



Forest Industries Association
of Tasmania

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11th August, 2006

Dear Christina,

Re: Tasmania's Draft NWI Implementation Plan.

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, sawn 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 plantation estate totaling over 160,000 hectares.

FIAT welcome the opportunity to provide comment on the Implementation Plan for the National Water Initiative – Tasmania (Draft June 2006)(NWIT). FIAT are very aware of the development of the National Water Initiative at a national level and the focus that has been placed on the plantation sector at a national level through this process. Through our affiliated national body, the National Association of Forest Industries, FIAT have raised significant concerns over this

focus. Plantations have been singled out as the only major land use change, as well as the only land-use that takes advantage of rainwater, to be labeled as a significant interceptor of water. We object strongly to this discrimination which is based more on emotion than science. FIAT and NAFI/TPA will continue to lobby at a Federal level with regard to these issues.

There is clearly a need for more research and equitable treatment of all dry land crops with respect to water use. Currently in Tasmania there are approximately 226,000 hectares of plantations, which account for approximately 3% of Tasmania's land area.

The implementation plan states that "In Tasmania, plantation forestry is **the** key large scale land use change activity". This statement should instead note that plantation forestry is **a** key large scale land use change activity.

In support of this contention we note that the DIER commissioned report "Rural Land Use Trends in Tasmania 2003", identifies that only 3% of the State is utilised by plantation forestry, whilst 24% is under various agricultural uses. It may be that on more recent trends a shift towards conversion to plantation forestry may be the largest change occurring. However, when viewed objectively over time, there can be no doubt that agricultural uses make up the vast bulk of conversion that has occurred. We believe this should be recognised in the implementation plan.

We believe that the environmental, social and economic impact of major land use change ought to be the focus of this segment of the implementation plan without any specific bias to examining change as a result of plantation forestry.

FIAT acknowledge that given the wording of the current NWI, the implementation plan for the NWIT must acknowledge plantations and their potential impact on water availability. It is only in this context that FIAT are generally supportive of the approach that has been taken by the Tasmanian Government in their implementation plan. We are supportive of a triple bottom line approach to considering plantations and water use. Through proper planning and management, plantation development contributes to more sustainable land use in rural areas by providing substantial environmental, social and economic benefits with little, if any, impact on water availability.

FIAT believe that it is important that the implementation plans for the National Water Initiative in the various Australian states and territories should be structured to ensure that local conditions are a primary determinant for the promulgation of activities to activate the central themes of the NWI. To adopt an approach which is too centralist an approach to issues associated with water reform, will potentially lead to outcomes in a country as diverse as Australia, let alone in a state as diverse as Tasmania and which are contradictory to the stated objectives.

As an example Tasmania has relatively plentiful water resources and relatively few detrimentally impacting activities when compared with most other areas of Australia. Tasmania also has a large number of small catchments when compared to other catchments throughout Australia. Compatibility of outcomes is an admirable goal but one that should be pursued with a cautious eye to local circumstance as pursuit of compatibility for the sake of compatibility alone would be foolhardy.

A useful starting point for a nationally focused program such as the National Water Initiative would be a critical examination of current water resources by State or region. This would ensure that a properly informed baseline exists to ascertain the extent to which various themes in the NWI are relevant within a State or region.

In respect to the development of a comprehensive catchment planning tool, FIAT are strongly supportive of this initiative which will provide essential information to monitor the true impact on the effects of plantation establishment and growth on hydrological flows and interception. We are concerned however that this project appears to be too narrow in its focus and ought to be looked at more broadly to enable modelling of the impacts of rural land use change applicable to all agricultural crops; they all take advantage of the rainwater that falls upon them.

FIAT are also concerned that the breadth of representation on the technical working group charged with developing an alternative to the CSIRO TasLucas model is far too narrow and should be broadened to incorporate public and private sector experts in the areas of forestry operations. We do not believe the existing panel of DPIW and the FPA will provide sufficient breadth of experience, knowledge and expertise nor will its work necessarily be accepted by industry without question. It is important that this task be undertaken correctly in the first instance and in a manner that will provide confidence to the industry in respect to the model itself and the inputs used to prove that modelling.

We are heartened in this respect by the overarching statement in the NWIT that “The Tasmanian Government recognises that the hydrological impact of large scale land use change, is an important issue for the State, and will ensure that any measures developed to meet the NWI commitments are based on the best available science and implemented following consultation with key stakeholders”, our views here should be interpreted as furthering that objective.

With respect to the establishment of an Expert Working Group on Interception, it is critical that there is industry representation on this group. We note from the implementation plan an intention to establish such a group and FIAT believe that it is vital that this group include representation from the forest industry especially given that its role will be to adopt a triple bottom line assessment of water interception by forestry plantations. However, as stated earlier, through our

national body, the National Association of Forest Industries, FIAT have raised significant concerns over the singling out of plantations as the only major land use change, as well as the only land-use that takes advantage of rainwater, to be labeled as a significant interceptor of water. We object strongly to this discrimination which is based more on emotion than science. Again our views are consistent with the overarching statement referred to earlier.

FIAT contend that water managers must establish a baseline for environmental water allocations and provide some recognition of the positive, as well as negative, externalities that may arise from various water uses. This assessment is essential for underpinning environmental flows and for identifying the environmental impacts of each water use.

When estimating the 'environmental flows', strong consideration should be given to the volume and timing of historical flows. The historical water flows are essential for maintaining biodiversity and regaining the natural mix of species that would have most likely existed in the farming catchments prior to the clearing of forests and woodlands for agriculture.

We further believe that the positive effects of forestry activities should be more actively recognized within the implementation plan. For example reforestation with plantations provides substantial environmental, social and economic benefits. Targeted plantations can help control erosion, reduce salinity and improve water quality. Plantations can be located to reduce the movement of water through salt stores. For example, reforestation with blue gums is reducing salinity in the Collie and Denmark Rivers, Western Australia and could have similar effects for salt affected areas in Tasmania. Afforestation of land that was previously used for other agricultural pursuits has also resulted in significant improvements to water quality (reduced sedimentation and E.coli loads) whilst at the same time delivered social benefits to rural communities.

In broad terms FIAT are supportive of the approach detailed in the NWIT subject to the above comments.

We sincerely appreciate the opportunity to provide comments on the Draft NWIT and indicate our willingness to continue to work closely with Government on this important issue.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Terry Edwards', written in a cursive style.

Terry Edwards
Chief Executive