

The Institute of Foresters of Australia

ABN 48 083 197 586



29 May 2009

National Biodiversity Response
PO Box 1715
Tamworth NSW 2340

Dear Sir/Madam

Australia's Biodiversity Conservation Strategy 2010-2020

The Institute of Foresters of Australia (IFA) welcomes the opportunity to provide a submission on *Australia's Biodiversity Conservation Strategy 2010-2020*. Our submission is attached and our response in the attachment. I have also included responses to specific questions.

The IFA has developed a host of Policies relating to the management of forests, a number of which deal with that the management of biodiversity conservation in our forests. These are available at <http://www.forestry.org.au/ifa/g/g0-ifa.asp> and examples are provided in the Attachment.

The Institute would be pleased to make a member available to discuss the submission and any other issues of interest to the biodiversity response team.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Peter Volker', is written over a light blue horizontal line.

Dr Peter Volker FIF A RPF
President
Institute of Foresters of Australia

**Australia's Biodiversity Conservation Strategy 2010-2020
Submission by the Institute of Foresters of Australia**

The Institute of Foresters of Australia supports biodiversity conservation and sustainable use as part of a broad based approach to sustainable forest management. Unfortunately the strategy falls short of a substantive and strategic response to the biodiversity conservation and sustainable use issues in Australia's forests as:

- it relies on relatively limited analysis of the forest sector
- it misses opportunities to build on the existing national forest development policies and initiatives that embrace biodiversity conservation and sustainable development
- it reflect the opportunities to better integrate forest conservation and sustainable development in national forest policy
- proposed actions are limited, relying on generally ill defined plans, education and limited incentives
- it is not apparent that the outcomes sought will be achieved through the proposed actions
- there are no clear targets and specific strategies that would support that would support rational decision-making and priority setting.

The strategy does not therefore provide an advance beyond existing policy responses and adds little to the National Forest Policy Statement and related land and forest management policies and regulations already implemented.

The biodiversity strategy is not integrated with existing policies and programs. Both domestic and international policy commitments suggest the need for integration of forest policies to achieve forest biodiversity outcomes. This is reflected in the decisions adopted by the Conference of the Parties (COP) to the Convention on Biological Diversity in May 09 (COP 9). For example the draft strategy for 2010-2020 is inadequate in meeting obligations outlined in COP9 Decision 8 paragraph 8 where it is a requirement to incorporate explicitly the three objectives of the Convention into revised national biodiversity strategies and action plans. As a result there is not a clear alignment of the revised Strategy with international treaties and the National Forest Policy Statement.

The Convention on Biological Diversity highlights the need for integration with existing policies and programs, stating that parties will:

- develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity or adapt for this purpose existing strategies, plans or programmes which shall reflect, inter alia, the measures set out in this Convention relevant to the Contracting Party concerned
- integrate, as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans, programmes and policies.

Further the Institute brings to the attention of the authors of Australia's revised national biodiversity strategy important COP decisions to be considered in drafting the National Biodiversity Strategy. COP Decisions VII/30 and Decision VIII/8 provide clear guidance and obligations for National Biodiversity Strategy and Action Plans to contain Goals and Targets as set out in Annex II using the framework specified in paragraph 1 to Decision VII/30. Decision IX/8 (paragraphs 6-8) articulates what needs to be incorporated National Biodiversity Strategy and Action Plans. The Institute believes that the strategy should incorporate the COP framework into Australia's revised NBSAP. That is:

- (a) Reducing the rate of loss of the components of biodiversity, including: (i) biomes, habitats and ecosystems; (ii) species and populations; and (iii) genetic diversity;
- (b) Promoting sustainable use of biodiversity;
- (c) Addressing the major threats to biodiversity, including those arising from invasive alien species, climate change, pollution, and habitat change;
- (d) Maintaining ecosystem integrity, and the provision of goods and services provided by biodiversity in ecosystems, in support of human well-being;
- (e) Protecting traditional knowledge, innovations and practices;
- (f) Ensuring the fair and equitable sharing of benefits arising out of the use of genetic resources; and
- (g) Mobilizing financial and technical resources, especially for developing countries, in particular least developed countries and small island developing States among them, and countries with economies in transition, for implementing the Convention and the Strategic Plan;

