

FOREST INDUSTRIES ASSOCIATION OF TASMANIA

COMMENT

TO

**RESOURCE PLANNING AND
DEVELOPMENT COMMISSION**

ON

**DRAFT RECOMMENDATIONS REPORT
ON PROGRESS WITH THE
IMPLEMENTATION OF THE REGIONAL
FOREST AGREEMENT (1997)**

31 OCTOBER 2002

Executive Summary

The Forest Industries Association of Tasmania (FIAT) welcomes the invitation of the Resource Planning and Development Commission (RPDC) to provide commentary on the "Draft Recommendations Report" (The Report).

It is our intention to make comment on each of the 26 recommendations so as to ensure the views of members of FIAT are known when the RPDC move to finalise the report to be provided to the Ministers by way of a Final Recommendations Report.

FIAT is strengthened in its unwavering support for the RFA processes and the RFA itself by the overall positive tenor of the RPDC's Draft Recommendations Report and the majority of the findings within it.

In particular we are pleased to observe the following passage from the Executive Summary of the Draft Recommendations Report: -

"The Commission considers that the Tasmanian and Commonwealth Governments (the parties) have made substantial progress in implementing the RFA. Where specific performance benchmarks were identified in the RFA these have been met on nearly all occasions and, if not met, substantial progress has been made. Clearly the parties have devoted substantial resources towards making the RFA a success. The Commission has made some specific recommendations to cover issues where further progress needs to be made in a timely manner." (Page 1)

In our view this passage is an accurate and astute assessment of the RFA and its relative success. There has been a substantial commitment by the parties to make the RFA a success in the face of a considerable and concerted campaign by environmental groups to both discredit and derail it.

The Commission makes comment that the bulk of criticism of the progress of the implementation constituted criticism of the RFA itself, which is clearly outside the terms of reference of the enquiry. This approach has been a consistent tactic by the opponents of the RFA and the forest industry and has been damaging to the credibility of the RFA and has contributed significantly to the lack of public understanding and acceptance of the RFA.

This is an issue that will require consideration in the context of some of the recommended strategies suggested by the RPDC.

Equally pleasing has been the finding by the Commission that the commitment of the parties to ecologically sustainable forest management "is clear and unequivocal and has met the terms of the RFA."

The report card on the RFA constituted by the draft recommendation report has unequivocally demonstrated the success of the agreement. That said it is equally true that there are issues where greater focus and commitment of resources are required. We will endeavor to highlight those areas within this submission and additionally will provide comment on those recommendations where we are not totally consonant with the approach of the RPDC.

It is imperative that the endeavours of the parties seeking to achieve fundamental change to the RFA are met with a flat and unequivocal rejection. There have already been a number of issues that have impacted on the confidence of the industry that the resource identified through the RFA is indeed secure. Continued entertainment of submissions contrary to the terms of reference of the 5 year review an only serve to further undermine that confidence to the detriment of the RFA itself.

In the same category is the Tasmania Together benchmark that seeks to interfere with the RFA designation of multiple use forests that might be available to the forest industry for production forestry. This action undermines the confidence of the industry to invest and will therefore militate against the maximization of the value of the RFA to the State. We urge the RPDC to recommend to the Government of Tasmania that such inconsistent pressures are contrary to the RFA and act to undermine it.

We will turn now to consider the recommendations made by the RPDC within the Draft Recommendations Report.

Proposed Recommendation 3.1

“That the State continues to improve forest community mapping. Particular attention needs to be given to improving the mapping of forest communities in reserves through additional field survey.”

The Commission has correctly identified that the RFA commitment to add an additional 473,474 hectares of formal reserves has been exceeded by approximately 39,000 hectares through the inclusion of target vegetation within the reserves.

The Commission additionally identifies that the agreed levels of reservation for most forest communities and old growth communities have been met (or exceeded) or an adequate explanation provided.

