



Forest Industries Association  
of Tasmania

8 March 2006

Special Projects – Resource Management and Conservation  
DPIWE  
GPO Box 44  
Hobart, TAS. 7001

Dear Sirs,

**RE: Threatened Non-Forest Vegetation Communities**

FIAT appreciate the opportunity to comment on the proposed legislative changes to implement the protection measures for threatened non-forest vegetation communities as outlined in the Tasmanian Community Forest Agreement 2005. I apologise for the lateness of this input however we have been inundated by a number of pressing issues of late.

The proposed legislative changes, restricting clearance and conversion of threatened non-forest communities, in principle, is unlikely to have an impact on forestry operations as these vegetation communities are currently restricted from conversion under the interim moratorium imposed by the Forest Practices Authority following the Natural Heritage Trust (NHT) Bilateral Agreement, 2003. This statement should not however be construed that this issue is without concern to Tasmania's forest industry.

The proposed implementation mechanism for the revised legislative provisions is very concerning - i.e. incorporation of responsibility for management of the non-forest vegetation communities into the existing forest practices system. The justification for this direction seems to be primarily that this option is cost effective in the short term.

This will mean that a limitation that applies almost exclusively to agricultural practices will need to be regulated by an already overburdened and under resourced Forest Practices Authority, and by specialists without expertise in agriculture. Although there is provision within the proposal for an additional of 3.5 staff and some additional \$280,000 pa, it would be expected that existing specialist staff would be involved in the decision making processes given the paucity of properly qualified personnel to fill these roles, as a Forest Practices Plan would be required for clearance.

The Forest Practices Code is specifically designed for forestry operations not agriculture, therefore significant alteration to a Forest Practices Plan would be required for this new additional responsibility of the Forest Practices Authority (meaning use of resources).

A significant and unanswered question would be is how a Forest Practices Plan would work for agriculture as the Forest Practices Code is a forest management Code of Practice, and is not designed for agriculture. FIAT Members have advised that the proposed changes appear to be written with little or no expertise in using the Forest Practices Code in a practical sense and have appear to have no understanding of the principles of its application.

FIAT's primary concern revolves around the basic question of whether or not the Forest Practices Authority will be fully resource to whatever extent is necessary with additional specialists, and additional Forest Practices Officers specifically trained to assess/approve plans for purely non-forest vegetation communities. The important point for FIAT here is that the forest industry does not wish to not end up paying extra money to fund these changes. Given the concern that attaches to the existing fee structure that significantly funds the Forest Practices Authority and the fact that it is not adequately providing a satisfactory level of service to the industry to cover current services, surely the addition of greater work loads and additional responsibilities will exacerbate the current level of dissatisfaction! In short the forest industry believes it will be required to fund the implementation of these changes by default through a lower level of service or by additional charges being imposed "due to a need for higher levels of service" being required.

FIAT believe that DPIWE should provide its own Forest Practices Officers for this service where the non-forest vegetation is stand alone, i.e. it is not included in an area under a forest industry Forest Practices Plan.

We understand that DPIWE currently has a non-forest vegetation group and a recently formed Conservation Assessment Policy Planning Branch whose responsibility it is to, at least in part, assess dam and subdivision proposals. It appears that a better option for the management of non-forest vegetation may preferably be through these bodies rather than the Forest Practices Authority given existing levels of expertise and perhaps using mechanisms similar to those applying to dams approvals that require approval of forest vegetation clearance

The changes enacted to the Forest Practices Authority and the management arrangements associated with those changes, including the introduction of a fee on the lodgement and approval of a Forest Practices Plan has created considerable angst within industry and considerable additional work requirements on Forest Practices Officers employed with private companies and the Specialist staff within the Forest Practices Authority. These additional work loads in conjunction with the loss of a number of key staff within the Forest Practices Authority have created an unacceptable service standard situation to develop such that industry is completely dissatisfied with the current situation.

That industry have been advised to engage consultants to evaluate special values encapsulated within a Forest Practices Plan area has only served to exacerbate the ill-feeling from industry. We feel the proposed non-forest vegetation management proposal recommended by DPIWE will only exacerbate an already unacceptable situation to the detriment of the forest industry that is substantially funding the operations of the Forest Practices Authority.

We once again thank you for this opportunity to comment on the proposed legislative changes and the associated documents. Should you wish to clarify any issue or discuss any matter raised herein please contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Terry Edwards', with a stylized flourish at the end.

Terry Edwards  
Chief Executive