Given the relevance of these provisions to domestic strategy it is difficult to understand how the Strategy can meet international obligations. Importantly, there are real advantages to greater integration. The Ecologically Sustainable Development Working Group on Forest Use specified three requirements for sustainable forest use:

- maintaining the ecological processes within forests (the formation of soil, energy flows, and the carbon, nutrient and water cycles)
- maintaining the biological diversity of forests
- optimising the benefits to the community from all uses of forests within ecological constraints.

The National Forest Policy Statement adopts these principles as the basis for ecologically sustainable development. Critically it is framed around all as interlinked and essential components of forest policy. This has been the hall mark of its success. However, this is not reflected in the national biodiversity strategy.

Instead a literal reading of the strategy would suggest the initiatives proposed supplants existing forest policies in managing biodiversity as part of ecological sustainable development as it suggests that a series of new actions may be required. We would instead see the need for the strategy to explicitly address its relationship to existing policies and programs.

We would note the strategy suggests nothing that is new for the forest sector and the suggested. Importantly, there is scope to enhance biodiversity conservation and use outcomes by looking across the span of activities currently being implemented across the forest sector. This provides direct benefits to biodiversity conservation through instruments such as certification schemes, codes of practice that provide effective regulation of the much of Australia's forests. Equally, there are also other opportunities to promote market based approaches to biodiversity conservation and sustainable development of forests and better outcomes for indigenous communities in sustainable management of non-wood products.

At the forest level we see some opportunities to build upon existing policies and would see the major scope of the biodiversity strategy in relation to fire management, active management of all forests. IFA notes that the 1992 National Forest Policy Statement has provided a sound strategic basis for Australian forest policy for nearly two decades. But there is scope for improving the outcomes and specific biodiversity outcomes. These provide the basis for moving forward and supports the underlying objective of the National biodiversity strategy through (drawn from the IFA's upcoming policy on next steps in forest policy):

- Active management to sustain the values of all native forests - Management strategies for all forests, including those reserved for conservation, needs to recognise the importance of active management to sustain their values, at both stand and landscape scales. Inadequate resources and a focus on 'preservation' means that major threats to forest values - such as fire, disease, pest animals, weeds and forest age structure - and their impact on conservation values are not being adequately addressed. This will require an injection of funding into research and management capability to ensure fire management strategies sustain health and vitality protect ecological diversity; minimise damage to environmental values; and minimise the risk of fire damage to park facilities, neighbours and community assets and infrastructure. *This is only partially addressed in the national biodiversity strategy*
- Enhancing the role of forests in delivering ecosystem services –Forests of all tenures are, or could be, ecosystem services 'hot spots' delivering a range of essential services at little cost (biodiversity conservation, clean water and carbon storage). The policy framework necessary to enhance management of both native and planted forests on all tenures –public, private and indigenous - needs to be more fully developed to realise these benefits. Two specific components of this framework should be:
- Develop the role of forests as part of climate mitigation responses - Australia's Emission Trading System needs to include all forests, woodlands, plantations, farms trees and forest products, and separately account and report on the forest sector, rather than reporting forests as part of the land use change sector. As a net positive contributor to climate change mitigation, forests have a significant role to play in climate change response strategies. Whole-of-life-cycle analysis is necessary to ensure that the carbon footprint of forest products is assessed fairly

compared to alternative products. *This is not addressed in the national biodiversity strategy*

