

**Institute of Foresters of Australia (IFA) and Australian Forest Growers (AFG)**  
**Submission to NSW Department of Planning, Industry and Environment**  
**RE: Koala Habitat Protection Guideline (2019)**

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## Points of concern with NSW Koala SEPP 2019 and Guideline

- The NSW State Government seeks to greatly expand and protect significantly more areas of *potential* koala habitat in NSW without an appropriate level of consultation with affected stakeholders, such as farmers, landowners, developers, timber and mining industries.
- The new Koala SEPP 2019 and Guideline is inconsistent with the NSW Government policy of 'red tape reduction', as there are already four pieces of legislation designed to protect native vegetation as habitat for native animals, including threatened species (BC Act, LLS Act, Forestry Act and PoEO Act). **This new SEPP would make five and is an unnecessary duplication of NSW law.** It overrides the Land Management Code thereby removing all flexibility of farmers to manage their land appropriately for multiple outcomes.
- The previous SEPP (SEPP 44) sought to protect populations of koalas in the urban and peri-urban coastal strip from development. The Koala SEPP (2019) seeks to **protect and recruit areas of potential koala habitat** where an actual koala may not have been recorded for up to 18 years.
- The definition of *core koala habitat* has been updated **to make it much easier for areas to be identified as core koala habitat. It removes the need for koalas to be actually present and expands the number of koala feed tree species from just 10 species to 123.** In practical terms, this definition will effectively classify most forested land in NSW as *core koala habitat*, thereby removing it from most forms of agricultural, forestry and mining production whether it is in area of a proposed development or at a far distance from this.
- The changes to the Koala Habitat Protection SEPP (2019) and Guideline provide vexatious activists with increased opportunity to use the court system to delay and frustrate legitimate forest operations within NSW. This additional encumbrance of unnecessary legal expenses and burden on the resources of NSW court system has great potential to stifle economic activity across the state. Consequently, this would be to the detriment of the economy and social good will towards the intent of the SEPP in rural areas as well as peri-urban and urban fringes.
- The Koala SEPP is supported by predictive maps, not field verified and with no mechanism for a landowner to contest them. Both maps are inaccurate and include some plantations, non-native species, individual paddock trees, non-tree vegetation, avocado farms, macadamia plantations, avenues of jacarandas in Grafton, etc. For the SEPP to obtain widespread community support as legislation that meets societies expectations for koala protection, the government (representing society as a whole) rather than individual landholders should bear any costs incurred to validate incorrect mapping.
- The Koala SEPP relies heavily on a *Guideline* to provide clarity around various definitions and processes. SEPP became law on 1 March 2020 and despite the Guideline not been agreed to, advice from the Minister for Planning is that Councils can implement the SEPP using the draft Guidelines. This makes a mockery of the consultation process. We also understand that the Guideline has been developed with no consultation with representative organisations, like ourselves or Timber NSW, due in large part to inadequate consultation in its preparation and enactment of the Koala SEPP 2019.
- In developing Koala Plans of Management (KPoM), the Koala SEPP 2019 and Guideline allows Councils to create linkages across the landscape between areas of *core koala habitat*, even across cleared paddocks. This provision does not engender public confidence in the validity of the zoning and would serve to undermine public confidence in any KPoM that included such areas of what is clearly not koala habitat.

- Ministerial direction that all *core koala habitat* must be rezoned as E2: Environmental Conservation will prevent farmers, landowners and developers from undertaking land use such as agriculture, mining, forestry, residential or business development, etc.
- Private Native Forestry operations are not permitted in *core koala habitat* and independent legal advice obtained by stakeholder representative groups highlights that without grandfathering provisions in the Koala SEPP 2019 it would not offer the exemptions for PNF that the government suggests it does.
- If an agricultural area is identified as *core koala habitat*, it becomes *Sensitive Regulated Land* and no longer covered by the *Local Land Services Act*. Routine agricultural activities, such as fence line clearing, building dams, roads etc are either not permitted or require development consent.

## Background

The IFA/AFG has many active members across NSW in forest management, landscape and natural resource management, national parks and conservation management, science and research roles, consulting, teaching and forest growing enterprises. The latter include both large and small scale public and private enterprises – both plantations and areas of private native forest under management - from large scale forests to small scale farm forest plots and native forests.

Forestry professionals, informed by the science of natural resource management, play a crucial role in shaping the future of forests. We advocate balanced land use that meets society's needs for sustainable forest management, timber supply, and achieves both flora and fauna conservation outcomes.

