Senate Inquiry into the status, health and sustainability of the Australia's koala population

AFPA responses to Questions on Notice

Management strategies

Mr Stephens: I think it is important to acknowledge the landscape perspective here in terms of forest management. We are focusing on patch-level and harvest impacts—the potential removal of some future habitat trees or habitat trees. But the key here in the strategies is around minimising the risks of population decline in those areas. The adaptive management strategies are being put in place for that component of harvest are to minimise the risk at that regional level. I think it would be useful—we can provide information about the nature of those management strategies and their relevance at the landscape level.

Response:

The management framework and strategies applied to the sustainable management of native forests for wood production is comprehensive at a federal and state level and recognises the regional scale and significance of habitat requirements for long term koala population survival. It includes:

- the national forest policy framework – Australia's 1992 National Forest Policy Statement (NFPS) – which provides an overarching policy framework for the conservation and sustainable management of all forests;

- the Regional Forest Agreements (RFAs) – Commonwealth/State 20 year agreements underpinning regional approaches to conservation needs and sustainable production from native forests, primarily through:

    - the establishment of the comprehensive, adequate and representative (CAR) forest reserve system of formally protected areas (i.e. national parks) based on regional conservation planning criterion;

    - accreditation of state level ecologically sustainable forest management (ESFM) principles, regulatory codes of practice and ESFM plans in multiple-use forest areas where timber harvesting may be permitted. These codes and plans, include:

        - protected areas through additional flora and fauna reserves and forest zones as part of an adaptive management system in multiple-use forests - timber harvesting is excluded in these areas where there is an identified need (e.g. high quality habitat for endangered species);

        - requirements for pre-harvesting flora and fauna surveys and exclusion zones if evidence of koalas have been or are present in areas intended for harvest (note - requirements for NSW and Victoria are documented in the Central Queensland University Report 2011 'Threats to koala populations in south-eastern Australia and the

impacts of forestry activities on koalas and their habitat', a copy of which has been tabled for the Committee);

- the use of environmental management systems (EMS) by forest management agencies that are typically certified to international standards (ISO 14001) for the ongoing monitoring, reporting and implementation of best standards practice; and

- regulatory codes of practice for the retention of identified habitat elements (e.g. tree ferns) and habitat trees in forest patches (known as coupes) where timber harvesting actually takes place (in NSW for example, 20 hollow bearing trees are required to be retained per 20 hectare area of harvested forest).

In addition to these legislative and regulatory requirements, the forest industry has a high level of participation in voluntary sustainable forest management and chain of custody certification schemes that are internationally recognised. These schemes are designed to maintain a broad suite of socio-economic and environmental values through a credible process of planning, monitoring and third party (accredited certifier) auditing. The following excerpt from the Australian Bureau of Agricultural and Resource Economics and Sciences (2011) provides further detail:

> Several private organisations conduct forest and chain of custody certification in Australia. They use standards set by either the Australian Forest Certification Scheme (AFCS) or the Forest Stewardship Council (FSC) scheme. The AFCS uses the Australian Forestry Standard, which was developed through a nation-wide process involving representatives of the Australian community, industry and government. The FSC uses a standard that complies with its international 'Principles of Responsible Forest Management'. Both schemes issue chain-of-custody certificates that identify and track certified wood and wood products through the supply chain. The area of certified forest and plantation in Australia has grown to about 10.4 million hectares. This includes most of the native forests managed for timber production. About 80 per cent of Australia's certified forest area is native forest and about 85 per cent of Australia's certified forest area is publicly owned.
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> In addition to certification, multiple-use public forests and private forests are managed in accordance with codes of practice. Many forest managers use environmental management systems (EMS) that are certified independently to an ISO standard. Public forest management agencies with certified EMS in place include Forests NSW, Forestry SA, Queensland's Department of Environment and Resource Management (Forest Products), Western Australia's Forest Products Commission, Victoria's Department of Sustainability and Environment, and Forestry Tasmania. Several large private forestry enterprises also have EMS.
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> (ABARES 2011, *Australia's forests at a glance 2011: with data to 2009-10*, pp 36-37).

Consequently, sustainable forest land use and timber harvesting activities is supported by a broad regulatory and voluntary framework that is specific to the circumstances of each region. In New South Wales, for example, the following regulatory approach is taken with respect to species conservation:

> In New South Wales forestry operations are required to comply with three legislative acts: the *Protection of the Environment Operations Act 1997*, the *Threatened Species Conservation Act 1995*, and the *Fisheries Management Act 1994*. In response to these requirements the government licences' forestry activities through Integrated Forestry Operations Approvals (IFOA) which have been developed for four operational units of forestry management: the Upper North East Region, the Lower North East Region, Eden and the Southern Region (Figure 2). In all these agreements every species of conservation significance that does/or may occur in the region is outlined with specific management protocols for assessment and on ground responses to the species presence before and during forestry activities. A multi-catchment survey in NSW supports this localised, catchment approach to the management of koalas, showing that a broad (multi-catchment) approach is not sufficient (Crowther *et al.* 2009) and a more effective koala management approach should be developed at a catchment scale rather than at a broader region or state level.
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> (Central Queensland University 2011, *Threats to koala populations in south-eastern Australia and the impacts of forestry activities on koalas and their habitat*. Report to the National Association of Forest Industries, p 17).