- Supporting the role of plantations in delivering multiple benefits – Policies for plantation expansion have emphasized the economic and social benefits of plantation investments, but not supported the potential of planted forests to deliver environmental services. A policy framework, which assessed and facilitated the delivery of environmental services from all rural land uses, would provide a better basis for managing planted forests to deliver these services. *This is not addressed in the national biodiversity strategy*
- Strengthen implementation of the National Indigenous Forestry Strategy – Aboriginal Australians now own and manage 13% of Australia’s forests, for a range of objectives – including cultural values, conservation, and income generation. Implementation of NIFS and related forest-based initiatives can support Aboriginal Australians’ interests, address indigenous disadvantage, and enhance the sustainable management of a substantial proportion of Australia’s forests. *This is not addressed in the national biodiversity strategy*
- Develop enhanced regulatory and reporting systems to support sustainable forest management – In many states, the regulatory framework for forest management is fragmented and applied inconsistently across tenures, resulting in high transaction costs and poor sustainable management outcomes. In contrast, some states have developed and implemented outcome-based codes of forest practice, which apply across all tenures. Both forest certification and consistent, triple bottom line reporting on forest management outcomes have important roles in such systems. Streamlined regulation and comprehensive outcome-based codes of practice applying across all land tenures should address all major forest disturbance activities, not just timber harvesting. *This is not addressed in the national biodiversity strategy*
- Foster innovation in forest management and the use of forest products - There is limited and declining investment in forest research and innovation. Greater priority must be given to improving Australia’s capacity to manage for production and sustainability of forest values through research, education and training that takes into account the major long-term challenges to forest management. This should include a focus on the issues identified above, and on the innovative use of forest products, to fully realize the value of their low carbon footprint. *This is only partially addressed in the national biodiversity strategy*

About the Institute

The Institute of Foresters of Australia is a professional organisation of 1300, the members of which are engaged in all branches of forest management and conservation in Australia. The IFA is strongly committed to the principles of sustainable forest management and the processes and practices which translate these principles into outcomes. Through this submission the IFA offers its professional expertise in land development and forest science.

The IFA has a comprehensive suite of forest policies, some of which are relevant to the development of the strategy. Key statements for IFA policies, which are relevant, are given below. The full policies may be accessed at <http://www.forestry.org.au/ifa/g/g0-ifa.asp>. A listing of relevant policies – key statements related to biodiversity protection in forests is attached for information

Attachments

- Responses to specific issues – as per response team questionnaire
- Extracts from IFA policies.

Extracts from IFA policies.**Policy 1.4 Timber Production & Biodiversity**

The IFA considers that the maintenance of biological diversity is an essential component of sustainable native forest management. Biodiversity can be maintained and enhanced in native forests and plantations managed for timber production through the application of science based Codes of Practice, forest management plans and forest certification standards.

Policy 2.2 Management of Private Native Forests

The potential environmental and economic contribution from private native forests is often under-valued by landholders and the community. As forest production from public forests is reduced there will be increasing demands and opportunities for private forests. In most Australian States and Territories there are inappropriate government policies and inadequate institutional and commercial support for the management of private native forests. The IFA considers that private native forests provide important multiple benefits to the community and that improved institutional support, appropriate incentives and payments for environmental services are opportunities to facilitate sustainable management of these forests.

Policy 2.3. Plantations in Rural Landscapes

The IFA recognises that well planned and managed plantations can generate substantial economic, environmental and social benefits but may also have negative impacts. The IFA advocates the continued development of plantations in rural landscapes providing that this development balances environmental, social and economic impacts. Native forests should not be cleared for plantation establishment where this would compromise regional conservation and catchment management objectives. Plantation development on private land should be assessed against criteria, which also apply to alternative land-uses.

Policy 2.4. Clearing of Native Forests for Plantations

The IFA supports and encourages:

- Protection of regionally significant areas of native vegetation;
- Scientifically based identification and assessment of the conservation value of remnant native vegetation;
- Conservation of appropriate areas of native vegetation within plantation developments, including riparian zones, steep slopes and conservation corridors;
- Adherence to appropriate legislative processes governing the clearance of native vegetation.

Policy 2.6. Forest Management Planning

Forests have multiple and diverse values that need to be integrated into plans incorporating the principles of ecologically sustainable forest management (expressed in the Montreal criteria). Strategic forest management plans guide forest management activities and takes into account the range of forest uses and values. The IFA advocates the development and implementation of strategic and operational management plans on all forest land tenures to guide sustainable forest management and provide for the diverse range of uses and values.

