



AUSTRALIAN FOREST GROWERS

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TASMANIAN BRANCH

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16 January 2013

Mr S. Wright
Committee Secretary,
Tasmanian Forests Agreement Bill 2012 Committee,
Legislative Council,
Parliament House,
Hobart TAS 7000

By Email:

Dear Mr Wright,

RE: Australian Forest Growers submission on the Tasmanian Forests Agreement Bill 2012

The Tasmanian Branch of Australian Forest Growers provided a submission individually to each of the Members of the Legislative Council dated 7 December, 2012. A presentation was made to the Council on 11 December 2012.

This submission has been revised to address in more detail some of the matters raised by Members at that meeting.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'F. O'Connor'.

F. O'Connor
President - Tasmanian Branch

Submission to the Legislative Council committee reviewing the Tasmanian Forests Agreement Bill 2012

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Amendments proposed to the Bill:

1. The proposed reservations are not based on any nationally or internationally recognised definition of High Conservation Value Forest (HCVF). There should not be any reservation until a proper agreed, verifiable definition of HCVF is determined and scientific studies done based on a sound basis.
2. There should be local level consultation so the wider community is aware of the proposed reservations now that mapping has finally appeared Durability arrangements need a full review and a binding commitment to remove favourable treatment of environmental groups under particularly Australian Government legislation.
3. If the legislation is enacted then the number of reserve tranches and the time period over which areas are added to the reserve system should be increased.
4. Changes to the Forest Practices Act and Code need to be finalised and economic and social impact criteria included in Forests Practices Authority decision making and Forest Practices Plan assessment.
5. Certification arrangements need to be better defined.
6. The Legislative Council should determine whether a Regulatory Impact Statement is required.
7. There needs to be a complete socio-economic study of the potential impacts of the TFA on all aspects of the Tasmanian community. There should be proper peer review of any study in contrast to the draft IVG reports prepared as part of the TFA process.
8. There should be a proper process for justification of every one of the 300 forestry zones included in the first tranche that is to be proposed to be added to the reserve system, not just a 150 page list as provided this week.
9. The Bill should mirror all points in the TFA, not just those that favour environmental outcomes.
10. In any restructure of Forestry Tasmania full management and control of production forest land needs to be retained by the entity responsible for planning and supervision of harvesting.
11. TFA impacts on Private Forest Owners who have Private Timber Reserves should be monitored and be compensated, if material, after the first 5-10 years of a TFA and its legislation.
12. The Forest Practices Act needs to explicitly consider social and economic outcomes and fair compensation where reservation of private forests exceeds duty of care, to provide community benefit.
13. The Forest Practices Code review needs to be completed before any more reservation as recommended by the Legislative Council's own committee.
14. The Forest Practices Code should note the registration of land as a Private Timber Reserve for long term wood production and allow a simplified Forest Practices Plan process.
15. There needs to be assistance to private forest owners to gain forest certification and certification conditions should only apply to the defined forest area and not to other rural land management.
16. The Australian Forestry Standard and FSC should be benchmarked to allow dual certification and the use and promotion of AFS not discriminated against.

17. FSC must agree that some forest types ecologically require clear-felling to ensure adequate regeneration outcomes as do other forest types in other parts of the world.
18. International benchmarking of Tasmanian forest practices with those in place in the forests of domestic and overseas customers of Tasmanian processors should be given priority.
19. AFG considers that if there are reservation tranches, then these should be increased in number. This would allow more and proper verification studies. The time over which reservation of the tranches should be extended to a period exceeding at least 10 years.
20. Non negotiable from AFG's point of view is the removal of favourable treatment of environmental advocate's statements and actions under both State and Federal legislation.
21. AFG recommends that the Legislative Council re-examine the Forest and Forest Industry growth strategy. The industry as with other major sectors in the Tasmanian economy is subject to cycles due to external influences beyond its control. There should be forward planning for international economic and building industry improvements.
22. The status of any reservation should be closely reviewed so as not to restrict access to the land by most Tasmanians for the full range of traditional uses.
23. There needs to be a clearer commitment to future funding of any expanded reserve system. A full breakdown of how the proposed \$9 million will cover the costs of an expanded reserve system with 300+ zones in the initial tranche should be provided. There should be an explanation of how fuel loads will be managed in any additional reserves.
24. AFG considers regulations for fuel reduction on private land need urgent review with priority with protection of lives, property including commercial forests and livestock being paramount.
25. The Triabunna woodchip mill needs to be re-opened with a commercial operator without environmental movement imposed conditions.
26. The ability to use residue from private native forest for bio-energy should be defined in legislation as specified in section 31 of the TFA.
27. Private forest owners need to be proportionately represented in any Special Council set up under legislation to assist with sections 22-27 of the TFA.
28. Any demonstrable long term benefits of adding another 500,000 hectares to the existing reserve system should be clearly outlined to the Tasmanian community.

Introduction:

Australian Forest Growers (AFG) is the national association representing around 1200 private forest growers from 24 regional branches across Australia's forest growing regions. AFG's members include farm plantation growers, private native forest managers and private commercial plantation companies predominantly focussed on timber products.

Founded in 1969, AFG has for over forty years, advocated responsible establishment and management of forests on private land providing the multiple outcomes that the community increasingly demands. AFG has been active in Tasmania since at least its first national conference in Tasmania in 1979.

The growing of commercial plantations and sustainable active management of private native forests by our members has been delivering improved landscape health outcomes for decades, as well as complementing existing productive land use practices.

AFG attempted to become involved in the process that led to the Tasmanian Forests Agreement, on which this Bill is purported to be based. AFG wanted to assist to represent the interests of private forest owners in Tasmania. AFG made a submission to Bill Kelty, in his role as "Independent Facilitator" in March 2011. There was no feedback on this submission.

It is our opinion that there has been a totally unacceptable lack of consultation with most parties who will be affected by this Bill in the process leading up to its consideration in the Tasmanian Parliament.

In addition AFG made a submission to the Legislative Council's Inquiry into Public Native Forests Transition in April 2011.

AFG has a number of critical concerns with the process, agreement and proposed legislation. These concerns are particularly about the consequences for private forest owners, the forest industry as a whole in Tasmania and the Tasmanian community. There have already been both direct and indirect impacts of the IGA process to date and these will be worse, if provisions of the Bill, that you are now considering are implemented.

