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Dear Sir/Madam,

**Re: Submission to Australia's Biodiversity Conservation Strategy 2010-2020 – Consultation Draft.**

Thank you for the opportunity to make a written submission to the Australia's Biodiversity Conservation Strategy 2010-2020 – Consultation Draft ('Draft Strategy').

Australian Plantation Products & Paper Industry Council ('A3P') is the national industry association representing the interests of all segments of the plantation-based wood products and paper manufacturing industry. A3P member's employ more than 13,500 people in plantation/forest management, sawmills, panel board, and paper manufacturing plants, mainly in rural and regional areas. Each year A3P members create and sell more than \$4 billion of products, produce more than 12 million cubic metres of logs, 3 million cubic metres of sawn timber and more than 2 million tonnes of paper.

Please find attached A3P's written submission to the Draft Strategy for your consideration.

A3P looks forward to continue to work constructively with the Department of Environment, Water, Heritage and the Arts in the finalisation of the Draft Strategy. If you have any questions in relation to the matters raised above please contact me (**02 6273 8111** or [richard.stanton@a3p.asn.au](mailto:richard.stanton@a3p.asn.au)).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Stanton', written over a white background.

**RICHARD STANTON**  
Chief Executive Officer



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# **A3P Submission To Australia's Biodiversity Conservation Strategy 2010-2020 – Consultation Draft.**

Biodiversity Conservation Branch  
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Thank you for the opportunity to make a written submission to the Australia's Biodiversity Conservation Strategy 2010-2020 – Consultation Draft ('Draft Strategy').

**Australian Plantation Products & Paper Industry Council (A3P)** is the national industry association representing the interests of all segments of the plantation-based wood products and paper manufacturing industry. A3P member's employ more than 13,500 people in plantation/forest management, sawmills, panel board, and paper manufacturing plants, mainly in rural and regional areas. Each year A3P members create and sell more than \$4 billion of products, produce more than 12 million cubic metres of logs, 3 million cubic metres of sawn timber and more than 2 million tonnes of paper.

A3P and its member companies are committed to sustainable action, today and well into the future both at a national and international level. To put some perspective on land-use across Australia; there are 149 million hectares of forest in Australia, (19.2% of the land area); 1.97 million hectares are plantations (both hardwood and softwood) (0.25% of the land area); 29.4 million hectares are agricultural and horticultural crops (3.8% of the land area); and 385 million hectares are grazing (50% of the land area). Although small in percentage terms forestry and plantations play a key part in landscape and biodiversity management in Australia.

Plantation forestry is one land-use in Australia and is managed under ecological sustainable principles. A percentage of the land area in a planned plantation is not planted to the crop trees but left as retained native vegetation, or woodland corridors, or buffer strips, the majority being riparian zones high in biodiversity and environmental values.

### **Australia's Biodiversity Conservation Strategy 2010-2020 – Consultation Draft ('Draft Strategy')**

The Draft Strategy details six 'priorities for change' as key changes proposed to be explored and addressed, A3P supports the proposed six priorities as key areas to develop in the Draft Strategy.

The Draft Strategy further proposed the following main threats to Australia's biodiversity;

- Climate Change;
- Invasive species;
- Loss, fragmentation and degradation of habitat;
- Unsustainable use of natural resources;
- Changes to the aquatic environment and water flows; and
- Inappropriate fire regimes

***This submission details some of the plantation forestry and timber industries' initiatives in regard to the proposed threats to biodiversity detailed in the Draft Strategy, and to raise some specific concerns about the Draft Strategy.***

## **A3P Sustainability Action Plan (SAP) and Plantation Forestry's Role in Biodiversity**

A3P members manage approximately 1.1 million hectares of hardwood and softwood plantation, and approximately 4.3 million hectares of native forest. The native forest estate is sustainably managed for multiple values such as biodiversity, carbon, recreation, timber production, soil, water, and cultural heritage. The native forest estate is either contiguous with the plantation estate or spatially independent. Australia's plantation products and paper industry has always taken its economic, environmental and social responsibilities seriously. Effective environmental stewardship is not just critical for the continued business success – it underpins the sustainable future to which our society aspires.