Forestry science recognises the multiple use values of forests including their important role in providing habitat for native fauna including koalas. State legislation and industry codes of practice recognise these multiple values and mandate the sensible planning of all forest operations to include reasonable attention to all such values so that our forest resources are sustainably maintained for future generations.

## Conservation of koalas

It is clear that koala populations will be under stress in localised areas of NSW after the extent and severity of bushfires in recent years including this current 2019/20 season. It is also clear that the revised SEPP would have offered no better protection to vulnerable koala populations during the 2019/20 fires than the previous SEPP 44 as the extent of the mega-fires across NSW burnt significant areas of protected lands that would not be subject to development applications that the Koala SEPP 2019 purports to address.

The IFA/AFG position is to support legislation that is soundly based on science. The Koala SEPP 2019 and Guideline has the potential to be vexatiously misused by extremist activists to argue that all native forests in NSW be mandated as koala conservation habitat. We fully support the identification of very significant forest areas that support viable populations of koalas in numbers that are genetically significant for their long term survival and prosperity. This is a sensible prioritisation of limited State resources to achieve very positive conservation outcomes.

Individual koalas or other small populations observed or detected in less significant areas are still subject to the clear protection obligations of Forest industry Codes of Practice. The latter includes the specific “Koala Code of Practice: Forest Harvesting in New South Wales” developed in 2014 by

the NSW Government's Forest Industries Taskforce. This code of practice emphasises the *bona fides* of the industry to act responsibly and be seen to act responsibly. Likewise please refer to the Addendums attached that provide a range of policy positions for both IFA and AFG (with key passages highlighted) to clearly indicate that our professional members respect the need to manage forests sustainably to protect both conservation and biodiversity values while providing economic returns from renewable timber, fibre and carbon products that meet society's needs.

### *Examples of the over-reach of Koala SEPP 2019 and Guideline*

Individual koalas have been observed crossing the Princes Highway south of Eden in November 2019 (Vic Jurskis, respected and well published Forestry research scientist, pers. comm.) and the Snowy Mountains Highway near Blowering Dam east of Tumut in November 2016 (confirmed by NSW National Parks Area Manager Matt White and reported by ABC Riverina on 6 December 2016). Koalas had been reported as extinct in these areas with the previous sighting in the Batlow area being in 1940 (75 years prior to the 2016 sighting). It would be appropriate that such sightings would initiate follow up monitoring so that if a new colony became established it would then trigger an appropriate conservation management response. However, under the Koala SEPP 2019 and Guideline, these areas would be immediately declared core koala habitat even though the single sighting may not be indicative of a population being present or that the area is likely to be re-colonised – in scientific terms, this is a disproportionate response.

Likewise, one of Australia's leading farm foresters in the New England area of NSW could be adversely impacted by the over-reach of the provisions of Koala SEPP 2019 and Guideline. This farming family continues very significant revegetation work started by the previous generation in the 1980's-1990's. The family takes great pride in the sighting of koalas on this 5<sup>th</sup> generation property after a period of close to 100 years since family records indicate koalas were hunted to localised extinction in this area in the early 1900's. This farmer harvests from his planted radiata pine forests for farm timbers and as a diversified source of income in times when other crops and livestock offer poor returns in seasons such as during the last few years of severe drought have provided. However, as the farm also retains remnant native forest, koalas attracted to the property by the palatable foliage of young planted trees and observed in the radiata pine might also move into the remnant native forest trees. It would defy natural justice if this farmer was prevented from harvesting his planted trees because the property was declared core koala habitat. This farming family is very proud of their conservation contributions as active members of their local Landcare and Australian Forest Growers and their pride in the rejuvenation of the family property through strategically planting about 15% of the property to trees should be applauded. All their forest harvesting operations are undertaken according to the Koala Code of Practice as they want to maintain the intermittent presence of koalas on the property and take great pride in their stewardship of their land.

### *The science behind koala numbers and conservation status*

IFA/AFG is pleased to note that the innovative research work of the NSW Government's DPI Forest Science Unit's Dr Brad Law is included as one of the survey options on page 44 of the Koala Habitat Protection Guideline. Dr Law's research publication findings including

***Law BS, Brassil T, Gonsalves L, Roe P, Truskinger A, McConville A (2018) Passive acoustics and sound recognition provide new insights on status and resilience of an iconic endangered marsupial (koala *Phascolarctos cinereus*) to timber harvesting. PLoS ONE 13(10): e0205075.***

***<https://doi.org/10.1371/journal.pone.0205075>***

provide robust science to question the often speculative and unsubstantiated claims of koala extinction or degree of endangerment in NSW and Australia. We question the validity and motivations behind emotive claims that are attached to NGO fund-raising exercises in both social media and traditional media.