The Major Issues for Private Forest Owners:

- **To make AFG's position totally clear, AFG does not believe that the Bill and the Tasmanian Forests Agreement are in the best interests of all Tasmanians.**
- **The acceptance of the TFA shrinks one of the States cornerstone industries for no demonstrable benefit. The Bill and the TFA further reduce the potential scale of the forest industry after 30 years of additions to the reserve system.**
- **The Bill also rewards unethical and potentially illegal behaviour by a minority that responsible Governments would counter and legislate against.**

- **AFG emphasises that the proposed reserve outcome has no scientific basis and that there still remains no definition of High Conservation Value Forest other than that the additional 500,000 plus hectares includes land that is part of the ENGO's wish list.**
- Consultation with all affected stakeholders and the wider community has been inadequate, insufficient and un-representative
- Durability arrangements are less than effective, they are ambiguous and non-transparent.
- There is NO surety that 'arms length' ENGO's will stop damaging the Tasmanian brand.
- New cost imposts on private forest owners by Forest Practices Authority will result
- FSC certification alone is not a 'be all and end all' and previous private forest engagement with FSC certification has included attempts by certifiers to influence agricultural issues outside the defined forest area..
- Proposed reservation is not based on sound, scientific and peer reviewed environmental, social and economic impact studies. It is commonsense that these assessments be done prior to any legislation being enacted or why do them as an after-thought?
- Proposed reserves cannot be adequately funded or managed, thus increasing the risk of catastrophic wild fires and long term degradation of ecological processes.
- Locking up reserves for conservation is an outdated approach in a contemporary world.
- Science shows harvested and regenerated forests are more effective carbon stores than unmanaged forests.

Tasmania needs Economic Diversity:

The Tourism industry:

The main replacement for the forest industry as a wealth generator for Tasmania proposed by the environment movement for the last 30 years has been tourism.

Data on the tourism industry is available from a range of web-sites but the Australian Government now publishes a State of the Industry paper each year - http://www.ret.gov.au/tourism/Documents/tra/Economic%20Analysis/State_of_the_Industry_2012.pdf

Tourism has been affected by the strength of the Australian dollar, which has made it more attractive for Australians to travel overseas with 8 million departures compared with 6 million incoming visitors in 2011-12. The high AUD plus more low cost airline capacity has made Australia less internationally and domestically competitive. Tasmania receives a relatively low percentage of international visitors at about 2.5% by number and 1.5% by visitor nights. (State of the Industry 2012 pg 25).

However, most of the Australian tourism industry is dependent on domestic travel. The trend for interstate visitor numbers to Tasmania at 784,500 for the year to September 2009 compared with 751,000 to September 2012 is not encouraging with a reduction in visitor nights as well. In terms of visitor nights Tasmania represents just 3% of the total Australian domestic travel industry.

Some developments have occurred on the East Coast, the West Coast, and the Central Highlands, to make use of the wilderness experience. However other proposed developments such as Pumphouse Point, the 3 Capes Walk, Crescent Bay and Cockle Creek have been aborted or had a difficult history, when they should have had genuine support if Tasmanians were realistic about the need to generate wealth from the wilderness experience. Declining visitor numbers to National Parks also provide evidence that a tourism substitution for the forest industry is not a viable strategy on its own.

In conclusion to rely on tourism to make up for the deficit in the Tasmanian economy caused by the destruction of the forest industry is flawed unless there is major changes to the marketing and infrastructure for tourism to Tasmania.

The economic Importance of Private Forestry:

In 2008 a report entitled "Measuring the Economic Value of Private Forests to the Tasmanian Economy" was prepared for Private Forest Tasmania by Dr Bruce Felmingham and Mr Alexis Wadsley MBA. This is available on the PFT web-site (<http://www.privateforests.tas.gov.au/publications/occasional/papers>)

The economic impacts were projected from two input/ output models with very similar model outputs. Therefore the report considers the following can be argued:

- *The private forestry sector contributes \$450 to \$650 million to Tasmanian Gross State Product (GSP).*
- *The private forestry sector contributes \$225 to \$290 million annually to wages income.*

As at 2007-08 the report stated that *"the private forestry sector was responsible for the creation of 5,171 to 5,400 full time equivalent jobs directly and indirectly to all Tasmanian industries.*

The direct proportion of Tasmanian GSP attributable to Tasmanian private forests was 0.4%. Tasmanian private forestry contributes 3.2% of Tasmanian GSP when the related components of GSP are included. The GSP contribution of private plantation investment is

approximately 0.4% of Tasmanian GSP, Tasmanian private forestry dependent manufacturing 0.6% of GSP and multiplier effects associated with dependent manufacturing contribute 1.9% of GSP. Public forestry contributes 0.5% of GSP directly and 0.9% through public forestry dependent manufacturing.

By comparison with other sectors, mining directly contributes 2.6% of GSP and accommodation, cafes and restaurants directly contributes 2.2%.

Revealed preference analysis indicated that the present value of potential timber revenues foregone through non-harvesting decisions by land-owners or the Forest Practices Codes is \$439 million. This is the implied environmental value currently protected by non-harvesting. Based on benchmark environmental values, the present value of services through biodiversity, salinity, riparian protection and aesthetic values is \$1.035 billion across the plantation and native forest estate. This value excludes carbon value. Over 50% of this environment value is associated with native private forests subject to partial harvesting regimes. The present value of timber from native forest subject to harvesting in native forests or plantations is estimated at \$2.1 billion.”

At 1,057,276 Hectares, private forests make up 31% of Tasmania’s total forest area. This is 27% of the State’s Native Forest and 64% or 199,402 Ha of the State’s plantation forest based on information from the PFT Annual report 2011-12.

There has been a substantial fall in the harvest of both private native forest and plantation hardwood. The change in native forest harvest volumes can largely be explained by the voluntary exit of Gunns from native forest harvesting. It should be noted that the ratio of NF sawlog recovery to NF pulpwood has doubled. This cannot be explained entirely by improved segregation and would suggest sawlog only harvest and potentially a waste of considerable pulpwood volume.

There has been a significant fall in private plantation hardwood harvest from 1.1 million tonnes pre GFC in 2007-08 to just 252,000 tonnes in 2011-12 or 23% of former volumes. This is at a stage in the plantation program when the plantation hardwood harvest should have been continuing to expand. This can be partially explained by the GFC impact and market factors, but the recovery and increased volumes exported from other States indicates substitution of Tasmanian volumes for exports out of particularly Portland in Victoria.