Senator BOB BROWN: Do you have any—

CHAIR: Senator Cameron.

Senator BOB BROWN: I am happy to sit back on this issue.

CHAIR: I note that.

Senator BOB BROWN: Can you just assure the committee that there is no clear-fell logging in any koala habitat area in south-east Australia.

Mr Stephens: Most harvesting in Australia now, because of the codes and proscriptions, is probably better described as modified clear felling or one of a range of selective logging regimes. It is quite an emotive term that we hear quite a lot bandied about with the industry—

Senator BOB BROWN: Would you like to take that question on notice?

Mr Stephens: We can take that on notice.

Response:

Clear-felling has traditionally referred to the practice of removing almost all of the trees in a selected logging area and this method of harvesting has previously been used in the cooler, wetter eucalypt forests of Australia. However, given the increasing range of prescriptions and codes of practice for the retention of habitat trees and other forest elements in harvested coupes, many operations in these forest types are now described as modified clear-felling

practices. In addition, selective harvesting is the practice of removing only a selection of trees in a forest and is commonly used for harvesting timber from drier native forests.

Given the comprehensive management framework described above, it is unlikely that timber harvesting (either modified clear-felling or selective harvesting) is taking place in koala habitat of sufficient quality to be of concern to its long term survival and persistence. However, this is not to say that koalas do not occur from time to time in areas scheduled for harvest, given their ability to feed on a range of eucalypt species of varying quality and other environmental factors. It has been shown that while koalas focus on one or two fodder species, 18 species are considered primary fodder, with a further 70 different species of eucalypt and 30 species identified as part of a koalas' diet. Thus koalas can feed on a broad range of eucalypt species and forest types, and can vary in mobility and geographic home range (Central Queensland University Report 2011, p.5).

Furthermore, as described above, where there is evidence of the presence of koalas in areas nominated for harvest through pre-harvest koala surveys, there are requirements for the setting aside of additional minimum exclusion zones for their individual protection.

We would also refer the Committee to the submissions received by Forests NSW and the NSW Office of Environment and Heritage which address these requirements in further detail.

Changes to RFAs

Senator CAMERON: Mr Stephens, that is not what I am asking you. I am simply asking whether you do or do not have a record in a chronological order of the changes that have been made, and the analysis that has been done about what changes are required, to the forest agreement since 1999.

Mr Stephens: So you are talking about the broad forest agreements?

Senator CAMERON: Regional forest agreements.

Mr Stephens: I thought we were talking the individual codes of practice in the Eden forest area.

Senator CAMERON: No—the Eden Regional Forest Agreement.

Mr Stephens: The association supports the renewal of regional forest agreements and the review of those agreements going forward.

Senator CAMERON: That is not what I am asking you. Do you have the information or not? It is either yes or no.

CHAIR: I think Mr Hansard is about to indicate to you what he can provide.

Mr Hansard: We can provide the reviews of the RFAs for the Eden region.

Senator CAMERON: That is great.

Mr Hansard: Okay.

Response:

The Commonwealth and New South Wales governments signed the Eden Regional Forest Agreement on 26 August 1999. The RFA established a CAR reserve system covering about one third of the region and more than half of the region's public land. More than 255,000 hectares of the region is in dedicated reserves, with another 12 000 hectares in informal and other reserves.

An important element of each of the RFAs is the requirement for a five–yearly review of the performance of the RFAs. These reviews provide the basis for monitoring progress against high level obligations and milestones and progress in New South Wales has included a scoping agreement between the Commonwealth and New South Wales government on how to manage the review and an independent assessors' report, which can be found at:

http://www.daff.gov.au/rfa/publications/annual-reports/nsw

http://www.environment.nsw.gov.au/forestagreements/RFAreviews.htm

It is also important to acknowledge that the RFAs established a range of high level sustainable forest management principles and accredited a range of state level processes for achieving such principles. In this context, the NSW Forest Agreements and Integrated Forestry Operations Approvals processes are particularly important and cover the Eden region.

NSW Forest Agreements are in place for 20 years and are the result of consultation and consensus established between the NSW Government and major forest stakeholders. There are four NSW Forest Agreements covering eastern areas of NSW. These are:

- Upper North East Region - UNE (1999)
- Lower North East Region - LNE (1999)
- Eden regions (1999)
- Southern Region (2002).

In parts of NSW where Regional Forest Agreements are in place, timber harvesting operations are regulated by the terms of an Integrated Forestry Operations Approval (IFOA).

An IFOA is granted under the Forestry and *National Parks Estate Act 1998* and establishes strong, clear and consistent environmental regulation of native forest operations. The IFOA provides a set of rules encompassing the roles of the Department of Environment and Climate Change and the Department of Primary Industries in monitoring and regulating sustainable harvesting operations.

