



**Forest Industries Association of Tasmania Submission to:**

**CPET's Assessment of PEFC National Schemes to Confirm Implementation of Changes  
– Australian Forest Certification Scheme.**

**INTRODUCTION**

The Forest Industries Association of Tasmania (FIAT) is an industry association formed in 1983 to represent the interests of processors of Tasmanian forest products. Our members' activities are diverse and include the production of veneers, hardwood and softwood timber, pulp and paper, woodchip production and both plantation and native forest management.

FIAT's 18 member businesses include all of the State's larger processors of forest products, including a significant proportion of the crown sawlog output, as well as all of the veneer produced in the State. FIAT Members' activities account for more than 75% of the gross value of production in the forest and wood products industry in Tasmania.

Our membership includes all of the larger private sector plantation development Companies in Tasmania with an estimated estate totaling over 130,000 hectares and significant areas of privately owned native forest.

**SCOPE OF SUBMISSION**

We intend in this submission to provide information to assist CPET satisfy itself as to the compliance of the Australian Forestry Standard with the assessments currently being undertaken and specifically those requirements conveyed to PEFC as requirements by CPET.

We will also take this opportunity to provide an overview of some of the key elements of sustainable forest management in Tasmania this background is provided against the campaign by some ENGO's within the UK which seeks to discredit the Tasmanian forest industry for reasons related more to their political aspirations than any genuine critique of the sustainable nature of forestry within Tasmania.

**THE AUSTRALIAN FORESTRY STANDARD - ADDRESSING THE REQUIREMENTS OF CPET**

**Criteria 1.3.3 Process for Standard setting**

The process used to develop the sustainable forestry standard was accredited by Standards Australia, Australia's independent standard setting organisation.

The content of the Standard was determined by a technical reference committee representing independent professional and scientific experts, forest owners and industries, community and consumer interest groups, and public forest agencies and regulatory bodies. The development

of the AFS was open to all stakeholders, including environmental NGO's. Unfortunately the representation from the person endorsed by a number native forest conservation groups and World Wildlife Fund participated in the development but withdrew near the completion of the technical content of the Standard. They attended Meetings # 3, 4, 5 , 6, were apologies for meetings # 2, 7, 8 and 9 and they gave notice of their withdrawal at meeting #10. There were 11 Technical Reference Meetings in all.

The Standard was developed over 2 years, including multiple rounds of consultation.

The AFS uses credible frameworks, such as:

- The environmental management standards of the International Standardisation Organisation; and
- The criteria of the international 'Montreal Process' for sustainable forest management.

Given its status as an accredited Standards Development Organisation, the AFS Ltd developed documentation of its standard setting procedures which is available on the PEFC website and can be accessed on the link titled "The Australian Forestry Standard Record of Process". FIAT contend that this documentation in concert with the discussion above concerning ENGO participation clearly demonstrates the AFS compliance with CPET criteria 1.3.3.

#### **Criteria 2.4 Consultation during the audit process**

FIAT understand that the requirement to consult to ensure that the audit evidence is inclusive of the views of external parties has been incorporated into the JAS-ANZ Australian Forestry Standard accreditation program and specifically Procedure 26-General Requirements for Bodies Operating Assessment and Certification of Forest Management Systems.

This Procedure has been recently updated by JAS-ANZ which is the only body accredited to certify under the AFS and Issue 2 of Procedure 26 contains provisions which we contend demonstrate compliance with CPET criteria 2.4.

#### **Criteria 2.5 Provision of publicly available information on the audit results.**

In the same update of Procedure 26 mentioned above provision was made for the requirement that summary reports produced by certification bodies are to be made publicly available by certified organisations. FIAT contend this inclusion satisfies the requirements of CPET criteria 2.5.

