
Briefing Paper:

Impact of FPPF tenure and management change on FSC

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Background

Forestry Tasmania (FT) is currently undertaking its second attempt to achieve Forest Stewardship Council (FSC) certification for the logging operations on the land it manages, the Permanent Timber Production Zone land (PTPZ).

Government, FT, Industry and other stakeholders support FSC and acknowledge it is critically important for FT to achieve FSC to access and maintain markets, demonstrate sustainability of logging operations and eventually become commercially viable.

A first step in the third party audit process, a High Conservation Values (HCV) Assessment and Management Plan, is produced by FT and published for stakeholder comment. FT released its 2017 HCV Assessment and Management Plan on Friday 10 February ([here](#)). This assessment and plan seeks to address issues identified as non-conformities in its earlier assessment (2014).

Parallel with FT's FSC bid, Government proposes to reverse the protection covering 357,000 ha of informal reserves identified as of high conservation value, protected through the Tasmanian Forest Agreement (TFA) and subsequently placed in a Future Potential Production Forest (FPPF) tenure on repeal of the TFA.

These forests remain protected from logging and, according to Government and FT, form part of the Tasmanian Reserve Estate ([official table here](#)). They are managed by the Parks and Wildlife Service and include areas in the takayna/Tarkine, Blue Tier, Derby, Bruny Island and Wielangta, amongst others.

FT's HCV analysis also considers the FPPF land as part of the Tasmanian Reserve Estate and explicitly treats the values in those forests as protected, because they are in a reserve. The FT report acknowledges that should changes to the management of FPPF occur, the HCV

Assessment and Management plan would need to be 'reviewed and revised'.

FT's HCV Assessment and Management Plan

A HCV assessment looks at the important conservation values located on the management area for which FT is applying for FSC certification (the PTPZ land), and the Management Plan articulates how those values will be 'maintained and/or enhanced' as per the requirements of FSC.

There are six relevant FSC HCV criteria (see pg. 4-6 of the FT HCV assessment), including values such as concentrations of biodiversity, threatened ecosystems, basic services of nature and cultural identity.

Some HCVs require assessment at the 'landscape level'. Because these values exist across different tenures and not only on FT's PTPZ land, consideration of the values in land outside the PTPZ is made. If those values exist within the Tasmanian Reserve Estate (including the FPPF land), they are assumed to be permanently protected and that affects the data inputs, HCV analysis and resulting management prescription proposed by FT.

FT's HCV Assessment and Management Plan explains this by stating:

The assessment also considers the presence of HCVs in the broader state wide landscape where appropriate (e.g. landscape level forests and forest community ecosystem reservation status). State wide assessments included identifying the existence and extent of HCVs within existing formal and informal reserves (e.g. National Parks, Conservation Areas, Regional Reserves and the Future Potential Production Forest land). This approach is consistent with recognised best practice for HCV assessments (Neugarten and Savy 2012) and is appropriate in the Tasmanian context given the significant reserve system that has arisen from previous conservation value assessments and subsequent land use decisions (pg 8).

Government legislation

The Tasmanian Government proposes to introduce legislation in 2017 that will change the tenure of FPPF land to 'production forests', change its land manager to an entity other than the Parks and Wildlife Service and allow for logging.

While detail is scant (see a Ministerial Statement [here](#)), in an effective admission that logging the FPPF land would create FSC compliance problems for FT if it were the land manager, Government has declared that the FPPF land will not be returned to FT management and will be logged by the private sector. This is a separate issue to the invalidation of the HCV Assessment and Management Plan by changes to the FPPF land.

Changing the tenure of the FPPF to one that allows logging will see the land removed from the Tasmanian Reserve Estate and HCVs no longer guaranteed protection. Consequently FT's HCV Assessment and its assumptions will be rendered wrong. Increased protection requirements in the PTPZ land will be required to compensate for the removal of protection for HCV areas in FPPF. This will change the nature of management actions required to protect HCVs on the PTPZ land, hence invalidating the Management Plan component of the FT document.

While FPPF tenure is maintained, it is counted for the purposes of the FT HCV analysis as reserve, considered equivalent in the level of protection afforded conservation values as a National Parks and even World Heritage. When that tenure changes it is no longer protected, changing the underlying assumptions and data inputs of FT's of landscape-scale assessments.

The FT HCV assessment recognises that any change to the protection afforded conservation values outside of the PTPZ renders the HCV Assessment and its conclusions invalid. The report states:

If any significant change was to occur in the management of land outside of the PTPZ land, the relevant elements of this plan will be reviewed and revised as necessary. (pg 8)

Passage of legislation that unwinds protection afforded FPPF land will set FT back to square one, causing it to review and revise this HCV Assessment and rewrite its Management Plan before being able to restart the FSC assessment process. This directly conflicts with the Government's commitment in Minister Barnett's Ministerial Statement of the 29th September that the Government's plan to log FPPF land would not 'impede' FSC for FT.

To best reinforce FT's Feb 2017 FSC HCV Assessment and Management Plan and maximise confidence through its FSC audit, FPPF land should be formally gazetted as conservation reserves under Tasmania's *Nature Conservation Act 2002*.