IFA/AFG members welcome the broad community support for the effective conservation of both flora and fauna in our forested environments. However, our expectation and policy position is that all government policy, legislation and codes of practice are under-pinned by sound and robust science.

Given the protections afforded by the previous Koala Sepp – 44 and the “Koala Code of Practice: Forest Harvesting in New South Wales (2014)” we question the need for the greatly expanded reach of the Koala SEPP 2019 and Guideline. This is particularly so given its significant potential to be vexatiously used to unduly harass private land-holders and farmers undertaking private native forest operations or forest operations in private plantations. It is unreasonable to expect rural landholders to incur substantial additional costs to challenge erroneous mapping of their land as core koala habitat with its implications of their continued productive use of that land. Such land-holders already have to meet considerable operational requirements under the previous Koala SEPP 44 and the Koala Code of Practice, which we argue are effective and sufficient to afford appropriate protection to all koalas in NSW.

## *Background to who IFA/AFG is and who we represent*

### About the IFA

The Institute of Foresters of Australia (IFA) is the professional body representing over 1200 members who are forest scientists, professionals and/or managers operating in all aspects of forest and natural resource management, including forest conservation, throughout Australia.

Forestry professionals, informed by the science of natural resource management, play a crucial role in shaping the future of forests. We advocate balanced land use that meets society's needs for sustainable forest management, timber supply, and achieves both flora and fauna conservation outcomes.

The Institute of Foresters of Australia (IFA) and Australian Forest Growers (AFG) merged in early 2019. IFA was founded in 1935 as a professional association that represents members who:

- Are engaged in all branches of forest management and conservation in Australia.

Or

- grow trees for timber and other products and benefits, on small and large holdings, on farms, in plantations and in private native forests include farmers and foresters, plantation investors and investment companies, researchers, consultants, tree and equipment suppliers, industrial forestry companies, urban dwellers with rural land, small block holders, and tree growing enthusiasts.

The membership represents all segments of the forestry profession, including public and private practitioners and growers. Members are engaged in many aspects of forestry, nature conservation, resource and land management, research, administration and education.

The IFA aims:

- To advance and protect the cause of forestry
- To promote professional standards and ethical practice among those engaged in forestry
- To promote social intercourse between persons engaged in forestry
- To publish and make educational, marketing and other materials available to those engaged in forestry
- To provide the services of the Institute to forestry organisations inside Australia and in overseas countries.
- There are Divisions of the IFA in each State and the Australian Capital Territory.

### About the AFG

Established in 1969 as the Australian Forest Development Institute, Australian Forest Growers (AFG) merged with the Institute of Foresters of Australia (IFA) in 2019. The AFG is a national association that represented and promoted private forestry, farm forestry and commercial tree growing interests in Australia. AFG members grow trees commercially for wood or non-wood products and are located in all corners of Australia and our membership ranges across a broad spectrum from large to small scale, managing both natural and planted forests.

AFG Members grow trees for timber and other products and benefits, on small and large holdings, on farms, in plantations and in private native forests include farmers and foresters, plantation investors and investment companies, researchers, consultants, tree and equipment suppliers, industrial forestry companies, urban dwellers with rural land, small block holders, and tree growing

enthusiasts. AFG members are united in the belief that growing and managing trees on private land for timber and other commercial purposes has a broad range of economic, environmental and social benefits for their own enterprises and for the local and wider community. AFG was established to promote this view, to provide support for those involved in commercial tree growing and to help develop effective policy to underpin these endeavours.

## Addendum 1. IFA Policy statements with relevance to members policy positions on Koala SEPP 2019 and Guideline

### Conservation of Remnant Native Woodlands - IFA Forestry Policy Statement 1.6

The Institute of Foresters of Australia (IFA) advocates the need for long-term substantial efforts to improve the conservation and management of remnant native woodlands in agricultural areas. Land managers of public and private land should be encouraged to adopt a strategic approach to the conservation of remnant native woodlands. **Public authorities should use equitable, incentive-based schemes based on sound scientific and economic principles to enhance the conservation of these areas.**

#### ***The Issue***

Since European settlement Australia has lost significant areas of native woodlands. Many of these remaining woodlands are degraded and under threat from further clearing, rising saline water tables, livestock, nutrient enrichment, soil structural decline, altered fire regimes and exotic weeds.