For example the volume of broadleaved (hardwood) woodchips exported from Tasmania reduced from 1.459 million tonnes in 2010-11 to 361,052 tonnes in 2011-12 or just 25% of the previous year’s volume and a loss in value of \$172 million. Over the same period the Victorian export volume increased from 603,000 tonnes to 1.08 million tonnes or an increase of 180%.

Overall unit price of export hardwood woodchips increased marginally over this period (0.7%). (ABARE Forst and Forest Products Statistics).

It should be noted that from 2010-11 to 2011-12 the mainly native forest woodchip export from NSW declined to 84% of the previous year's volume and did not see the dramatic drop registered by the Tasmanian sector.

The essential point is that while the harvest from Tasmania's forests, both plantations and native forests is at a long term low, the trees are still standing, mostly growing, potentially increasing in value and could be marketed, given positive and correct Government support instead of capitulation to ENGO extortion. This is one of the advantages of wood production compared with other crops.

A corporate decision, without regard to its impact on the Tasmanian economy, to export mainland instead of Tasmanian wood volumes is not a reason to shrink the total forest industry permanently.

Consultation:

There has been little consultation with the Tasmanian private forestry sector or the community outside the membership of the select groups who have been negotiating mainly in secret for more than two years.

We also note that there has been no Regulatory Impact Statement prepared nor proposed.

The Subordinate Legislation Act 1992 specifies that, if any new or amended subordinate legislation is assessed as imposing a significant burden, cost or disadvantage on a sector of the public, it should not be introduced unless it can be justified as being in the public interest. If a significant burden, cost or disadvantage would be imposed, the Act requires that agencies and authorities prepare a regulatory impact statement (RIS) and use it as a basis for public consultation.

A RIS must:

- explain the objectives behind proposed subordinate legislation;
- detail the alternative options that could achieve those objectives;
- estimate the costs and benefits which could be expected to flow from these options;
- indicate which is the preferred option and why; and
- outline the public consultation process to be undertaken.

The legislation and its timetable were being driven by political considerations prior to the end of 2012. It appeared that the legislation was being rushed to lock in binding outcomes before elections at two levels of government. There has been no mandate from the Tasmanian community for an unelected and unaccountable, self nominated collective to decide the fate of 8% of Tasmania and about half of the forestry industry in this manner.

It is an extremely poor precedent for setting public policy.

It is noted that in the Bill Section 9 of Schedule 1 refers to "meaningful engagement and involvement of forest stakeholders". This is only occurring as a consequence of the opportunity to make submissions to this committee. The manner in which this Bill was rushed through the Lower House to allow consideration by the Legislative Council is

unacceptable. Nevertheless, AFG appreciates the opportunity to at least have some considered input.

The concern by others about the delay caused by having this committee consider submissions about this Bill has not resulted in the sky falling in and AFG considers that it was improper to use Federal Government coffers in such a blatantly conditional manner to attempt to distract Legislative Councillors from engaging in proper debate and consultation on the impacts of this Bill.

AFG believes it is bizarre to use taxpayer monies to pay people not to work and to reduce the limited wealth generation opportunities that we have in Tasmania. This is particularly the case where the reduction in wood production in Tasmania will only be replaced by wood produced under far less stringent forest practices than those in place in Tasmania.

It should be obvious that Tasmania needs more employment diversity to overcome its inherent population and transport difficulties compared with other States. As stated in the Legislative Council's own report on "Transition out of Public Native Forest" under Findings section 140 (b) "**a viable forest industry remains economically critical for Tasmania and in particular for regional communities**". AFG considers that a substantial contraction of the size of the total forest industry is unlikely to ensure an economically viable industry and the opposite is more likely the case as economies of scale are increasingly essential.

It is not a good precedent for consultation that amendments have just been submitted to the Legislative Council for the Bill by the Government without even referring these to signatories of the TFA. One has to wonder, who is really driving this agenda and do they consider that all stakeholders should have an opportunity to review these changes?

These last minute amendments appear to be aimed to present the Protection Order as a fait accompli without the benefit of a durability report. The maps of the land being considered as part of additions to the reserve system should have been provided a very long time ago. There should be a properly considered justification for the inclusion of every one of the 300 forestry zones into the reserve system.

Durability:

AFG believes that the current Bill is not consistent with the Tasmanian Forestry Agreement (TFA) in terms of providing durability. Without the inclusion in the Bill of the critical points below, then the TFA is not being complied with and from a durability point of view the proposed legislation is commencing from well behind the final negotiated position. This is probably not assisted by the Bill having been drafted several months before the final form of the TFA was agreed to by the signatories.

Forestry Tasmania:

There is no reference in the Bill to the restructure of Forestry Tasmania. This is probably a deliberate omission. However, experience in other States has shown that the management of production forests and the lands on which they are growing should be by "a statutory commercial body, with an independent Board with fiduciary duties, **maintaining full**

management and control of such lands” as stated in Section 55 of the TFA. It is essential that the form of control of the production forests is outlined in the Bill and does not become a point of contention or is used as a political lever at a later stage.

Without this structure being specifically provided for, then there is far less surety of wood supply (sovereign risk) to industry and more uncertainty. AFG emphasises that the management and marketing of wood from these forests must be commercially driven. State Forest sales should not be allowed to impact on the commercial returns from wood sold from private forests through decisions being made for reasons other than maximising returns from the wood resource that it manages on behalf of Tasmanians.

In the TFA, the structural point was addressed in Attachment A to the TFA (paragraph 2 of the Industry Vision). In turn, this paragraph has been added as Schedule 1 to the Bill. The position of Forestry Tasmania as a statutory incorporated body managing both the lands and the forests used for production forestry needs to be reinforced and be part of the legislation.

Forest Practices Act:

In addition the TFA provided for amendments to the Forest Practices Act (Section 53) to provide for recognition of Attachment A of the TFA and to require the Forest Practices Authority to specifically consider not just environmental outcomes but also social and economic outcomes. This is important to private forest owners as while it is reasonable to have a defined and limited “duty of care”, it is unreasonable for excessive environmental costs or reservation to be borne on private land. The Forest Practices Act needs to explicitly consider social and economic outcomes.

We note that the Legislative Council’s own committee on the “Transition out of Public Native Forest”, recommended that there be no more reserves or transition out of public native forest without consideration of - “the Tasmanian Government complete the review of the Forest Practices Code” (S141(i)). This was also agreed and listed as point 54 in the TFA.