## **OVERVIEW OF TASMANIAN FOREST INDUSTRY**

### **Forest regulation in Tasmania**

Tasmania's forestry industry acts within a number of strictly enforced Government regulations including the following: -

- **Regional Forest Agreement**

The Tasmanian Regional Forest Agreement was reached in 1997 between the Australian Government and the Tasmanian Government and includes the following objectives: -

The State and the Commonwealth have agreed to establish a framework for the management and use of Tasmanian forests which seeks to implement effective conservation, forest management, forest industry practices and in particular:

- Provide certainty for conservation of environment and heritage values through the establishment of a Comprehensive Adequate and Representative Reserve System; and
- Provide for the ecologically sustainable management and use of forests in Tasmania;

This Agreement has been made having regard to studies and projects carried out in relation to all of the following matters relevant to the Tasmanian Region –

- (a) environmental values, including old growth, wilderness, endangered species, national estate values and world heritage values;
- (b) indigenous heritage values;
- (c) economic values of forested areas and forest industries;
- (d) social values (including community needs);
- (e) principles of ecologically sustainable management.

(Source: Regional Forest Agreement 8 November 1997)

This agreement expresses the clear support of the Australian and State Governments for the forestry industry in Tasmania. Any product sourced in accordance with this agreement will have been obtained legally and in accordance with the principles of ecologically sustainable forest management.

- **Tasmanian Community Forest Agreement**

In the election of a new Federal Government for Australia in October of 2004 the Prime Minister announced a new policy position in respect to the forest industry in Tasmania. This policy was by way of a supplement for the Regional Forest Agreement. Following detailed negotiation between the Federal and State Governments following that election a new Agreement known as the Tasmanian Community Forest Agreement (TCFA) was reached.

The TCFA includes the following key issues: -

Expansion of the forest reserve system by 170,000 hectares with particular emphasis on old growth forests and rainforest increasing the reservation of these forest communities to a total in excess of 1 million hectares;

Substantially curtailing the use of clear fall logging in old growth forests to be replaced by a new silviculture known as Variable Retention;

Providing assistance to forest products industry processors to move towards a greater reliance on plantation sourced wood;

Commitment to phase out broad scale clearing and conversion of native forests.

This agreement confirms the support of the Federal and State Government's for Tasmania's forest industry whilst further enhancing conservation values and biodiversity. Wood sourced from Tasmania carries the approval of both Governments and is therefore free of any contention in respect to legality.

- **Forest practices system including criteria to be assessed prior to logging**

In addition to the Regional Forest Agreement criteria the Tasmanian forest industry operates under a rigid and exacting Code that has legislative backing. The Forest Practices Code is developed by a representative body with technical backgrounds to ensure that the Code is capable of on-ground implementation.

In the planning process prior to any harvesting operation the Code requires that a specially trained person, a Forest Practices Officer, prepare a detailed Forest Practices Plan that analyses the proposed harvest area for a range of specific special values ie :-

- Fauna
- Flora
- Soil and Water
- Geomorphology
- Visual and Landscape
- Cultural Heritage

Any coupe (harvesting area) that contains identified special values is required to be assessed by an independent employee of the Forest Practices Authority who may place restrictions on access to all or part of a coupe or may require particular prescriptions to protect the identified special value. A Forest Practices Plan is enforceable and an independent audit of compliance with a plan is carried out by staff authorised by the Forest Practices Authority.

The Forest Practices system in Tasmania is an extremely rigorous and tightly controlled process that is designed to ensure the protection of rare, vulnerable or endangered species by providing a balance between the economic, social and environmental requirements of the State.

### **Level of reservation in Tasmania**

Tasmania has one of the highest levels of reservation anywhere in the world and considerably in advance of internationally recognised benchmarks and criteria.

Tasmania is an island that is comprised of a total of 6.8 million hectares of which 3.2 million hectares (47%) is forest (source Sustainability Indicators for Tasmanian Forests).

Of the 6.8 million hectares land mass of Tasmania, almost 2.9 million hectares (43%) are in secure reserves for the preservation of biodiversity and other conservation values. This conservation area is likely to be considerably understated as it does not include extensive

areas of land managed for conservation by private landowners for which data is not readily available. As an example of this reservation that is not part of the formal reporting processes Gunns Limited (an AFS certified company) who own 178,000 hectares of private land in Tasmania manage approximately 20% or 35,000 hectares for a variety of conservation values. This reservation is entered into voluntarily by Gunns Limited.