Management plans for public owned forests should incorporate community values in the planning process. Private forest management planning should, as a minimum standard, incorporate public values expressed in government policy and regulations.

Policy 2.7. Timber Production in Native Forests

The harvesting of native forests outside nature reserves is an appropriate long term forest use where management embodies the principles of ecologically sustainable forest management. The IFA advocates that areas of public and private native forests beyond the National Reserve System be managed to integrate timber production with other forest services while maintaining ecological sustainability and other forest values.

Policy 2.8. Forest Regulation and Codes of Practice

Codes of Forest Practice are an effective tool for the regulation of forest management, to meet the expectations of the community and to ensure that forest management activities, such as timber harvesting and roading, contribute to the maintenance of forest values. The IFA considers that all significant forest activities should be subject to codes of forest practice, irrespective of land tenure, that are effectively implemented, regularly reviewed and independently audited. The IFA advocates the ongoing development, implementation, auditing and review of Codes of Forest Practice and associated forest regulations.

Policy 6.1 Environmental services

Forests produce a wide range of non-wood products and services that have been traditionally treated as public goods with no explicit financial value. These include production of clean air, carbon sequestration, ground and surface water management, land rehabilitation, erosion control and biodiversity enhancement. The IFA advocates development of mechanisms to value and integrate of the range of environmental services into forest management plans and proper consideration of these values when land use decisions are made.

Policy 8.1. Wood for bioenergy

Wood and other biomass are potentially renewable energy sources that can reduce greenhouse gas emissions when used to replace fossil fuel energy. The IFA supports the use of wood from both native forests and plantations, from all land tenures, for biomass energy when sourced from sustainably managed forests.

Dr Peter Volker FIFR RPF
President
Institute of Foresters of Australia



Australian Government

Department of the Environment, Water, Heritage and the Arts

Submission response form

Australia's Biodiversity Conservation Strategy 2010 - 2020 (Consultation Draft) addresses a range of important issues designed to protect our plants, animals and ecosystems. We are seeking public comment to assist us to develop a strategy that addresses the community's issues and concerns. To assist us in reflecting on and analysing the many submissions we receive we are asking that the following issues are considered in your response. You are free to provide more detailed responses or responses about other issues if you wish.

Please post or fax completed form to:

Post:

National Biodiversity Response
PO Box 1715
Tamworth, NSW, 2340

Fax:

02 6766 7333

If you require any assistance please call 1800 990 192



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Department of the Environment, Water, Heritage and the Arts

Your Details

Title: (Prof Dr Mr Mrs Ms Other)

If "Other", please specify:

First Name:Peter

Last Name:Volker

Organisation:Institute of Foresters

Industry / Sector : Agriculture Education Forestry Fisheries Health Mining Natural Resource Management Not For Profit Science & Technology Volunteer Water Other

Industry Other (Please Specify)

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Are you of Aboriginal or Torres Strait Islander Origin? Yes No

Please tick this box if you do not want your submission to be published on the Department of the Environment, Water, Heritage and the Arts website.

Please tick this box if you want your submission to be published on the Department of the Environment, Water, Heritage and the Arts website, but you would like to remain anonymous.



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Do you consider the main biodiversity threats identified in the Consultation Draft (see below) to be the most important in reversing the decline in Australia's biodiversity?

- climate change
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- invasive species
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- loss and fragmentation of habitats
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- degradation of habitats
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- unsustainable use of natural resources
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- changes to the aquatic environment and water flows
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- inappropriate fire regimes
strongly agree somewhat agree somewhat disagree strongly disagree not sure

Are there any other threats you think should be addressed?