This is an essential consideration for private forest owners, who have already carried significant economic losses due to changes such as the Permanent Forest Estate restrictions on land conversion as part of previous “forestry agreements” such as the Tasmanian Community Forestry Agreement in 2004. Again these changes were made without consultation with the private sector as a result of political and bureaucratic expediency. The opportunity cost for private landowners of this unilateral change has never been properly recognised but was quantified in an NRM report and is in the hundreds of millions of dollars.

Private forest owners have absorbed high planning costs through a complicated Forest Practices system and substantial opportunity costs due to political land use changes such as through the Tasmanian Community Forest agreement in 2004, with no consultation. Therefore AFG proposes that those private forests, which have been registered for long term timber production through the Private Timber Reserve system should be able to produce Forest Practices Plans on a simplified basis after their first FPP or the new registration of an area as a PTR is approved. This would remove considerable overheads from private forestry operations. FPP’s would still be submitted but without the need for a

complete and repeated review at each harvesting cycle. This would align with practices in some other States.

The notification process and developments with databases should allow any significant changes in the intervening period to be assessed by the Forest Practices Authority rather than being an additional cost borne by the private forest owner.

Certification:

The TFA refers to support for FSC certification under points 46 – 48. For certification purposes, it is critical for Forestry Tasmania to be recognised as the forest manager on public land.

A push for certification by FSC will impact **both public and private land**. Therefore there also needs to be provisions to assist forest managers on both public and private land to be recognised and defined as sustainable managers of production forests. This can be assured by recognising compliance with the Tasmanian Forest Practices Code as meeting the criteria for this certification. These requirements can only be assured if agreed prior to legislation being enacted.

There is concern by forest managers who have been involved in FSC certification processes about FSC governance and the degree of influence of environmental organisations of the criteria, which FSC certifiers must apply. In examples in Tasmania this has extended to other land management issues related to farm management and obligations to influence neighbours to also adopt FSC certification.

The scope of any FSC certification needs to be strictly limited to only the forest areas being certified. There should be no mandatory certification or bias towards one certification body over another. The use of the Australian Forestry Standard (AFS) should not be excluded and its link to the much larger international PEFC certification. There is a case for benchmarking the two certification systems and seeking dual certification.

There is a current example of an ENGO campaigning against Australian made Reflex Paper due to its native forest content. ENGO web-sites are actively campaigning for substitution of Australian manufactured copy paper for imported papers from as far away as the UK. It should be noted that an important element of the dispute between Australian Paper and the ENGO's is a definition of High Conservation Value Forest. It suits the ENGO's to not have a meaningful definition for this term and this has the potential to be used inappropriately in any certification process.

The misinformation generated by ENGO's is a form of extortion. The misinformation is often in the form of gross simplification of complicated matters by using meaningless generalisations. The issue of so-called High Conservation Value Forest is one of these.

It is also critical for an acknowledgement from FSC that the management of some Tasmanian forests does require clear-felling to achieve proper effective reforestation, as do

many forests in other places around the world. Where convenient to ENGO arguments FSC does recognise this.

The certification issue could be achieved by having an appropriate benchmarking provision. It should be noted that the Tasmanian Forest Practices system has been independently assessed as being in the top three such systems in the world. Yale University studies found Tasmanian forest practice policies for public lands are among the five most consistently prescriptive of the case study public ownerships and among the three most consistently prescriptive of the case study private ownerships. Tasmanian performance thresholds are most comparable to those of western North America.

<http://www.yale.edu/forestcertification/pdfs/Tasmania%20Report%20Final%20rev%20Feb%2008.pdf>)

As an added assurance it would be useful to fund an independent study that compares Tasmanian forest practices with those of the main customers of Tasmanian forest products at both a domestic and an international level. AFG believes that a properly benchmarked study would confirm the very high quality of forest practices in Tasmania, compared with other jurisdictions. This could assist to counter some of the incorrect statements about forest practices in Tasmania.

ENGO compliance:

The essential durability matter is the behaviour of the signatory ENGO's and their offshoots. Already we have seen doubts and caveats stated by senior activists associated with Markets for Change. Other splinter groups have also expressed doubts about the TFA. As not-for-profit organisations the ENGO's have little public accountability for how the funds donated to the major ENGO's are used. Therefore there is no way of knowing if these splinter groups are being funded either directly or indirectly by the major ENGO's to remain as an ongoing strike force, on-call for environmental activism as required.

On past performance it would be naive to expect that an enduring peace in the forests will come from the TFA as there is no lasting mechanism to bind the vast number of splinter groups to an outcome. This is particularly the case once all the area designated in the existing process is in reserves as early as 2015 ie only about 2 years away or less time than it has taken to negotiate the TFA to this point.

One can expect that the ENGO's goal posts will be moved again. The environmental bureaucracy cannot afford not to have forest conflict as this is their main funding means. Also the stated aim of at least two of the ENGO signatories for many years has been to end all native forest harvesting. Activism is their business and their business model and funding is dependent upon protest action.

As a State Government Minister, Nick McKim has stated that he agrees with the Bill and supported it through the Lower House but he doesn't agree with the provisions of the TFA and the Bill appears to reflect this. **This leaves this Minister in a position to oppose those provisions of the TFA that he doesn't agree with and which have conveniently been**

omitted from the Bill. Therefore the Bill requires further significant amendments to mirror the TFA.

There is no doubt that the TFA was arrived at under industry duress. The proposed legislation effectively rewards the ENGO's for their blackmail and bullying of industry stakeholders from customers to shareholders to banks. The targeting of individuals, firms and organisations that do not agree with protest movements is a form of mob rule and needs to be resisted. Without the back-bone to derive public policy through civilised means then the type of protest action the forest industry has been exposed to will escalate in other sectors causing more economic paralysis in Tasmania.

There is not a level playing field as Federal Trade Practices, Fair Trading and secondary boycott provisions, which could be used to limit the more outlandish claims of ENGO's, specifically exclude environmental organisations in some of their legislation. As "charities", donations made to the ENGO's are tax deductible but the relatively limited industry expenditure comes directly off the bottom line of companies and industry participants to counter ENGO claims and actions.

There is a view that it is potentially within Federal Minister's powers to counteract some of the environmental activism in international markets. However, under the current government this seems unlikely to happen.