Following the Tasmanian Community Forest Agreement 1.45 million hectares (45%) of the 3.2 million hectares of forested land in Tasmania is now reserved for conservation reasons. The International Union for the Conservation of Nature (IUCN) recommend that 15% of forest area be reserved for conservation reasons therefore Tasmania's level is considerably above that recommended by the IUCN.

As part of this extensive reservation of Tasmanian land 97% of identified High Conservation Value Wilderness areas have been placed in formal reserves.

The Tasmanian RFA proceeds on the basis of the implementation of the Montreal Process Criteria and the JANIS Technical Working Group Report "Broad Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System in Australia". These processes are based on solid, well tested scientific criteria for the conservation of natural values.

### **Old Growth Forests**

Detractors of Tasmania's forest industry constantly raise public objection to the harvesting of old growth forests. Tasmania's forest area includes 1.25 million hectares of old growth forest, of which 1.007 million hectares (Approx. 80%) is reserved following the Tasmanian Community Forest Agreement.

The old growth reported as reserved only includes areas in formal reservation zones on both public and private land and does not include the extensive informal (and largely unreported) protection of old growth forest on private land.

The unreserved area of old growth forest is used to supply the Tasmanian saw milling and veneer industries with native forest timbers for the production of high quality furniture, veneers, timber flooring, mouldings etc for sale in the local and international markets. Any pulp wood that is generated from old growth forests is purely as an arising from the harvesting of those forests for sawlogs and veneer logs. The criticism of these harvesting practices by a small number of extreme environmental groups is about political positioning and not about the proper and responsible management of Tasmania's old growth forests for biodiversity and other conservation values.

### **Permanent Forest Estate Policy**

An integral component of the Tasmanian Community Forest Agreement reached between the Commonwealth and Tasmanian State Government was the retention of a Permanent Native Forest Estate equal to 95% of the 1996 forest estate as measured in the Comprehensive Regional Assessment processes in the promulgation of the Tasmanian Regional Forest Agreement.

Until this agreement Tasmania had operated under an interim Tasmanian Government policy that it was required to formulate and implement as a specific requirement of the RFA and that required retention of 80% of the 1996 forest estate.

In addition to this Statewide retention threshold additional criteria have been established to protect the viability of individual forest communities in the 8 bioregions within Tasmania.

This policy is designed to ensure the long term protection of Tasmanian native forest communities and the biodiversity that is represented by the complex nature of our forest ecosystems. A detailed reporting mechanism has been incorporated into the revised policy which will require both annual reporting against the Statewide retention threshold as well as providing for assessment and precautionary approaches in the event any bioregion observes a reduction in any forest community approaching 75% of its 1996 extent.

### **Social Contribution/Corporate Citizenship**

The forest industry in Tasmania applies Corporate Citizenship principles in respect to its approach to forest management and harvesting activities.

All cultural and heritage values are carefully assessed and protected from any harm from forestry activities through the application of the Forest Practices Code.

The level of conservation of Tasmania's forests is one of the highest in the world and this protection is enhanced by the application of the AFS and its PEFC certification achieved by our two largest land managers. In addition to the formal reservation achieved through the Federal and State governments the industry imposes its own conservation on its privately owned land.

We also take our responsibility to communities very seriously and engage in a wide range of voluntary initiatives to actively support the development of communities and ensure compatibility of forestry activities with the aspirations of the community. In particular we have actively participated in the creation and implementation of the following community support initiatives: -

Good Neighbour Charter – this charter ensures close cooperation and consultation with affected communities in areas where plantation forestry is carried out.

Tourism and Forestry Protocol Agreement – this agreement provides an important interface between the forestry and tourism industries and allows for the non-confrontational resolution of disputes between the two industries in the event of conflicting priorities or land use wishes.

The forest industry in Tasmania also engages closely with a number of community groups to ensure we operate compatibly with the views and aspirations of society. In particular we have a close working relationship with Timber Communities Australia, Aboriginal and Torres Strait Islander Commission, Tourism Council of Tasmania, Local Government Association of Tasmania, Tasmanian Farmers and Graziers Association, Tasmanian Aboriginal Land Council, Tasmanian Chamber of Commerce and Industry, Greening Australia and many others.