We fully support the observation by the RPDC that greater communication on changes to boundaries and the reasons for those changes would be advisable. That said the nature of the submissions made does not lead to any view that criticisms of this nature would be vitiated by any such improved communication.

We note again as has the Commission that reservation of some forest communities in excess of the Janis criteria has had and may continue to have an adverse impact on high quality wood resource to industry. We note the Commissions view that this is an inevitable outcome of the establishment of the CAR reserves however the issue of industry sustainability must rank equally with that outcome.

We therefore propose that Draft recommendation 3.1 be amended by the addition of the following words after the word “survey”:-

“... and to ensure no further diminution of wood supply to the industry.”

Proposed Recommendation 3.2

“That the State ensures the reservation of reserve areas vested in the Hydro-Electric Corporation with these to be reviewed at the 2007 five year review.”

FIAT supports this recommendation provided the review of the HEC vested land requirements is completed prior to formal reservation.

Proposed Recommendation 3.3

“That the parties commit to designing a program that provides for the long term future of the Private Forest Reserve Program and in particular provides for the future financial resources for management, mentoring and reporting of properties conserved under the RFA Private Forests reserve program.”

It is apparent that there have been considerable delays in the implementation of the Private Land Reserve system and that it is unlikely that the programs protection targets will not be met by the time funds are expended.

Correction advised to RPDC 1/11/02 – changed unlikely to likely

It is appropriate for a recommendation similar to recommendation 3.3 to be made in these circumstances and it is apparent a further funding allocation is likely to be required if this program is to achieve its targets.

We therefore support recommendation 3.3.

Proposed Recommendation 3.4

“That the State reinforces and makes more effective the mechanism for providing the RFA Private Forests Reserve Program with basic forest type and coverage information for areas being assessed under the Private Timber Reserve approval process.”

Whilst we do not oppose this recommendation we do wish to express the concern that the general tenor of the discussion that leads to this recommendation presupposes that the inclusion of land in the Private Forest Reserve Program should receive some degree of priority over other uses including wood production.

This presupposition is inappropriate, as wood production should be given equal priority ranking with other potential multiple uses of a forest including reservation within the Private Forest Reserve Program.

The continued push to remove especially high quality forest communities from sustainable harvesting regimes can only, lead to further restriction on the supply of high quality resource to the States timber industry.

We believe notification to the Private Forestry Reserve Program by Private Forests Tasmania at the time of an application for a Private Timber Reserve is an adequate manner of progressing this issue.

A more aggressive system should revolve around Private Forests Tasmania actively identifying potential land/forests and not waiting until a landowner

makes an application for a Private Timber Reserve to trigger an assessment and negotiation. The improved reporting requirements inherent in this recommendation are also supported.

Proposed Recommendation 3.5

“That the parties clarify the commitment in Clause 39 of the RFA and make publicly available information on progress to date and how they intend to pursue the implementation of this commitment including the timelines.”

We consider this recommendation to be appropriate

It is important to stress that the requirements of Clauses 40, 41 and 42 are relevant in the context of any consideration of Clause 39.

We note reference to the Savage River Pipeline Corridor and an attempt to make any World Heritage value assessments inform any decision on access to this area. We strongly agree with the Commissions view that such an outcome is not required by the RFA and is therefore beyond the scope of this review. We also say that such an outcome would be totally incorrect as it would again lead to a situation where decisions are made predominantly on the basis of conservation ideals without proper consideration of the other two legs of the triple bottom line being economic and social issues.

Proposed Recommendation 3.6

“That the State makes known its decision on future access to the deep red myrtle resource in the Savage River Pipeline corridor by December 2002

We agree that the decision on future access to the deep red myrtle resource in the Savage River Pipeline Corridor is one that needs to be made sooner rather than later.

We further agree with the Commissions observation that this is an issue of interest to many stakeholders and this includes members of FIAT who require secure access to this resource in order to properly manage their businesses into the future.

We note as do the Commission the report of the Deep Red Myrtle Review team along with the independent audit of the processes followed by that Review.