Some of the tactics targeting companies are not dissimilar to the false news release about bank funding of Whitehaven Coal, which is now the subject of an ASIC investigation. It is illuminating to see that some of the parliamentary wing of the environment movement think that this deception is justifiable at considerable financial cost to some Whitehaven Coal investors. The shareholders of Tasmanian companies and many small private Tasmanian enterprises have been treated in a similar manner by misleading campaigns in the markets of these businesses. The TFA rewards these tactics. This is ethically wrong and will lead to the same tactics being used against other natural resource industries.

To quote from "The Australian", Opinon "Greens are losing voters as their agenda is exposed" 16 January 2013 –*"So let us thank Milne for her honest outburst. Her statement last week that Moylan's fraud was "part of a long and proud history of civil disobedience, potentially breaking the law, to highlight something wrong" revealed utter contempt for those mainstream voters who would never condone Moylan's law-breaking vandalism and it revealed contempt for those small shareholders who lost money as a result of the eco-lout's fraudulent scam. It also exposed the Greens' broader contempt for our system of democracy."*

There should be no new legislation enacted until the favourable legislative treatment of environmental statements and actions is removed at both State and Federal Government levels. This should be a non-negotiable element of any durability package.

In addition, environmental protests in the forests have potentially made work places unsafe and distressing for many honest working Tasmanians, and these activities have often not been fully controlled. This could be corrected by making workplace invasion a more

significant crime and less tolerated by agencies such as Workplace Safety and others involved in OH&S. AFG understands there is current proposed legislation to harmonise workplace safety legislation across Australia and provisions regarding workplace invasion are included.

Also there is obviously considerable risk to personnel and waste of the resources of emergency services and other people involved in Government agencies.

As suggested above some of the same ENGO's involved as signatories in the TFA are threatening jobs in other sectors.

Given the ENGO's achievements in the forestry sector, their campaigns in the so-called Tarkine against mining, the fishing industry and marine parks, aquaculture, irrigation development, eco-tourism plantation forestry and other natural resource based industry will likely follow similar trends.

How are Tasmania's politicians going to respond to these campaigns?

Or are our politicians going to allow the same tactics to be rewarded again to the detriment of Tasmanians who want to remain in Tasmania with a livelihood for themselves and opportunities for their families?

Reservation:

How much reserve?

As stated above the proposed legislation vindicates and rewards the appalling tactics of the ENGO's to date. Where will this lead in setting future public policy on a whole range of issues and how will we as a State ever achieve rational, engaged consultation after the gains this process provides to minority views? **Prior to the last election both Labor and Liberal candidates supported a Forests and Forest Industry Council growth strategy for the Tasmanian forest industry.**

The negotiations on the TFA, the passing of legislation through the House of Representatives and the Australian Government involvement has not been a democratic process and it reeks of political opportunism. To give into this through a policy of appeasement is a "peace for our time" outcome and should be an embarrassment to all involved.

As above, AFG considers that if there is any additional reservation, then the initial tranche should be a much smaller area than the 395,000 Ha tranche 1 proposed in Section 35 of the TFA. If some area really has World Heritage status after proper and thorough independent analysis, including a full economic and social assessment, then this could be considered for tranche 1 subject to a durability report that confirms compliance with the spirit of the TFA by all ENGO's and not just the ENGO signatories.

AFG suggests that further reservation, if necessary at all, should only occur if properly scientifically based. Reservation tranches should be over a much extended period to ensure durability provision compliance. Any reservation should be in a number of smaller tranches

rather than just the two proposed with an implementation by 2015. Reservation should be based on scientific assessment and economic and social impact criteria, instead of the simplistic drawing of lines on maps behind closed doors. We note that mapping has only this week been made available to the Legislative Council at large scale and after a previous expectation that legislation would be passed without these being available..

How reserved:

The TFA calls for the highest appropriate land tenure protection under State and Commonwealth law for the new reserves (section 36). In contrast, AFG believes that the options for future generations should not be restricted by a change in land tenure under the TFA, particularly considering the manner in which it has evolved.

AFG is firmly opposed to any land tenure change that unduly restricts access to the land by most Tasmanians for a range of purposes. This includes productive, wealth creation purposes such as mining and recreational uses under appropriate guidelines. Given the declining visitation into Tasmanian National Parks the extension of the area of Tasmania that is within National Parks will add to the alienation of many Tasmanians from the forests under consideration.

Using Parks and Wildlife's own figures and based on their reference sites, visitor numbers peaked in 2004-05 at 763,000. By 2011-12, visitor numbers had progressively declined to 661,000 (which includes an additional reference site adding 21,000 to the visitor numbers) or 87% of the peak figure. There is no basis for concluding that an addition of a further 500,000 Hectares to the reserve system will increase visitor numbers.

It should be noted that the past level of reservation of forested land into reserve systems in NSW and Queensland is now under review in public land inquiries. The need to restrict long term management for wood production on some areas already in reserves or mooted for future reserves is being reconsidered or is part of submissions to these inquiries.

This pattern has occurred in other countries, where locking up large tracts of land into reserve systems, has been found not to provide the best management, conservation and biodiversity outcomes.

Management of reserves

Specifically, it is unclear how the proposed reserves will be managed and funded in the long term ie where is the money going to come from??

Experience shows existing reserves are not as well managed as they could be and are underfunded. Roads fall into disrepair, introduced plants and animals continue to multiply largely unchecked and the fire risk increases every summer as only limited strategic fuel reduction burning is now being done to assist the control wild fires.

Parks and Wildlife achieved less than 20% of their target 10,000 hectares in 2012 of fuel reduction burns. There is 2.9 million Ha on public land in reserves, less 300,000 reserved in State Forest. Therefore there is some 2.6 million hectares managed by DPIPW and the area

on which controlled fuel reduction burns were achieved ia a tiny fraction of .08 of 1%.
(<http://www.dpiw.tas.gov.au/inter.nsf/WebPages/LJEM-7MM4MX?open>)

The Bushfire Royal Commission into the 2009 Black Saturday fires recommended a minimum of 5% of public land be subject to fuel reduction on a rolling annual program. If this were a desirable figure in Tasmania, then Parks and Wildlife would need to achieve prescribed burns on 130,000 ha each year or over 65 times the area burnt during 2012.

In addition about 20,000 ha of State Forest was subject to prescribed burns or about 1.7% of the area managed by Forestry Tasmania.

