

# The Institute of Foresters of Australia

ABN 48 083 197 586



25 July 2007

The Reviewer  
RFA Ten Year Review  
Department of Premier and Cabinet  
GPO Box 936  
Hobart 7001

Dear Reviewer

The Institute of Foresters of Australia (IFA) welcomes the opportunity to comment on progress in the implementation of the 1997 Tasmanian Regional Forest Agreement (RFA).

The IFA considers itself uniquely qualified to comment on progress on implementation of the 1997 RFA and the 2005 SRFA (henceforth collectively referred to as the TRFA) as the Institute is the only organisation whose members are professionally trained foresters and represent broader forest managers who support multiple purpose objectives across all tenures in Australia.

The IFA currently has 1320 members, of which 119 are located in Tasmania. IFA members are committed to implementing continued improvements to planning and management systems, which protect current and future values within forests to maximise social and economic benefits whilst protecting natural environments and cultural heritage.

The IFA encourages the Review Committee to read the Institute's policy statements as part of the 10-Year Review process. The IFA considers that these policy statements identify objectives and concerns which must be incorporated by forest managers, governments and communities, when developing informed responses to forest based issues. Copies of the IFA Policy Statements are available at [www.forestry.org.au/ifa/g/g0-ifa.asp](http://www.forestry.org.au/ifa/g/g0-ifa.asp) and include the following:

- [Statement 1.1 - Conservation and Management of Rainforests](#)
- [Statement 2.1 - Forestry Certification](#)
- [Statement 2.2 - Management Private Native Forests](#)
- [Statement 2.3 - Plantations in Rural Landscapes](#)
- [Statement 2.4 - Clearing of Native Forests for Plantations](#)
- [Statement 2.5 - Use of Chemicals in Plantation Forestry](#)
- [Statement 2.6 - Forest Management Planning](#)
- [Statement 3.1 - The Role of Fire in Australian Forests and Woodlands](#)
- [Statement 3.2 - Managing Fire in Australian Forests and Woodlands](#)
- [Statement 6.1 - Environmental Services](#)
- [Statement 6.2 - Forests & Climate Change Mitigation](#)
- [Statement 8.1 - Wood for Bioenergy](#)
- [Statement 8.2 - Wood chips from Australian Forests](#)

*The IFA recommends the Review Committee read relevant IFA Policy Statements and consider the objectives and concerns outlined when assessing progress in the implementation of the TRFA.*



The IFA notes that this 10-Year Review is not designed to address broader community concerns regarding the merit of forest management associated policies. Consequently, the IFA will restrict comment to progress on implementation from 1997 to 2007, including the 2005 Supplementary RFA (SRFA) agreed to by the National and State Governments in association with the Tasmanian Community Forest Agreement.

The IFA acknowledges the contribution and commitment of private organisations, public agencies, individuals and institutions when providing and preparing information necessary to the development of review documents. The nature of such collaborative endeavours provides integration and assessment challenges to authors.

*The IFA recognise the high level of professional commitment shown by private and public providers of information when developing reports which collectively support the 10 Year RFA Review.*

The IFA supports the current review process and considers it appropriate that a more focused and streamlined approach applies to the 10-year review. The process outlined within the TRFA Scoping Agreement (December 2006) is considered critical in ensuring a relevant progress report is prepared in a timely manner.

*The IFA recommends the Steering Committee review progress with implementation of the TRFA and avoid addressing public comment and criticism which seeks to broaden agreed terms or references, definitions or processes to include unrelated and inappropriate forest management and policy concerns.*

It is noted that the 2002 review process was undertaken by the Tasmanian Resource, Planning and Development Commission (RPDC), with final recommendations submitted to Governments in December 2002. However, the IFA noted that it was not until May 2005 that the Australian and Tasmanian governments agreed to address issues and implement recommendations resulting from the 2002 review.

*The IFA recommends the Tasmanian and Australian Governments commit to finalising agreement to recommendations arising from the 10 year RFA review in a timely manner.*

The IFA notes that Attachment 2: Agreed Milestones and Commitments following the 2002 Five Year RFA Review (as detailed in the TRFA Scoping Agreement-December 2006) identifies 96 milestones/actions of which 31 had been completed prior to the 2002 RPDC review. Of the remaining 65, the IFA considers the majority of these involve continuing administrative commitments, which reflect a process based on continued improvement.

The IFA note that under the 2005 SRFA, the Australian and Tasmanian Governments agreed “to fully implement the actions recommended in the Report of the Inquiry on the progress with Implementation of the Tasmanian Regional Forest Agreement (2002), subject to the exception outlined in clause 5”.