We note the comments of the Commission that at the rates provided within the RFA and given the finding of the review that the RFA rate of harvest does not constitute a sustainable level of harvest. FIAT made the submission as

part of its presentation to the Commission that this is a technical issue that requires resolution between expert forest managers and the industry. What is required as the first part of that process is a decision by the Minister that access to the resource is permitted and that the actual sustainable level of harvest should be referred to Forestry Tasmania and the industry for further discussion and clarification.

Proposed Recommendation 4.1

“That the State improves the accountability of the Forest Practices System. Issues to consider include:

- Improving transparency and communications, in particular, public access to information on Forest Practices Plans, through a central access point designed to improve industry consultation with neighbors and local communities;
- Improving on ground implementation of Forest Practices Plans by introducing minimum standards of training, education and accreditation of forest operatives, and introducing systems to convey the detail of the Forest Practices Code and Forest Practices Plans in a form readily available and understandable to forest operatives;
- Improving public understanding of the Forest Practices System including the Forest Practices Code, the role of the Forest Practices Board and, in particular, the public and legal policy framework in which the Forest Practices Board operates;
- Reviewing the efficacy of the self regulatory aspects of the Forest Practices System in the next 5 year review of the Forest Practices System; and
- Ensuring provision of additional funding, including from industry, to support the communication and research functions of the Forest Practices System.

The Forest Practices Act and Code provides Tasmanians with a world-class system that provides effective control of the planning and conduct of timber harvesting on both private and public land.

The fact that the Forest Practices System applies equally to private land adds greatly to its overall effectiveness but it requires consideration of individual landowners rights in developing the process of plan development and implementation and associated communication. Landowners have accepted that operations on their land must consider the broader community values identified within the Forest Practices System (social, economic and environmental) but they would be unlikely to agree that the details of a Forest Practices Plan should be released to the public at large or that the public should have an opportunity for input into the development of the plan. It is more appropriate that community values are taken into account by the experts (Forest Practices Officers) and that the Forest Practices Unit in turn monitors the experts' performance.

Forest Practices Plans (FPP) are very technical and complex in content, usually resulting in a document of 30 pages or more. The Forest Practices Plan formally documents expert consideration of special values within the coupe and vicinity as well as operational aspects of timber harvesting. Under the existing procedures, neighbours and local government are notified of impending operations and provide a point of contact should they require more information.

Forest Practices Officers (FPO) in executing their duties are personally accountable to the Forest Practices Board regardless of who their employer is. They undergo intensive training and must pass a competency test to become accredited and must attend refresher courses to keep up with changes. It is pleasing to note that the RPDC found no evidence of corruption in how Forest Practices Officers execute their duties.

We are not surprised the Commission has received information giving rise to the perception that the Forest Practices System has a number shortcomings. We know there are many individuals seeking to frustrate or stop timber harvesting entirely.

We particularly note in this context the views of the Commission expressed in the final paragraph of page 2 of the Draft Recommendations Report and simply observe that there are some complaints that are difficult to resolve as the complainant for whatever reason is unwilling to resolve the matter.

We also observe in the context of the self-regulatory aspects of the Forest Practices System that the industry already contributes substantially to the cost of operations and research functions carried out by the Forest Practices Board and additional costs on industry are not warranted. If the system is to provide for any element of external scrutiny above that already permitted it should be provided strictly on a user pays basis.

In respect to research functions of the Forest Practices Board the industry already contributes significant sums of money to this function and it may be more appropriate for the Forest Practices Board to investigate the prospect of external funding sources from, for example, the Forest and Wood Products Research and Development Corporation which receives considerable funding from industry levy along with Commonwealth contributions.