In addition we are already seeing lack of maintenance of forestry roads on public lands as FT has been less capable of funding its road infrastructure. (Blue Tier and Rheban/ Wielangta are but two examples). Within an increased reserve system, this would be exacerbated as many roads, which can now provide fire fighting access would be viewed as undesirable from a reserve management point of view and without an economic purpose, where would the funds come from anyway?

Fuel reduction and fire management on private land:

In our submission to MLC's in December we stated that "fire fighting capability has severely diminished with the downsizing of the forest contractor workforce. Many forests require fire or disturbance events as part of natural ecological processes. Such fire regimes have been considerably altered and the likelihood of catastrophic fires causing huge losses to property and unfortunately human life are inevitable. It is not a question of 'if' but 'when' a 'Black Saturday' will occur in Tasmania. Tasmania is not able to deal with such events. Unfortunately the TFA does not acknowledge, let alone address, these issues."

Obviously the fires over the recent two weeks have unfortunately made comments on fire fighting capacity more pertinent. This was an issue that was raised with MLC's and AFG representatives were questioned on this matter at our meeting in December.

AFG considers that the reduction in both public and private forestry has increased the risk of both property and forest losses due to the reduced availability of skilled forestry and contractor staff and machinery. We understand that the reduction in contractor numbers has been from 139 to 37 since the GFC. This includes contractors who harvest forests, replant/ regenerate forests and construct/ maintain forest roads. Most contractors employed a number of people and some silvicultural contractors at peak times had more than 100 employees.

There has been a loss of the skilled operators of forest machinery who were used to working in the forest environment and with the heavy machinery they used. This machinery has historically been relied on to open up trails against fire boundaries or to provide lines against which access for back burning and blacking out of fires could be carried out. Access to suppress fires is still required despite the use of helicopters for water bombing.

In addition, major companies operating on private forests maintained their own equipment including heavy 4WD tankers and had field staff with slip-on units fitted and contactable during the fire seasons. Also forest contractors were required to have on-site fire fighting equipment including tanks and pumps at all harvesting sites. Silvicultural contractors and their employees were part of the stand-by arrangements for fire fighting response on private forests and normally most of their vehicles would have slip-on fire fighting equipment fitted over the summer months.

The failure of two of the largest companies in the sector means the equipment and the consequent loss of employment and contract engagement has meant that the trained people to act as first response to fires on private forests are no longer available or severely reduced in number. Locking in a reduction in industry scale and potentially at a point less than critical mass as a consequence of the TFA is likely to mean less staff and equipment for fire response even with recovery of the sector. It is unclear how this loss of capacity will be made up and funded.

The construction of harvesting roads on private forests has also been essential to providing farm infrastructure and access to more remote parts of properties. A scaled back forest industry is less likely to be able to maintain these roads and landowners will have less incentive if wood markets are less competitive. These factors will also impact on fire fighting capacity and control.

AFG also believes that the guidelines and encouragement for fuel reduction burns need review. The implementation of fuel reduction on private land needs to be simplified and less capable of bureaucratic interference. The protection of lives, private forests and property on private land must take a higher precedence. The protection of biodiversity and special species habitat requirements needs to be viewed in the context of lessening the opportunity for major uncontrolled wildfire.

Conservation Goals:

The TFA risks good conservation outcomes on a Tasmanian and global scale. For some time it has been possible to buy European structural timber at comparable prices to that of Tasmanian produced timber. The carbon miles in bringing this timber half way around the world when Tasmania, with its own vigorous forests, should supply all this timber, is just one more example of another absurd outcome. Worse occurs with local or interstate markets wanting to source durable hardwood for specialty uses such as decking where we now find that merchants are more likely to be sourcing timber from less well managed but possibly still FSC accredited tropical forests, when product should be from better controlled, managed and renewable local sources.

AFG believes that Australia, with our huge land base and forest resource on a per capita basis, has a global responsibility to have a comprehensive and adequate reserve system. However this was established for our forests by Regional Forest Agreements on a scientific basis not on an ad hoc basis such as the TFA process.

AFG also considers that we have a responsibility to use our forest resources so as to not be sourcing our wood supplies from overseas regions with lower or no protection criteria. This will assist to protect global biodiversity and is positive for carbon emissions. Studies as part of the IGA process (the verification group) selfishly ignored global trade impacts.

Carbon:

Much is made of the potential for reserved Tasmanian forests to be carbon sinks and to have value in the carbon credit markets. Undisturbed reserved forests have a maximum carbon storage capacity before there is a balance between carbon sequestration and decay. They do not go on storing additional carbon in perpetuity. Therefore even if there is a carbon market value it is finite.

It is likely that periodic uncontrolled bushfires such as the 2009 Victorian fires (or the 2006 Tasmanian East Coast fires or the current Giblin River fire in the South West Wilderness of about 49,000 Ha), will release many times the amount of carbon produced by any harvesting and reforestation scenario over the longer term.

Harvested forests are renewable. The act of harvesting forests and producing wood products stores carbon in the end products. Therefore there is ongoing sequestration of carbon in actively growing forests and the wood products that we use and which surround us each day. AFG refers you to university studies funded by Forest and Wood Products Australia, financed by levies from wood purchasers and matched by Australian Government rural research funds.

For example the last paragraph of a study into Carbon storage in Tasmanian forests states: "Theoretical C Saturation for the entire State forest could only be realised if all State forest capable of supporting eucalypt forests were forested by eucalypts, with this eucalypt forest being simultaneously mature. This simultaneous ecological maturity would require regenerating, by fire, all the area capable of supporting eucalypts including that currently supporting rainforest, then preventing in perpetuity all subsequent disturbances such as wildfire, while preventing the transition of mature eucalypt forest to rainforest. This is both impossible and would be ecologically deleterious. Alternative management parameters and paradigms for managing C at the landscape-scale are, therefore, required."

([http://www.fwpa.com.au/sites/default/files/Carbon in Trees in Tasmanian State Forest .pdf](http://www.fwpa.com.au/sites/default/files/Carbon%20in%20Trees%20in%20Tasmanian%20State%20Forest.pdf))

A just released DPI NSW study concludes that "...production forests have a significantly higher greenhouse benefit than conservation forests when considering the full lifecycle of timber products as well as standing carbon in trees."

"Unlike conservation forests, production forests provide additional greenhouse gas reduction benefits through wood products, generation of bioenergy, providing substitutes for more greenhouse-intensive building products such as concrete and steel and minimising the need for greenhouse-intensive imports."