In agricultural landscapes remnant native woodlands provide important ecosystem services and assist agricultural productivity. Some woodland ecosystems are the most poorly conserved ecosystems in Australia, so a sustained and urgent effort is needed to improve the conservation and management of these areas.

#### ***Background***

This policy addresses areas of remnant native woodlands that are relatively small intact areas within a predominantly cleared landscape. Recently, Australian legislative controls have aimed to prevent further clearing of native vegetation. However, as mentioned above, these woodlands are still under threat.

**A strategic approach is required to assess conservation values of remnant native woodlands and to provide encouragement and incentives to conserve the more valuable remnants.**

Factors to be considered in this assessment include:

- The degree to which the woodland ecosystem and its values have been lost in the landscape
- **Its long-term viability and the cost of conservation with appropriate management**
- Its size and the potential to connect with other areas of viable native woodlands
- **The need to maintain genetic pools to ensure that native species and communities continue to evolve with climate change.**

#### ***Policy***

The IFA supports and encourages:

- **Land managers participating in public policy development and landscape or catchment level planning to improve the conservation and management of remnant native woodlands**
- **The use and development of scientific research in the assessment of conservation values**
- **Public funding of scientific research into the conservation of remnant native woodlands, impacts of disturbances, and ways to conserve and enhance them**
- Incentive-based approaches, including stewardship payments, to enhance conservation, management and restoration of viable remnant native woodlands

- Regulatory authorities to recognise the differences in conservation status of areas of remnant native woodlands and consider trade-offs to achieve optimal biodiversity outcomes
- Community-based organisations, such as Landcare and Greening Australia, working with landowners to improve the conservation and management of woodlands.

The IFA considers that:

- There is need for substantial and sustained efforts, involving incentive-based and regulatory means, to improve the conservation and management of remnant native woodlands in agricultural areas.

## Clearing of Native Forests for Plantations - IFA Forestry Policy Statement 2.4

The Institute of Foresters of Australia (IFA) advocates that plantations should be developed through balanced environmental, social and economic objectives. Where possible, plantations should be established on cleared agricultural land with minimal clearing of remnant native forest.

### *The Issue*

Plantation development and expansion requires sufficient areas of cleared land. Remnant native vegetation can have a negative impact on the establishment, growth and management of plantations. However, clearing mostly intact areas of native vegetation for plantations can threaten regional conservation objectives.

### Background

In the past, many of Australia's plantations were established by clearing native forest. More recently, most plantations have been developed on marginal and cleared agricultural land.

Most agricultural land suitable for plantation forestry also includes areas of remnant native vegetation that varies in size from individual trees to substantial areas. These areas and their impacts must be considered in new plantation developments. These trees may impede plantation establishment and growth, but in some circumstances may have important conservation values (such as habitat for birds and mammals). Larger areas of native vegetation have greater conservation benefit and can generally be accommodated in large plantation areas. In some instances, maintaining native vegetation within plantations can benefit stand productivity and important ecosystem processes.

Most States and Territories have legislation to protect significant native vegetation from clearing. However, this legislation can be difficult to implement at a local scale, and can restrict the development of plantations on agricultural land. Plantation developers need to work to achieve a balance between conserving native vegetation and clearing to establish plantations.

### Policy

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
- Appropriate legislation governing the clearance of native vegetation.

The IFA considers that:

- Clearance of small areas of remnant vegetation within plantation developments may occur if these areas have been identified to have little or no conservation significance, are well-represented regionally, or that are diseased or degraded
- Small scale "trading off" of cleared and uncleared areas at a local scale, including revegetation with native species, may take place to create efficient and/or consolidated plantation areas or to complement conservation goals.

## Management of Private Native Forests - IFA Forestry Policy Statement 2.2

The Institute of Foresters of Australia considers that private native forests provide important benefits to the community and advocates improved institutional support to encourage sustainable forest management.

### The Issue

Many of Australia's private native forests are not well managed. There is a common lack of government policy and institutional support for the management of private forests and the marketing of wood from private forests is generally poorly coordinated. Landowners and the community often don't realise the potential environmental and economic contribution of private forests. This leads to the conversion of private forests to other land uses including agriculture and urban development.