Given the need to protect landowners rights and the unsubstantiated nature of the bulk of the perceived concerns we believe the recommendations are too specific and suggest the following alternate recommendations:

Proposed Revised Recommendation 4.1-

“That the State as part of the five yearly review of the Forest Practices System consider amongst other issues the means to:

- Improve public understanding of the Forest Practices System, including the Forest Practices Code, the role of the Forest Practices

Board and in particular the public and legal framework in which the Forest Practices Board operates;

- Formal accreditation of forest operatives regarding Forest Practices Code competencies be established;
- Reviewing transparency and communications regarding FPP's taking due regard of individual landowners rights, privacy and commercial sensitivities and appropriate protection against frivolous demands that do no more than delay and frustrate the orderly processes of the industry.
- Reviewing the efficacy of the self regulatory aspects of the Forest Practices System in the next five year review of the forest practices system; and
- Ensuring the provision of additional funding to support the communication and research functions of the Forest Practices System."

Proposed Recommendation 4.2

"That the parties complete the preparation of Recovery Plans for all endangered forest-related threatened species within the next 5 years. Where species listed under the Tasmanian Act meet the criteria for listing under the Commonwealth Act, both parties should contribute funding."

We understand the issues that give rise to this recommendation but express concern that the time frame provided may be too constrained and urge a more relaxed approach.

In the 5 years of the RFA 13 Recovery Plans and 8 multiple species Recovery Plans have been prepared. No indication has been provided of how many of the remaining 560 threatened species are "forest-related" and therefore caught by this recommendation, given the urgency with which the Commission have approached this issue, we can only assume it is a reasonable proportion.

If our assumption is correct it may be unrealistic to recommend all remaining forest-related Recovery Plans be completed within 5 years.

We note the content of Draft Recommendation 4.3 in respect to accrediting Threatened Species Listing Statements as an alternative to Recovery Plans and believe that approach may assist the process.

We simply urge a caution in approaching and finalising this Draft Recommendation.

Proposed Recommendation 4.3

“That the parties accredit Threatened Species Listing Statements as an alternative to Recovery Plans for listed threatened species and as providing for adequate management of listed threatened species under the RFA.”

The comments we made in respect to Draft Recommendation 4.2 in part are applicable to this recommendation.

We support the recommendation as being an appropriate and prudent response to the listing of threatened species.

Proposed Recommendation 4.4

“That the State provide for the protection of threatened Forest Communities through an appropriate statutory frame work.”

It seems that this recommendation is largely in support of an existing State Government intention to amend existing legislation to permit the listing of threatened vegetation communities. To the extent that this recommendation is in accordance with the Threatened Species Strategy 2000 we support it.

Proposed Recommendation 4.5

“That the parties deliver on the outstanding National Estate commitments contained in Clause 6 and Table 1, Category 3 of Attachment 1 to the RFA, prior to commencement of the next five year review.”

It is appropriate that outstanding commitments are concluded. We note that the Commission found that the parties have delivered on the bulk of commitments relative to their recommendations “with only a few commitments outstanding”. We also note that the Commission believes that the outstanding commitments are “not critical in the context of achieving the overall objective.”

Proposed Recommendation 4.6

“That the parties prepare a list of relevant research reports at future five yearly reviews.”

This is a sensible and welcome addition to the 5 year review process that will enhance the already comprehensive nature of the process. We support this recommendation.

Proposed Recommendation 4.7

“That the list of priority research areas in Attachment 13 should be reviewed by the parties at future five yearly reviews to determine if priorities have changed.”

This proposed recommendation is strongly supported however the review encapsulated by the recommendation must incorporate industry representations and not simply the parties to the RFA. It is imperative that industry provides a direct input to this process to ensure industry trends and needs are properly taken into consideration in any such review.

The view that the recommendation contemplates will be a welcome addition to future 5 yearly reviews.

Proposed Recommendation 4.8

“That the State develops an environmental management system for reserves and other public lands consistent with Attachment 5 of the RFA prior to the next five yearly review.”

It would be consistent with the accreditations of State forest management to ISO 14001 standard that reserves managed by the State outside State forests also pursue accreditation to that standard.

Proposed Recommendation 4.9

“That the parties encourage the development of environmental management systems in the private forest sector.”