Further details regarding the IFOA process and amendments made to requirements for the Eden region can be found at:

http://www.environment.nsw.gov.au/forestagreements/agreementsIFOAs.htm

http://www.environment.nsw.gov.au/forestagreements/edenagreement.htm

Steps to deal with endangered species

Senator CAMERON: Can you provide me on notice details of what practical steps you have taken for endangered or threatened species in the forestry industry so I can get some idea of what you would be doing with koalas if it happened?

Mr Hansard: Yes, we can do that.

Response:

Please refer to the answers above, which outline the comprehensive regulatory framework and voluntary activities undertaken by companies and forest managers (i.e. primarily through independent certification and EMS under international standards) for sustainable forest management and species conservation.

Implications on the forest industry if koala's were listed

CHAIR: If the koala were to be a declared species under the environmental protection act and that then triggered the protections that are available under the act, what are the potential implications of those for your industry? I will go through them in turn. And what are the steps that your industry could take to address those outcomes? We have traversed this in general terms but I want to give you the opportunity to be more specific. If you want to take any of these on notice, because we only have about three minutes left, please do so. First, the development of conservation advice and recovery plans. What could be the implications of those in respect of koalas for your industry, and what steps might your industry take? If you want to take that on notice, that is fine.

Mr Hansard: Some of these might take a while to answer, that is all.

CHAIR: I appreciate that. I am basically these from the act. Secondly there is the potential that a register of critical habitat for the koala would be developed. Again, what would be the implications for your industry and what steps would you take? There could also be key threatening processes, which could well include some of your industry's activities. What would be the implications, potentially, for your industry and what steps could you take. Finally, threat abatement plans could be developed and could, again, have implications for your industry. So, again, what do you see as the implications and what could your industry do about those. My second area of questioning is far shorter. Mr Hansard, in one of your earlier attempts to answer—of which you had many—Senator Brown's questions, I think you indicated that it was recognised that logging can in some cases enhance koala's habitat. Can you expand on that?

Response:

The implications for the industry of the listing of the koala under the Act would depend on the type of listing, which would trigger the particular protections and obligations required at a Commonwealth level.

However, as discussed during the hearing, this would typically require the preparation of a species recovery plan and a risk assessment that would involve a review of existing threats and management strategies in place.

Given the range of planning requirements, management prescriptions and codes of place already in place for the regulation of commercial timber harvesting activities, this may involve only minor adjustments to existing management arrangements or more significant changes where there are identified gaps. However, an overall strength of the regulatory framework for species conservation in RFA regions and other commercially managed forests is the adaptive management systems and mechanisms already in place, which are able to take on new information and incorporate priority needs using existing mechanisms (such as the codes of forest practice).

The listing of the Tasmanian wedge-tailed eagle under the Act provides a relevant example where these requirements were accommodated through changes to existing forestry practices (i.e. requirements for improved surveillance and retention of at least 10 hectares of forest around each nest site, consistent with the Tasmanian Forest Practices Code).

However, as previously noted, timber harvesting is highly regulated and measures for koala protection will vary by forest type and state jurisdiction, taking into account habitat quality and landscape connectivity. There would be obvious cost implications of any revised changes for koala species protection which would be incurred by the forest manager or grower and typically passed on through the industry supply chain as higher costs.

In terms of the beneficial impacts of forestry activities on the viability of koala populations, these largely relate to the suite of land management activities undertaken as a part of forestry operations to maintain the overall health and ecological integrity of the forest estate, in addition to the specific regulatory requirements for biodiversity protection (identified above). These activities include, amongst other factors:

- active fire management (primarily fuel reduction) to reduce the threat of large scale high intensity fires that can be detrimental to both wood production and biodiversity;
- weed and pest management, such as the control of feral animals and predators such as wild dogs and pigs;
- provision of strategic infrastructure such as roading, fire towers and water points;
- maintenance of forestry and ecological management expertise from a vibrant forest industry and related personnel; and
- revenue from the commercial sale of wood products to support ongoing management and biodiversity protection measures in many publicly and privately managed forests.

Furthermore, the recent scientific review commissioned by the forest industry into the impacts of forestry activities on koalas provides some useful insight into these broader factors, particularly at a whole of landscape scale:

> With the long term sustainability of forest industries being dependent on the maintenance of multiple-use timber production forests, koalas have the opportunity to simultaneously utilise and take advantage of these habitats. Some of the now forested areas in Victoria which are important Koala habitat were planted for timber production (between 1930 and 1950) after being completely cleared for farming or broadacre logging. In NSW the regulated timber industry ceased land clearing on vast estates after extensive areas were completely cleared for agriculture and livestock. In many of these areas koalas may have become locally extinct without the habitat provided by the industry.

The nature of the forestry industry being business based, also allows for the upkeep and maintenance of the lands, through the control of weed and animal pests, maintaining fire breaks and managing traffic. This active management is not always possible in National Parks and Reserves and can be difficult on private and leasehold lands. Forestry management maintains the forest integrity and structure as well as pests. For example, the management of feral pests (particularly dogs) has a direct carry on effect for koala populations.

(Central Queensland University 2011, *Threats to koala populations in south-eastern Australia and the impacts of forestry activities on koalas and their habitat*. Report to the National Association of Forest Industries, pp 26-28).