### Background

Private native forests (including woodlands) are those in freehold ownership and those in public ownership, but privately managed through leasehold arrangements. These forests are owned by a large number of landowners, with varying sizes of ownership. They are used for a wide range of purposes including sawn timber, firewood and speciality timbers, as well as grazing, water production and biodiversity conservation.

There are several key aspects of sustainable forest management of private native forests, including:

- Policy, legislative and institutional guidelines to encourage conservation and sustainable management, including right to harvest arrangements and Codes of Forest Practices
- Valuation of environmental services or incentives to encourage retention and sustainable management through stewardship arrangements
- Accurate inventories of forests including the extent, distribution, types, uses and values
- Competent forest management advice from qualified professionals to private landholders
- Promotion of markets, market information and encouragement of investment and infrastructure
- Property management plans that include the forested land component and the requirements for
- sustainable management
- Promotion of private native forest management as a sustainable and profitable management system
- Management and economic measures that protect high conservation value forest.

### Policy

The IFA supports and encourages:

- Sustainable management of private native forests to provide renewable timber resources and to maintain environmental and conservation values
- Development of an appropriate policy, legislative and institutional framework that promotes profitable and sustainable management of private native forests for production, environmental and conservation values

- Recognition of the stewardship role of private forest owners and the need for appropriate incentives and environmental service payments to encourage sustainable forest management
- Application of appropriate management plans and Codes of Practice for timber harvesting to protect the many values of private forests
- Regular inventories of privately managed forests to monitor their composition, extent and condition.

## Forest Management Planning - IFA Forestry Policy Statement 2.6

The Institute of Foresters of Australia (IFA) advocates the development and use of strategic and operational forest management plans to guide sustainable forest management.

### *The Issue*

Forest management plans provide for the diverse range of forest uses and values. Management occurs at several levels: from State and regional, to operational, depending on the relevant law and land tenure. In recent years there has been an increasing demand for stakeholder participation in plan development for public forests, as well as for effective planning for forest management certification schemes.

### Background

Management plans are drawn from data from extensive environmental and resource surveys and inventories.

They assist in the balanced use and care of forests to meet conservation, resource use, social and cultural requirements.

In Australia and internationally there is recognition that sustainable forest management requires meaningful and effective input from stakeholders who have an interest in forest management or who will be affected by management decisions. Preparation of forest management plans for public land now includes input from botanists, zoologists, ecologists, soil conservationists and other specialists. With more production forestry occurring on private plantations, foresters need to consult stakeholders such as local government, catchment authorities and local communities in plan development.

Generally, strategic forest management plans describe the forest area including its resources, uses and values. They identify any legal requirements and planning requirements, and identify the management objectives.

Strategic plans describe the strategies, zoning and any prescriptions needed to achieve objectives and to protect values. They provide opportunities for public comment and participation in the planning process and monitor and assess the plan, reviewing after five to ten years.

Operational forestry plans generally describe the area including topographical features and boundaries. These plans outline the operation needed to achieve desired outcomes and indicate any significant sites to be excluded from the forest operation.

### **Policy**

The IFA supports and encourages:

- Forest planning appropriate to the scale, ownership and type of forest and its management intent
- Monitoring and reviewing strategic management plans every five to ten years, in addition to regular auditing of operational plans
- Appropriate criteria and indicators as a framework for monitoring sustainable forest management.

The IFA considers that:

- Strategic forest management plans should be integrated and holistic, taking into account the risks and threats to the range of environmental, cultural, social and economic forest values at a landscape level, as well as the management strategies on any adjoining forested land
- Operational plans should encourage operational forest management and protection of important values
- Forests have multiple and diverse uses and values that need to be sustainably managed
- Strategic plan development for forests will benefit from appropriate stakeholder input on all tenures.

## Addendum 2. AFG Policy statements with relevance to IFA/AFG members policy positions on Koala SEPP 2019 and Guideline

### Policy 1: FORESTRY IS A LEGITIMATE LAND USE

#### Australian Forest Growers seeks:

- to achieve recognition by all levels of Government and the community that appropriate placement and management of trees in the landscape provides multiple benefits, including environmental solutions addressing salinity, declining water quality and biodiversity;
- to ensure that the associated costs and benefits of these environmental solutions are apportioned equitably;
- to pursue the acceptance of ecologically sustainable forest management as a legitimate agricultural land use; and
- to promote an enhanced relationship between forestry and other forms of agriculture.