The recommendation that there be an encouragement of the private forests sector to adopt environmental management systems is welcomed, however in the absence of funding assistance the recommendation is likely to only achieve limited success.

The pursuit of appropriate EMS (eg ISO 14001) is an expensive and highly time consuming process and beyond many of the smaller private forest managers. This process may, in part, be achieved through the pursuit of environmental accreditation through the Australian Forestry Standard, which might be a preferable mechanism for pursuit.

Proposed Recommendation 4.10

“That the State completes the review of the policy on maintaining a Permanent Forest Estate taking into account more recent information on forest community conservation. That, subsequent to the review and before the end of 2002, the State amends the policy to increase the levels of retention of native forest, and specifically to ensure that no further forest communities become threatened and that there is no deterioration in the status of any existing threatened forest community.”

It is clear from the Background Reports and the Commission’s analysis that the existing policy on Permanent Forest Estate is achieving all of the objectives of the RFA. Page 88 “Maintaining a Permanent Forest Estate” of the Background Report states that the native forest estate has been maintained at least at a level of 98% of the native forest that existed in 1996. It goes on to say “The Current native forest is well in excess of the Permanent Forest Estate policy threshold within all bioregions.” The recommendation of a more fundamental review and the presupposition that it will lead to “increase the levels of retention of native forest”, is not accepted.

The evidence in the Background Report is that the native forest reduction during the term of the RFA has been between 1.2% and 2% with the actual level being somewhere between those parameters. Given that this level has been achieved during a period where the IFM process has permitted greater levels of native forest harvesting for plantation establishment, we say no review of existing policy is warranted.

In the event that any review proceeds it must be with the full participation in the process of all relevant private sector stakeholders. Any such review must consider the prospect of differential levels of retention as between reserves, public land and private land.

It must also be a feature of any amendment to the Permanent Forest Estate policy that compensation is payable in the event any private land owner is prevented through the application of the policy from harvesting forested areas for any reason.

The review process must be fully transparent, involve all relevant stakeholders and must take account of all relevant factors including differential land tenure.

The review must also focus its attention primarily on the entire Forest Estate and not unnecessarily focus on the native forest estate. In this context we note that the Forest Estate actually increased during the life of the RFA by 10,700 hectares or 0.3%. In these circumstances it is difficult to comprehend the direction of this proposed recommendation nor indeed the urgency with which it is to be achieved.

We put to the Commission that this fundamentally important question needs and deserves a more appropriate timeframe if a review is to proceed. A more realistic timeframe will permit an opportunity for meaningful consultation with private sector stakeholders.

We are of the strong view that the current Permanent Forest Estate policy is adequate to meet its purpose and further review and increased levels of retention of native forest estate is not warranted.

Proposed Recommendation 4.11

“That, subsequent to the review of the policy on maintaining a Permanent Forest Estate, the State implements the policy through a legislative framework.”

We support legislation to properly enshrine a Permanent Forest Estate but stress the comments made in respect to Proposed Recommendation 4.10.

Proposed Recommendation 4.12

“That the Forest Practices Board considers during the next review of the Forest Practices Code the issue of smoke management from forestry operations, including giving effect to the smoke management guidelines.”

We note that this recommendation endeavours to bring the whole question of the management of smoke from forestry operations into the review of the Forest Practices Code.

We believe that this recommendation is appropriate in its targeting of smoke generated by forestry activities in that it appears to permit the examination of the problem from a broader perspective through the State Fire Management Council guidelines for smoke management.

The Commissions background and analysis leading to this recommendation identifies that there are many sources of smoke including a number that result from planned burning activities such as regeneration burns for forestry, plantation establishment, land and crop management in the rural community and for land management within reserves and council controlled areas.

It appears that this issue is broader than the role of the Forest Practices Board and we therefore believe the State Fire Management Council is the appropriate body to provide guidelines to administer smoke management.

It should however, be open to the Forest Practices Board to tailor any such guidelines to suit the needs of forestry operations and to seek compliance with the Council guidelines.