(<http://www.dpi.nsw.gov.au/research/topics/climate-change>)

It is noted that the methodology for any reserves created in Tasmania to be included under the provisions of the Australian Government's *Carbon Credits (Carbon Farming Initiative) Act 2011* is not yet developed. (Appendix to Whole of Government submission to Legislative Council Committee, January 2013).

Private Sector Impacts of the TFA and proposed Legislation:

There have been very significant impacts on the ability to market wood from private forests over the last 2-3 years due to matters such as the Global Financial Crisis, high Australian dollar, the Japanese tsunami and environmental activism. Impacts on markets has been due to a range of factors not one factor alone.

The decision by one major processor to withdraw from Tasmanian native forests was obviously linked to their perception that this would assist acceptance of their pulp mill proposal. It was note-worthy, that as part of this arrangement, environmental focus then switched to the next largest processor of native forest wood, Ta Ann, who have largely been dependent upon State Forest log supplies.

The Gunns decision was also compensated by a payment for their sawlog licences, which partly went to Forestry Tasmania to pay Gunns' debts with this GBE. The remainder paid to Gunns, was most likely used to pay down the banks. Gunns used access to eucalypt plantations in southern States other than Tasmania, to substitute Tasmanian plantation wood for mainland wood to meet their contracts. This wood, due to land leasing arrangements and the provisions under MIS documents had to be harvested to a timetable. This volume coming on to the market in depressed market conditions and also having to be moved, resulted in considerable market distortion. This distortion to export wood pricing is currently on-going.

The end result of these changes and the reduction in harvest levels in Tasmania has greatly impacted wood flows from private land as well as employment in harvesting and silvicultural contracting and cash flow for private forest owners.

The TFA and the proposed legislation will lock in a forest industry at a greatly reduced scale. We can already see the economic repercussions of the current downturn with the large increase in unemployment and depressed workplace participation in Tasmania. **The TFA reduces market opportunities for private forest owners due to scale reductions, market competitiveness due to fewer processors and a reduction in product diversity.**

The TFA may also add to barriers to enter the marketing of private wood, if FSC accreditation becomes a requirement for wood sales, with no likely stumpage price premium but an added degree of complexity. Anecdotally, banks already will not attribute a value to native forest timber quantities on private land, therefore reducing the security and real estate value of large areas of private land across Tasmania.

The risk is that if the private forest estate is seen as a liability, then there is less incentive to manage and protect these forests for their full range of values including wood production. There is a risk that these unmanaged forests will become degraded to allow

other economic uses. This will be a reversal of the positive management that has built up over the last 30 years for many private native forests around the State to provide for more intense selective harvesting of these forests.

Socio-economic Modelling:

As provided in Section 17 of the TFA, there should be Socio-economic modelling of the regional and state-wide impacts of the TFA.

However, **it is irrational to pass legislation and then do a study on its impact following.** This study should be done prior to any final commitment to the proposed legislation.

Triabunna:

Ensuring the opportunity to export wood residues from the south of Tasmania via Triabunna needs to be part of any outcome as provided in Section 30 of the TFA. The inability of southern sawmills to sell their residue is a major impediment to profitable operations. The deal whereby environmental interests were able to secure this mill when a forest industry participant had funding and was offering significantly more for the mill should be investigated, particularly with regard to the political influences involved.

Residues:

AFG supports Section 31 of the TFA. Any harvesting, whether of native forest or plantations will produce residues. There should be support for further processing of these residues within Tasmania to value-add to the Tasmanian resource and to provide more secure employment for Tasmanians.

However, having markets for residues, whether domestically or through export is a durability matter and environmental activism impacting on residue processing or export should be treated as a serious transgression.

It is essential that all residue market opportunities can be accessed and that there is no regulatory outcome through an extension of the TFA process that limits the range of markets targeted. For example if ethanol becomes an alternative to the traditional woodchip market, then AFG would be opposed to a narrowly focused ruling preventing its development.

Plantations:

The private sector manages most of Tasmania's plantation estate. There was rapid expansion, particularly of eucalypts of this estate during the 2000's. Many of these plantations are on leased land with many individual owners. Due to the collapse of MIS companies control and future management of these plantations is uncertain.

Another serious issue is how the replacement of the plantation estate is going to be funded. Many of the eucalypt plantations have been established by pooled investment structures with Australian investors. In the current investment climate this will be difficult to repeat. It is also difficult to attract long term Australian institutional funding for plantation establishment. The end result is that most Australian forest plantations are now owned or controlled by overseas pension and fund managers.

More of Tasmania's future wood flow will come from these plantations so ensuring access to these plantations and unimpeded management is an important outcome. In the past ENGO's have protested about various aspects of plantation management despite the practices being common agricultural techniques and the amount of regulation imposed on the sector. **It is important that there is proper recognition of the increasing role that private plantations will play in Tasmania's wood resource and that these plantations are regulated to no greater degree than other agricultural enterprises.**

Sections 22 -27 of the TFA discuss the implementation of a utilisation plan for existing and future plantations and for research, with this being overseen by the Signatory / stakeholder group. The private grower sector needs to be represented on this group as the outcomes need to be acceptable to growers of the plantation resource or the desired outcomes probably will not happen.

Conclusion:

AFG does not believe that the Bill and the Tasmanian Forests Agreement are in the best interests of all Tasmanians and is opposed to it proceeding. AFG questions whether there is any demonstrable long term benefit to locking up another 500,000 Hectares in a State with 45% of its land mass already within reserve systems and is concerned at the ongoing cost of properly maintaining these additional reserves.

Regardless, AFG considers that the proposed legislation, based on the recently signed-off TFA, is deficient and does not comply with the terms of the TFA. AFG believes the legislation is being imposed on Tasmanians in an undemocratic manner and with undue haste.

AFG has major concerns with the durability arrangements and seeks major changes including a binding commitment to the removal of favourable exemptions in a range of existing legislation that allows misinformation to be used by environmental groups in an improper manner without adequate opportunity to challenge it.

Any tranches of reservation should be made only after proper scientific examination and on a much reduced scale over a longer period of time and only after proper compliance with all durability issues. New reservations should not be of a status, which restricts access by Tasmanians to these reserves and options for future generations to choose to use their resources for production purposes.

AFG also believes that the process is flawed by sovereign risk, lack of transparency over the management of production forests and the role of the forest manager, lack of consultation with all stakeholders and lack of reforms to the Forest Practices Authority.