#### Preferred Outcomes

- Broad agreement that all rural land users will be assessed within planning and regulatory frameworks against the same set of economic, social and environmental criteria and on the basis of well-established and broadly accepted science.
- An analytical framework for natural resource management capable of assessing forestry as a real alternative or complement to other dryland agricultural crops by taking into account the positive and negative effects of all land uses and their respective contributions to social, economic and environmental objectives.
- Development of direct and lasting linkages between plantation and farm forestry strategies and natural resource management goals.
- Robust science forming the basis of future land use policy (both productive and environmental) and fair and equitable treatment of all rural land use options.
- Increased understanding of complementary strategies involving agriculture, forestry and farm forestry, and of desirable opportunities for mutual land use benefits, including environmental and natural resource protection, commercial sustainability and on-farm energy and greenhouse gas management.

## Policy 2: DEALING WITH PUBLIC PERCEPTIONS OF FORESTRY

### Australian Forest Growers seeks:

- a coordinated, cooperative and modern approach by industry at local, state and national levels to promote private and native forest management, including responding to media misinformation and promoting individual case studies in regional media;
- that the Australian Government commits to funding the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) to continue to regularly monitor and publicly report on the social, economic and environmental benefits and impacts of plantations in regional Australia; and
- that ABARES broadens their scope to publicly report on the socio-economic and environmental benefits and impacts of sustainable private native forest management.

### Preferred Outcomes

- Through campaigning and promotion, the public considers forestry and forest management as an important industry that contributes to the triple bottom line in Australia.
- ABARES is maintained as the principal, centralised organisation for researching, preparing and disseminating information relating to the environmental and socio-economic aspects of forest and timber industries in Australia.
- ABARES is provided with core and ongoing government funding to deliver information on advances in forestry science and monitoring that can be interpreted by the general public.
- All levels of the forestry industry work together to promote the sector and respond immediately and appropriately to misinformed media stories and publications.
- Organisations promoting forestry and timber products are assisted with a proportionate level of support and resources to access media channels and provide a balanced view of plantation and private native forestry issues.

### Policy 3: PRIVATE NATIVE FORESTRY

#### Australian Forest Growers:

- recognises that production native forests are the most benign and long term sustainable primary production system in Australia;
- recognises that profitable production from native forests is an integral part of good quality forest management;
- seeks to achieve community recognition and support for sustainably managed private native forests as a renewable resource for both production and conservation outcomes;
- promotes and advocates public policy conducive to the profitable and ecologically sustainable management of private native forests to the extent of the elimination of the pernicious effect of sovereign risk;
- promotes and advocates public policy that provides a simple incentive system that rewards good stewardship of actively managed private native forest holdings;
- seeks that stewardship incentives should be part of any change of law or regulation that detracts from prior use of the forest area;
- seeks that stewardship incentives should be available if any change of law results in loss of commercial return to the landowner;
- encourages its members and the wider forest-growing community to maintain and enhance the environmental values of private native forests, especially in regard to biodiversity, wildlife habitat, land water protection and energy management;
- promotes the potential of well managed private native forests to contribute to regional and national development through the profitable production of wood and other products; and
- seeks that social, environmental and economic outcomes attained through managing private native forestry are recognised.

#### Preferred Outcomes

##### *Inventories and evaluation*

- Completion of reliable and accurate inventories of the extent, distribution, types, uses and values of private native forests, to assist in the formulation of public policies and programs affecting private forest resources.
- National, state and local governments should provide financial incentives to landholders to undertake such inventories.

##### *Legislation and regulation*

- Recognition of legitimate forestry production purposes and associated activities, including sustainable timber harvesting, as existing and continuing lawful use of naturally afforested private agricultural landholdings;
- Operation of private native forests under uniform codes of practice, acceptable to AFG, with reasonable public compensation for all reservations outside of the public estate;
- Official acceptance that where a Regional Forest Agreement is in place, private native forests not reserved under that process may, subject to compliance with uniform codes of practice, be managed for commercial forestry purposes; and
- Official acceptance that compliance with Codes of Forest Practice constitutes compliance with all Australian, State and local regulations and controls affecting the regeneration, management and harvest of private native forests.

##### *Silvicultural and environmental management*

- Delivery of education and training in silvicultural and environmental management of native forests, for private forest owners and managers extending to the development of property

management plans that include the expansion of commercial native forest onto previously cleared land.