Maximum 90 words

The views expressed above reflect an overall assessment of Australia's forests and the threats to them. It reflects the findings of the state of forests report (published May 2008) that found that while all of the issues above are important to Australia's forests, their impact is not of equal significance and the evidence is that forest and land management policies and practices are substantially addressing key threats such as invasive species, habitat fragmentation and sustainable use of resources. A copy of the summary of the report is available on the Forests Australia website. While not applicable universally, forest management is generally of a standard that means that some of the threats identified above are not all applicable. There are however great uncertainties regarding biodiversity conservation in the face of climate change and it remains the most significant issue with respect to biodiversity conservation in forests. This when coupled with major fire threats are critical issues for the strategy to address. But IFA advocates a comprehensive approach that considers biodiversity conservation in the context of major threats to human and natural assets. In general this requires a major change in fire management to reflect the need to manage fuel loads. Further information is provided from the IFA policies on the organisations website.



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2. Do you think that the proposed 'priorities for change' (outlined in the 'Making Enduring Changes' section) will be effective at delivering the Strategy's vision to ensure Australia's biodiversity 'is healthy, resilient to climate change and valued for its essential contribution to our existence'?

Maximum 90 words

Z

Do you think the six 'priorities for change' identified are the most important ones? If not what others would you suggest?

Maximum 90 words

Fundamentally, IFA advocates the consideration of policies such as the National Forest Policy statement that reflect a broad based approach to managing Australia's natural resources. We are concerned that the strategy is largely focussed on biodiversity conservation at the expense of a integrated approach to management that reflects the principles of ecologically sustainable development. There are also clear gaps in research and education and an overall reliance on broad statements of good intent that have no clear defined purpose that is relevant to contemporary forest management

Do you have any comments on the vision?

Maximum 90 words



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3. Do you consider that the Consultation Draft:

- promotes a good balance between conservation on private and public lands?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- will facilitate a good mix of regulation and incentives?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides a good balance between marine and terrestrial issues?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides the necessary national framework to produce innovative conservation action?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- has a sufficient focus on institutional arrangements and change?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides sufficient emphasis on improving community awareness of biodiversity?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- addresses the need to implement conservation action at the appropriate scale(s)?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- is applicable to urban and rural environments
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides a clear framework for balancing conservation, social and economic issues?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- adequately deals with the issue of climate change?
strongly agree somewhat agree somewhat disagree strongly disagree not sure



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Do you have any other comments on these issues?

Maximum 180 words

The negative responses reflects the fact that the strategy provides little substantive response to the issues above and is largely general; statements of good intent. We do not see this as an effective policy response, nor do we see any consideration of the range of policy instruments required to address the challenges of meeting economic, social and environmental goals



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4. Do you think the Consultation Draft adequately covers the roles of Indigenous peoples in biodiversity management?

Maximum 270 words

No. The strategy does not address underlying constraints and opportunities for improved sustainable development outcomes on indigenous managed lands



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5. Do you consider that the proposed arrangements for reporting on implementation will be effective in the monitoring and evaluation of the expected outcomes (results) of the Consultation Draft?

strongly agree somewhat agree somewhat disagree strongly disagree not sure

Do you have any suggestions for alternative reporting arrangements?

Maximum 270 words

As suggested in responses to previous questions the actions outlined do not provide a level of specificity that can be assessed as to relevance and success.



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6. To what extent is the Consultation Draft an appropriate national framework to achieve biodiversity conservation benefits, considering the different responsibilities, legislation and funding arrangements between governments.

Maximum 270 words



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7. Is the Consultation Draft likely to encourage a good mix of public and private investment in biodiversity conservation?

strongly agree somewhat agree somewhat disagree strongly disagree not sure

If not how can the Consultation Draft improve in this area?

Maximum 270 words



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8. Is the Consultation Draft sufficiently clear about its role and how it will be implemented?

Maximum 270 words

see previous responses



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9. Does the Consultation Draft reflect the best practice on biodiversity conservation?

Maximum 270 words



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10. Will the Consultation Draft effectively engage private sector interests in long-term biodiversity conservation?

Maximum 270 words



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Do you have any other comments you wish to make on the Consultation Draft?

Maximum 360 words