmania's 6.84 million hectares is under conservation reserves. This means as a state we have vast areas of land and forest to manage with less resources that also add to the problem for neighbouring landowners.

It needs to be pointed out to the broader community that simply locking up land and assuming that somehow it will revert to its natural state is a misconception. Without proper management of weeds and wildlife, and without the development of appropriate measures to manage fires, conservation areas simply become havens for pests and infernos.

But the public also need to realise that native forests on private land can't be just put into reserve without the need to assist the landowner during and in perpetuity of that forest. Put simply, if the public want native forests placed into reserve or similarly to protect a threatened species within that native forest there needs to be a process where landowners are appropriately compensated or rewarded for continued stewardship.

There is also a lack of public realisation that the active management of all our native forests, private and State owned, has contributed significantly to the well-being of all Tasmanians in the past in ways that many in the community don't appreciate (forest products – wood, honey, water; recreation – drives in the forest, bush walking and other active recreation pursuits; employment; wealth generation; environmental protection – control of weeds, pests, wild fire) because these forests have a commercial value.

Time for Change

As an industry we need to accept that there is a need to update our forestry industry operating model and acknowledge that the old model is out of date and needs updating and rejuvenating but that this must be done without destroying the opportunities that the sustainable, commercial management of our native forest estate can continue to realise for Tasmania.

Farmers are often subject to regulations that impose significant forest management and conservation restrictions, which have increased costs and reduced the working capital value of farms. While obligated to adhere to legislative restrictions, the ongoing management of these values are largely voluntary and requires the good will of the land manager to fund conservation through commercial activities, which include wood harvesting.

Farmers should not be expected to manage their assets for community outcomes, unless the community contributes. There is a clear indication that most forest owners can only afford to maintain biodiversity values within forests that also provide some level of commercial return. The destruction of capital value within forests is likely to remove incentives to maintain such services. This is likely to increase the rate of degradation within such forests through increased weed infestation, increased fire regimes, cessation of 'policing' in regards to firewood collection, hunting or other recreational activities.

Enclosed in the Forest Practices Authority 2013-14 Annual Report it states the following:

The FPA's interpretation of the role of the forest practices system in this new legislative environment is articulated in a policy statement 'Guiding policy for the operation of the Forest Practices Code', which the FPA released in December 2013.

The policy contains two key principles:

- 1. The long-term conservation of environmental and social values should be principally achieved through:
 - the maintenance of the permanent native forest estate*
 - a reserve system that is comprehensive, adequate and representative.**
- 2. Forests outside of reserves (private and PTPZL) should make a reasonable contribution to the conservation of environmental values through a prescribed duty of care under the Forest Practices Code.*

The TFGA agree with the FPA's statement on the basis that the government acknowledge the conservation efforts of private landowners in maintaining a permanent native forest estate, under a regulatory and non-regulatory framework.

The TFGA see a need to have a Policy for maintaining a permanent native forest estate on the basis that private landowners have regulatory and voluntary options to manage and use their land and forests for their own social, economic and environmental purposes.

The development of property based vegetation management plans could create a solution where an accredited plan would allow the landowner to comply with vegetation management obligations for all on farm activities. TFGA would be more than willing to assist in developing this process with government.

We see the review as an opportunity for a simplification of the requirements and interpretation of native vegetation policy concerning private land.