- Provision of competent forest management extension and advisory services to private landholders.
- Good stewardship of actively managed private native forests, recognised by government policy and incentive programs. This is particularly important in the situation where any change of law results in loss of commercial return to landholders.

#### ***Marketing silvicultural yields***

- Collection and dissemination of information on prices and marketing of forest products.
- Promotion of markets and encouragement of investment in processing infrastructure to enable utilisation of the full range of native forest products in silviculturally balanced proportions. This would provide effective capture of silvicultural benefits and productivity improvements to the remaining forest stand, allowing for economically viable utilisation of all thinnings and residues produced as an inevitable silvicultural surplus (such as for solid and liquid fuels).

#### Policy 4: ENVIRONMENTAL SERVICES MARKETS

Australian Forest Growers will pursue the development of policy frameworks that recognise and reward environmental services provided by private native forests and plantations. This should include mechanisms for assigning meaningful economic values to these services, and for achieving community recognition of such values.

More specifically, Australian Forest Growers seeks the establishment of an Environmental Services Market framework to put economic values on the contribution landholders make to boosting biodiversity, mitigating salinity and improving land, air and water quality through the planting of trees and management of new and existing trees and forests.

##### Preferred Outcomes

- The environmental services provided by plantations and native forests are recognised and rewarded in market based frameworks, alongside commercial benefits. These should include, but not be limited to, their role in mitigating salinity, promoting biodiversity, improving land, air and water quality and contributing to aesthetic and amenity values.
- The development of useable, transparent rules and market systems that allow all forest growers (including small-scale growers) to access and participate in environmental services markets.

## Policy 5: NATURAL RESOURCE MANAGEMENT

In respect of natural resource management (NRM), Australian Forest Growers seeks:

- improved public and private investment in sustainable land management initiatives through joint partnerships between the two sectors;
- an increased application of forest and land management practices that combine production and conservation objectives in order to create better value for money in achieving public and private benefits;
- to increase the capacity of landholder groups, farm forestry networks, NRM agencies and other land managers to promote and adopt innovative, best practices of forest and land management, for example through the provision of government extension and technical support services;
- that NRM initiatives and investment strategies incorporate farm and plantation forestry projects in recognition of the NRM benefits that will be attained from intelligent, scientifically informed placement and management of trees in the landscape. Suitable forest management projects can and should be used to address problems of soil salinity, soil erosion, declining water quality, the maintenance of tree cover and biodiversity, for example, while also capitalising on commercial revegetation opportunities;
- the development of on-ground forest initiatives in lower rainfall areas (i.e. less than 600mm per annum), including catchment-scale pilot schemes, such as “The Action Plan for Tree Farming in Western Australia”; and
- that Australian and State Governments continue to work with plantation growers and processors to develop policies and incentive measures (including tax provisions) to encourage positive NRM outcomes. Commercial plantation forests have the capacity to provide an even greater contribution to the achievement of cost effective natural resource management outcomes

### Preferred Outcomes

- Commitment by Australian, State and Territory Governments to maximising opportunities to develop public- private partnership investment in farm and plantation forestry. This can be achieved through land management planning that matches enterprise development with improved environmental and productivity outcomes.
- Recognition within Australian, State and Territory Government NRM programs of the positive environmental outcomes that can be delivered by well-designed and managed farm forestry.
- Establishment and evaluation of NRM catchment scale pilot schemes and other on-ground initiatives in lower rainfall areas.
- Continuing availability of technical advice provided or supported by government for landscape site design to achieve positive NRM outcomes.
- Regional NRM groups making regular use of forestry expertise in development of NRM plans and investment strategies.
- Whole-of-government approach to implementing NRM outcomes.
- Greater than 100% tax deductibility for on-ground environmental works.
- Promotion of the environmental benefits of forestry and farm forestry, in areas such as water quality improvement, salinity prevention and control, erosion prevention and control, biodiversity and carbon sequestration

## Policy 6: FORESTRY FOR MULTIPLE PURPOSES

Australian Forest Growers advocates Australian Government investment in multi-purpose forestry, specifically using the Great Barrier Reef (GBR) catchments in north-eastern Australia as the pilot for a larger, Australia-wide initiative in forestry investment for multiple purposes.