*The IFA does not consider it necessary to comment on Attachment 3: Actions agreed to be implemented by the State of Tasmania and the Commonwealth of Australia arising from the 2002 Five Year RFA Review (as detailed in the TRFA Scoping Agreement (December 2006)) as these actions have either been met or reflect ongoing commitments as reflected in the SRFA.*

The SFRA provided a unique opportunity to review and renew the 1997 RFA. This agreement represents negotiated government commitments, which reflect current and evolving policies. The IFA considers it inappropriate to comment on Objective 10: Public Consultation (as detailed in the TRFA Scoping Agreement -December 2006) relating to implementation of progress of the TRFA. It will therefore not be addressing specific commitments as to whether or not they are adequate in meeting



changing industry, social or environmental objectives. However, the IFA notes that significant progress has been made in meeting those commitments as outlined.

*The IFA supports the commitments agreed to be implemented by the State of Tasmania and Commonwealth of Australia as part of the 2005 SRFA and considers them an appropriate response to changes in knowledge, resource developments, industry innovation, technological and market changes, community's expectations and the environment.*

*The IFA notes that significant progress has been made in implementing commitments under the SRFA and that programs are designed to provide long term structural support to meet environmental and productive forest objectives.*

*The IFA considers that the success of initiatives and commitments under the SRFA cannot be adequately assessed at this time, and to do so may distort reporting through a failure to adequately isolate current short-term impacts. Impacts which include the volatility within markets, recent expansion of the reserve system (whose full management and expanded synergetic benefits are yet to be determined), the yet to be fully implemented Private Forest Reserves program, and decisions to phase out conversion on land managed by Forestry Tasmania and Gunns Limited.*

The IFA notes the report 'Sustainability Indicators for Tasmanian Forests: 2001-2006' and the commitment to continue to consider public comment as part of the 10-year RFA review (Clause 10 of the Scoping Agreement).

The IFA considers the 2001-2006 Sustainability Indicators provide a comprehensive, practical and relevant overview of progress in meeting TRFA commitments. While reporting of progress has changed over time, and in doing so has on occasion lead to inconsistencies regarding the two five year review periods, the indicators should be used as a basis for assessment.

The IFA recognises the Sustainability Indicators as being a national set of agreed indicators, (which meet international obligations under the Montreal Process Implementation Group) modified to reflect Tasmania's capacity to report. In this context, progress in meeting the TRFA commitments should include comparisons to progress within RFA regions outside Tasmania. In doing so, legitimate concerns raised within Tasmania can be considered in line with broader progress within other States.

*The IFA recommends the Review Committee consider progress in meeting RFA commitments along side those achieved in other States in order to assess whether progress in Tasmania met or exceeded those achieved nationally.*

In regards to specific Indicators, Table 1 provides comments, which are based on the Sustainability Indicators for Tasmanian Forests 2001-2006 documents.

Table 1:

Criterion	Comment
1 Ecosystem diversity	<p>The IFA considers it appropriate that the Tasmanian- forest estate includes both native and plantation forests, as both resources provide ecological benefits at different scale. These benefits can favour specific species or communities, and a holistic approach is appropriate when assessing such values.</p> <p>The IFA acknowledges that the SRFA addresses future conversion limits through the Permanent Native Forest Estate Policy (Clause</p>



		<p>45). With recent decisions by Forestry Tasmania and Gunns Limited regarding cessation of conversion of native forest, it is likely that the majority of future conversion activity will be by non-forest land managers seeking conversion to non-forest agricultural activities. The IFA considers that such activities should be monitored in an appropriate and cost-effective way, to ensure natural and cultural values on private land are protected, and to ensure ongoing compliance.</p>
	Species diversity	<p>The IFA acknowledges that the current knowledge regarding vascular plants (more than 90 per cent) and vertebrate fauna (60 per cent) is high by world standards.</p> <p>The IFA acknowledges that improved identification, monitoring and management systems have reduced the risk of extinction for a number of species. However, areas of concern remain and the IFA supports initiatives that address these concerns by developing and implementing economically responsible and practical solutions.</p>
	Genetic diversity	<p>The IFA recognises the benefits that formal and informal reserves provide for maximising genetic diversity within natural environments. These reserves provide genetically diverse and representative areas which can assist in decolonisation after significant events (such as fire or prolonged drought) or as a response within species to climate change.</p>
2	Maintenance productive capacity of forest ecosystems	<p>The IFA considers that maintaining a commercially viable resource is necessary when managing multiple use forests. Access should be provided to timber and non-timber forest resources to support sustainable and productive enterprises.</p> <p>Maintaining an internationally competitive timber resource relies on maintaining a critical baseline forest area necessary to meet current and future fibre production requirements.</p> <p>The IFA remains concerned that continuing contraction of land available for timber production reduces the flexibility necessary to achieve multiple use objectives.</p> <p>The IFA does not consider plantation and native forest production as mutually exclusive. Rather as complimentary resources that support multiple use objectives.</p>
3	Ecosystem health and vitality	<p>The IFA recognises the potential for active and unmanaged phytosanitary threats to jeopardise the health and vitality of forest ecosystems and supports measures developed to address such threats.</p> <p>The IFA remains concerned that active and passive tourism into and within forests may inadvertently encourage the spread of native and exotic weeds, pests and pathogens. To address this concern, the IFA recommends that educational material be prepared for potential forest users highlighting practices to mitigate the potential spread of</p>