We therefore suggest the recommendation be amended to read as follows:

“That the Forest Practices Board considers during the next review of the Forest Practices Code the issue of smoke management from forestry operations including assessing the smoke management guidelines issued by the State Fire Management Council for their applicability and suitability for adoption into the code.”

Proposed Recommendation 4.13

“That the State moves quickly to implement the proposed Natural Resource management legislation and to facilitate regional natural resource management strategies.”

We note and approve of the Commissions assessment of issues relating to integrated catchment management and the advent of the Natural Resource Management Bill (2002).

In our view, the draft recommendation is appropriate and we support it. The Natural Resource Management Bill 2002 will provide an appropriate vehicle to deal with integrated catchment management issues in a manner that complies with the provisions appearing in Attachment 10.2 of the RFA.

Proposed Recommendation 5.1

“That the parties develop a process, as a priority, to obtain reliable data to inform social and economic indicators for the community, and the performance of the forest based industries relevant to Attachment 12 of the RFA. The sustainability indicators relevant to the social and economic aspects of the industry need to be reviewed when such reliable data becomes available.”

FIAT unconditionally welcomes this proposed recommendation. We believe that the data collected should include the same level of comprehensiveness as the data that is compiled to measure the conservation benchmarks contained in the RFA.

The recommendation may go a little further and suggest that the collection of the reliable data be undertaken in consultation with the Forest and Forest Industries Council.

We therefore propose that Recommendation 5.1 be amended to read as follows:-

“That the parties develop a process and commit the required resources, as a priority, to obtain reliable data to inform social and economic indicators for the community, and the performance of the forest based industries relevant to

Attachment 12 of the RFA. This process should be undertaken in consultation with the Forest and Forest Industries Council. The sustainability indicators relevant to the social and economic aspects of the industry need to be reviewed when such reliable data becomes available.”

Proposed Recommendation 5.2

“That the parties clarify the intent of Attachment 12 by 30 June 2003 and that the State prepares an industry development strategy, in consultation with the Commonwealth, by 30 June 2004, based on that intent and providing an industry vision and an action plan to achieve it. Table 5.1 provides an incomplete list of issues that should be covered by the industry development plan.”

FIAT enthusiastically welcomes this draft recommendation and in particular the proactive approach embodied within it to pursue industry development and a public education regime.

In concert with our comments on Draft Recommendation 5.1 we offer the opinion that the creation of an industry vision and an action plan to achieve it, would best be progressed by the Forest and Forest Industries Council.

In our view, this recommendation could properly require the parties to clarify the intent of Attachment 12 and the State to devise an overarching industry development strategy. The creation of an industry vision and action plans however may best be facilitated by the parties funding the Forest and Forest Industries Council to embark on this process. The FFIC is ideally situated to undertake this role given its broad representational constitution.

The FFIC could be required to deliver the vision and action plans to the parties for formal adoption in a manner similar to the Tasmanian Forest and Forest Industries Strategy developed in 1990.

The issues embraced by Table 5.1 are generally broad enough to encompass the bulk of issues that might be embraced within this Recommendation however we believe the public education program should be broader than envisaged within the Table.

There is a fundamental imperative for a properly resourced education campaign to raise public awareness about the RFA, its objectives, successes, the CAR reserve programme and the broad range of other issues that are not currently well understood in the community.

The single biggest failing to date of the RFA has been its inability to deliver to the forest industry the promised resource security. There are many reasons that underpin that failure but the primary one is the continued lack of public understanding and therefore acceptance of the RFA.

We believe the parties should ensure the resources required to properly educate the public and remove the considerable misinformation and ignorance that pervades the community.

The resourcing of this communication/education component of the review should contemplate specific and on-going funding of the Forest Education Foundation. We note in this regard the specific mention of the “excellent work done by the Tasmanian Forest Education Foundation....” (5.5.2)

The resources available for FEF are limited and currently stretched beyond reasonable limits. This body would therefore benefit enormously by an injection of seed funding that will permit the true forestry story including the benefits of the RFA to be taken into Tasmanian schools on a much broader scale than is currently possible.