AFG advocates a strong focus on the utilisation of integrated forestry for multiple outcomes that includes:

- proactive repair of riparian landscapes to improve water quality and river health, both *in situ* and downstream thereby benefiting ecology, fisheries and downstream assets like the Great Barrier Reef;
- positive and community friendly responses to climate change by using production forests as carbon sequesters;
- managing salinity, especially to maintain or re-establish potable water supplies;
- enhancing biodiversity and ecosystem resilience;
- production of sustainable forest products; and
- provision of sustainable sources of biomass for renewable fuels and electricity.

### Preferred Outcomes

- A proactive approach by all levels of government to integrate policies regarding natural resource management outcomes, farm forestry profitability and climate change adaptation.
- Programs that ensure value-for-money in public investment in improved landscape health, effective climate change adaptation and sound industry development outcomes.

## Policy 10: CLIMATE CHANGE

### Australian Forest Growers:

- recognises the potential negative impacts of climate change on Australia's future forest and agricultural environments and their productivity;
- supports continued investigations into ways forestry can adapt to climate changes which are observed and predicted for particular (site-specific) regions of the country;
- participates in informed scientific debate on climate change, particularly in relation to environmental and productivity effects and the use of forest sinks to reduce the net impacts of climate change; and
- advocates that all debate on climate change be underpinned by sound, transparent and repeatable science.

### Preferred Outcomes

- A whole-of-government approach to enhancing the capacity of the Australian forestry sector, specifically to combat the predicted effects of climate change through carefully managed long-term capture and storage of atmospheric CO<sub>2</sub>.
- Assurance that an actively growing forest's capability to reduce society's net carbon emissions is considered equitably, both economically and environmentally when developing policy that impacts on the use of forests, especially existing native forests.

## Policy 17: CODE OF FOREST PRACTICE

### Australian Forest Growers seeks:

- Codes of Practice for forest management which are based on sound science and knowledge transfer and which enhance and support best practice;
- equity in Code of Practice requirements commensurate with companion rural industries;
- Codes of Practice which are effective, efficient and impose minimal additional compliance burden on forest managers; and
- that forest certification not be used as a surrogate for Code of Forest Practice compliance.

### Preferred Outcomes

- All Codes of Practice in respect of forestry are supportive of best practice forest management, are adaptable to change, and are designed not to be burdensome on forest managers.
- Review and/or development of Codes of Practice for forestry activities involve comprehensive stakeholder consultations.
- On-going Government provision of effective support and extension services to assist growers to comply with Codes of Forest Practice.

## Policy 23: PROPERTY RIGHTS

Australian Forest Growers seeks to ensure:

- that landowners have clearly articulated rights to manage and harvest forests on private property in areas where other types of primary production are permitted as of right; and
- that public policy recognizes the net benefit of well managed forests on private land and in so doing development legal frameworks and rating regimes that support land owners to maintain and enhance public goods within privately managed forests. These public goods may include biodiversity, threatened species management, heritage values or carbon sequestration.

Preferred Outcomes:

- Landowner entitlements to environmentally responsible management and harvesting of forests (native and planted) are supported and protected.
- Eliminate the requirements for development consents for environmentally responsible management and harvesting of forests (native and planted) on private land where similar constraints are not applied to other forms of primary production..
- Develop transparent, cost effective and robust market mechanisms to enable the trading of novel property rights associated with forest management including but not limited to forest rights, carbon rights, water rights and bio-diversity offsets.
- Support good forest management in native forests on public land with tangible public policy such as rate incentives where land owners can demonstrate clear net benefits from their management decisions such as silvicultural treatments.

## Policy 27: LAND USE PLANNING

Australian Forest Growers is aware of the important role forests have in achieving broad scale environmental, social and economic objectives, yet private plantations and native forests are often omitted from planning strategies that involve tree growing objectives.

AFG seeks that:

- planning instruments do not prejudice one form of tree planting over another; and planning regimes that apply to non-irrigated agricultural land uses also apply equally to plantation forests

Preferred Outcomes

- Local council requirements for tree cropping permits are removed, relaxed or aligned with the requirements for other non-irrigated agricultural enterprises. Forestry is a permitted 'as of right use' in appropriate land use zones across all land government planning schemes.
- Permit requirements for private native forestry do not exceed the requirements of any Code of Forest Practice.
- When formulating catchment management plans for a region, regulatory bodies such as Catchment Management Authorities and NRM agencies recognise and include more thorough consideration of the comprehensive values of private plantation and native forestry in the

rural landscape.