		<p>such threats.</p> <p>Climate change poses a unique challenge to forest managers in that the intensity and frequency of fire events is likely to increase over time. These events have the potential to modify species and community distributions and may place at risk the long term viability of forest communities.</p> <p>To address this threat, the IFA supports and encourages active fire mitigation practices, such as hazard reduction burns, and the establishment of fuel reduced zones along major access routes through forested areas.</p> <p>The IFA recommends that the Tasmanian Government consider further support to ensure suitable levels of controlled burning activities are undertaken to mitigate the threat of wildfire.</p>
4	Conservation and Maintenance of Soil and Water	<p>The IFA recognises that soil and water values are impacted through a combination of natural and artificial land uses at the local and regional scale over time. Many of these impacts result from natural geomorphologic influences, as well as recent human activity. Consequently, the IFA recognises that it is difficult to quantify such impacts at a micro level and supports the development of processes which aim to evaluate broader impact assessments over time and space.</p> <p>The IFA considers soil and water values have been adequately protected through the adoption of both legislative and voluntary practices currently integrated within forest management systems.</p> <p>The IFA considers the monitoring of soil and water values is currently at a practical level. An intensification of monitoring practices cannot be justified at present, and the benefits of ramping up current measures would be questionable. However, the IFA would support further refinements to monitoring practices to better identify areas of concern and address specific forest management issues which may impact on soil and water values.</p> <p>The IFA notes that prescriptions applying to forest activities are significantly more rigorous than those applying to non-forest agricultural land.</p>
5	Forest contribution to Global Carbon Cycles	<p>The IFA notes that this criteria is reported at the national level and reflects native forest balance only.</p> <p>The IFA questions the exclusion of plantation forests when considering this criteria. The Tasmanian Plantation Estate is reported at 254,207 hectares (Private Forests Tasmania Information Paper No. 1: June 2007 and available at <a href="http://www.privateforests.tas.gov.au/">www.privateforests.tas.gov.au/</a>).</p> <p>The IFA questions why the impact of wildfire events is not reported when such activities can have a dramatic impact on the contribution</p>



		to global carbon cycles.
6	Maintenance and enhancement of long term multiple socio-economic benefits to meet the needs of societies.	<p>The IFA remains concerned that the previous level of reporting by the Australian Bureau of Statistics (ABS) on forest products is no longer carried out.</p> <p>The identification of forest specific data is critical when determining progress on the implementation of the TFRA and associated programs.</p> <p>The IFA recommends the Australian Government commit to funding the ABS to continue reporting of forest related data to meet implementation requirements.</p>
7	Legal institutional and economic framework for forest conservation and sustainable management.	<p>The IFA recognises that forestry, including the establishment of a tree plantation, is a legitimate land-use activity which provides rights which are consistent with broader agricultural activities. These rights require land managers to prevent detrimental impacts on natural and cultural values, as well as those on neighbouring lands.</p> <p>However, the IFA notes that, unlike other land use activities, forest operations must be consistent with the <i>Forest Practices Act 1985</i> (the Act) and the Forest Practices Code 2000 (the Code).</p> <p>The IFA accepts that the principle of reporting against these frameworks may be open to debate in regards to whether the assessment provides an accurate reflection. Whilst the IFA acknowledges that the process relies on a qualitative assessment which may bias reporting, the IFA also accepts that when applied consistently, such bias does not create a misrepresentation of the data.</p>

The Chairman of IFA Tasmanian Division, Andrew Wye, would be pleased to further elaborate on any matters you may wish to clarify. He is available on mobile phone 0407 105 133.

Yours faithfully

  
 J. Adrian O'Loughlin  
 Executive Director