It is also important that the list of issues contained within Table 5.1 not be considered to be comprehensive. Rather this list should seem to be indicative of the issues that should be considered rather than being exhaustive.

In light of the above comments, we propose that Draft Recommendation 5.2 be amended to read as follows:-

“That the parties clarify the intent of Attachment 12 by 30 June 2003 and that the State prepares an industry development strategy in consultation with the Commonwealth by 30 June 2004 based on that intent. That the parties appropriately resource and task the FFIC to develop an industry vision and an action plan to achieve it. Table 5.1 provides an incomplete list of issues that may be covered by the industry development plan. The parties should consider the provision of appropriate resources to the Forest Education Foundation to enhance the effectiveness of their current role.”

Proposed Recommendation 6.1

“That the State continues to improve transparency in reporting, and continuously improving the methodology as identified in previous sustainable yield reviews, with the aim of increasing public understanding of, and confidence in, the Sustainable yield reviews of high quality sawlogs from public lands.”

FIAT supports the broad thrust of this draft recommendation.

It is also important in our view that the sustainable yield reviews provide practical data on the quality of the resource being provided to the industry. Criticism continues to be made that there has been a significant reduction in the sawlog quality as a result of the increased focus on regrowth timbers.

This issue requires ongoing measurement to ensure that the commercial transition to regrowth and plantation feedstocks does not progress at the expense of quality.

Proposed Recommendation 6.2

“That the State develops a strategy for ongoing supply of special species timbers from public lands. The State needs to provide information to the market to clarify future resources.”

This recommendation is supported by the industry as it is imperative that up-to-date and comprehensive data on the on-going supply of special species timbers is readily available to ensure confidence and resource security.

Proposed Recommendation 7.1

“That the State finalises by 30 December 2002, it's nature-based tourism and recreational management policy approach required by Attachment 10.7 of the RFA.”

FIAT does not accept that there is any specific conflict between tourism and forestry but we do concede that from time to time specific actions or events can act to provide short term conflicts between the two industries. There is no conflict per se between these two uses of multiple use forests and indeed in many respects the two are inter related and interdependent eg roading.

We agree that a definite strategy to promote the development of forest based tourism is required and would progress this issue.

We also perceive the need for an increased co-operation between the forest and tourism industries to ensure better and more sympathetic planning of activities reduces the prospect of periodic conflict. This co-operation could occur at the peak body to level.

Proposed Recommendation 7.2

“That the parties continue to work with the apiary industry to resolve the issues on public land for beekeeping and the leatherwood resources.”

We believe this draft recommendation is appropriate however we believe it is important to note the limited nature of the submission referred to and that

there is at least anecdotal information that the views presented may not accord with those of the industry as a whole.

We fully endorse the right of the apiary industry to secure access to a leatherwood resource but this should not be to the exclusion of the wood production industry.

Unlike production forestry, the apiary industry could access leatherwood resource within the CAR reserves without damaging the biodiversity or integrity of the reserve.

This possible solution should be considered in any assessment of strategies to address the security of access to a leatherwood resource.

The additional research discussed in the report will provide a more fundamental understanding of a range of factors that impact on the apiary and associated industries including the economics and profitability of the industry.

Proposed Recommendation 9.1

“That the parties support ongoing research and development for sustainability indicators including, where appropriate, considerations of benchmarks and interpretation to guide performance outcomes.”

We believe this recommendation is entirely appropriate.

It is important that the range of sustainability indicators is as broad as possible and that economic and social indicators are enhanced in the manner described in other recommendations.

It is appropriate to ensure that the pursuit and reporting of indicators does not become an end of itself to the detriment of the pursuit of appropriate outcomes. Indicators should be a naturally occurring means of measuring actual results achieved.

We repeat our previously made view that social and economic indicators must be elevated in stature and importance to those used to measure environmental issues.