AFG does not believe that the reduction in the scale of the Tasmanian Forest Industry will in the longer term benefit Tasmanians, their employment opportunities, carbon sequestration, conservation, biodiversity or market opportunities. The final outcome needs to ensure flexibility and to retain options for future generations of Tasmanians.

AFG recommends that the Legislative Council should take whatever time is needed to adequately assess the implications of the proposed legislation. It is obvious that a series of substantial amendments and additions are required to the existing Bill even if the Legislative Council decides that it should be progressed.

AFG is concerned that the TFA will adversely impact private forest owners and that there has been no consideration of this impact. The TFA encourages a permanent shrinking of the forest industry. The uncertainty created by negotiations over the last two years plus market activism in a poor market cycle has decimated market opportunities for the Tasmanian private forestry sector.

A positive approach, without rewarding misinformation by ENGO's, can lead to a restoration of markets with a recovery of economic conditions and building activity. This would be a far more positive approach to restoring a sector, which can continue to be a key part of Tasmania's economic future and its economic diversity.

Table 1 extract from Private Forests Tasmania annual report 2011-12

| Private forests harvest volumes 2007-8 to 2011-12 (tonnes) –with and without fuel wood | | | | | |
|---|------------------|------------------|------------------|------------------|------------------|
| 2007-08 | 2008-09 | 2009-10 | 2010-11 | 2011-12 | |
| NATIVE HARDWOOD | | | | | |
| Native Sawlog, Veneer & Ply | 51,980 | 39,435 | 54,067 | 54,133 | 28,894 |
| Hardwood Pulpwood | 1,134,118 | 891,641 | 537,740 | 426,650 | 105,064 |
| Minor Log Products | 416 | 912 | 1,250 | 321 | 84 |
| Fuel Wood | 356 | 2,110 | 1,170 | 800 | 4,812 |
| <i>Total NF including fuel wood</i> | <i>1,186,870</i> | <i>934,098</i> | <i>594,227</i> | <i>481,904</i> | <i>138,854</i> |
| Total NF excluding fuel wood | 1,186,514 | 931,988 | 593,057 | 481,104 | 134,042 |
| PLANTATION HARDWOOD | | | | | |
| Hardwood, Sawlog, Veneer & Ply | 16,800 | 4,977 | 3,712 | 4,514 | 364 |
| Hardwood Pulpwood | 1,103,366 | 998,512 | 807,411 | 741,124 | 252,657 |
| Minor Log Products | 0 | 0 | 0 | 181 | 1,500 |
| Fuel Wood | 0 | 0 | 0 | 0 | 0 |
| <i>Total HW including fuel wood</i> | <i>1,120,166</i> | <i>1,003,489</i> | <i>811,123</i> | <i>745,819</i> | <i>254,520</i> |
| Total HW excluding fuel wood | 1,120,166 | 1,003,489 | 811,123 | 745,819 | 254,520 |
| PLANTATION SOFTWOOD | | | | | |
| Softwood Sawlog, Veneer & Ply | 201,571 | 46,164 | 64,991 | 125,495 | 384,601 |
| Pulpwood | 354,080 | 192,878 | 230,646 | 268,655 | 327,972 |
| Minor Log Products | 3,671 | 3 | 339 | 901 | 2,968 |
| Fuel Wood | 0 | 0 | 2,320 | 0 | 40 |
| <i>Total SW including fuel wood</i> | <i>559,322</i> | <i>239,045</i> | <i>298,296</i> | <i>395,051</i> | <i>715,581</i> |
| Total SW excluding fuel wood | 559,322 | 239,045 | 295,976 | 395,051 | 715,541 |
| GRAND TOTAL including fuel wood | 2,866,358 | 2,176,632 | 1,703,646 | 1,622,774 | 1,108,955 |
| GRAND TOTAL excluding fuel wood | 2,866,002 | 2,174,522 | 1,700,156 | 1,621,974 | 1,104,103 |

Table 2 extract from Private Forests Tasmania annual report 2011-12

| Native forest and plantation harvest from private forests as a percentage of the total harvest* | | Plantation harvest | | Plantation harvest exceeds native forest | |
|---|-----------|--------------------|-----------|--|------------|
| Native forest harvest | | | | | |
| Year | Tonnes | Percentage | Tonnes | Percentage | Percentage |
| 2007-08 | 1,186,870 | 41.4 | 1,679,488 | 58.6 | 41.5 |
| 2008-09 | 934,098 | 42.9 | 1,242,534 | 57.1 | 33.0 |
| 2009-10 | 594,227 | 34.9 | 1,109,419 | 65.1 | 86.7 |
| 2010-11 | 481,904 | 29.7 | 1,140,870 | 70.3 | 136.7 |
| 2011-12 | 138,854 | 35.3 | 970,101 | 87.5 | 598.6 |

Table 3 extract from Private Forests Tasmania annual report 2011-12

| Plantation hardwood pulpwood as a % of total hardwood pulpwood from private forests | | Plantation hardwood pulpwood | |
|---|-----------|------------------------------|------------|
| Native forest pulpwood | | | |
| Year | Tonnes | Tonnes | Percentage |
| 2007-08 | 1,134,118 | 1,103,366 | 49.3 |
| 2008-09 | 891,641 | 998,512 | 52.8 |
| 2009-10 | 537,740 | 807,411 | 60.0 |
| 2010-11 | 426,650 | 741,124 | 63.5 |
| 2011-12 | 105,064 | 252,657 | 70.6 |

“Contribution to overall State forest products supply

Production statistics for the State owned forests provided by Forestry Tasmania have been combined with the private estate figures above and a comparison of the data reveals that the trend of recent years of a diminishing contribution from the private estate to the overall forest products supply has been reversed.

In 2008-9 the private estate contributed 39.7% to state production, in 2009-10 36.6% and in 2010-11 the contribution was 34.0%. For the 2011-12 year, despite an overall reduction in the production level from private forests of nearly 32%, the contribution to the overall state production of forest products climbed back to a little under 45%.

Some caution needs to be exercised in drawing profound conclusions from this analysis due to changes in the ownership status of the previously State owned pine estate. However, even considering this, it is reasonable to draw the conclusion that while all sources of forest products have been severely impacted by reduced market demand, the production level from the private estate has reduced to a lesser degree than that from State owned forests.”

(extract from Private Forests Tasmania annual report 2011-12)