To this end A3P developed and implemented a Sustainability Action Plan (SAP). The SAP is the result of strong consultation with A3P's member companies and representatives from the major NGO environmental groups in Australia. Their contribution is invaluable. The SAP adopts a product stewardship approach which recognises that growers, manufacturers, importers, governments, and consumers all share responsibility for the environmental impact of a product throughout its full life cycle.

The SAP aims to:

- Establish sustainability principles to which all A3P members are committed;
- Identify future challenges and risks;
- Report objectives, actions and targets;
- Report environmental statistics; and
- Regularly report case studies to illustrate key improvements.

The SAP contains many new initiatives and builds on existing initiatives, regulatory requirements, compliance levels, and certification schemes from within and beyond our industry. Implementing its recommendations will reduce the industry's use of water, chemicals and energy, reduce emissions of greenhouse gases and pollutants, and also ameliorate salinity. It will also help re-invigorate rural economies.

The SAP, launched in May 2006 and revised in 2008, is comprehensive, forward looking, and designed to keep the industry focused on actions relating to the 21 broad sustainability issues it addresses, including biodiversity, research and development, indigenous employment and sustainability which covers elements of all 6 "priorities of change" detailed in the Draft Strategy.

### **A3P's SAP and Biodiversity**

The SAP details the following specific comments with respect to biodiversity:

*Plantation forestry—involving both non-native and native tree species—is increasing, although it still only occupies a small percentage of suitable agricultural land. For the most part in Australia, plantations are established on land already cleared and are managed much like agriculture. They need to be seen as such. It is unrealistic, therefore, given the cost and price pressures of the market, to expect plantations to be able to achieve the biodiversity of native forests, but much can be done to*

ensure they make a contribution to conserving and enhancing Australia's biodiversity.

According to the most recent comprehensive publication on this topic in Australia *Trees and Biodiversity* by Salt and Lindemayer, "There are no precise formulas or prescriptions (yet)." However there is much that can be learnt from efforts to date and much research is currently being undertaken to improve understanding of how to improve the biodiversity conservation of plantations. Salt and Lindenmayer's book is the first to provide a comprehensive basic framework for improving the biodiversity value of various forms of farm forestry.

In 2003 CSIRO overviewed the scientific research that reported little positive to say about biodiversity and plantations. New reports show that, even though the CSIRO report is only a few years old, considerable research into biodiversity in plantations has been done since it was compiled.

The new studies have shown that plantations, if well designed, can contribute much more than previously thought to biodiversity conservation. The Tumut Fragmentation Experiment has identified some of the ways for such biodiversity improvement. The experiment is focused on the Buccleuch State Forest 100km west of Canberra in southern New South Wales, a 50,000 ha plantation of radiata pine (*Pinus radiata*), an exotic softwood species established on areas that formerly supported native eucalypt forest. Many investigations are now being initiated, similar to the Tumut experiment, and it is expected that the understanding of how to improve the biodiversity value of plantations will increase considerably in the coming years.

Plantation forestry's key biodiversity strategies and actions under the SAP going forward are

- Assist the development of structures that enhance biodiversity benefits from plantations including biodiversity credits.
- Undertake monitoring and protection of biodiversity.
- Integrate the identification, evaluation and management of biodiversity into planning, decision making and reporting.
- Siting and design of plantations to complement remnant native vegetation.
- Protect riparian zones.

**A3P submits the SAP to the review as an example of a significant industry initiative in terms of addressing biodiversity and broader triple bottom line issues (economic, social, and environmental). Application of this form of initiative across other industries would go a long way to achieving better biodiversity outcomes. The SAP can be found at: [http://www.a3p.asn.au/admin/assets/pdf/A3P\\_SAP\\_2008\\_5.pdf](http://www.a3p.asn.au/admin/assets/pdf/A3P_SAP_2008_5.pdf)**

### **Ecological Sustainable Forest Management and Certification**

Two linked broader plantation forestry and timber industry initiatives address key biodiversity issues including the proposed threats, such as invasive species; loss, fragmentation and degradation of habitat; unsustainable use of natural resources; changes to the aquatic environment, are ecological sustainable forest management and associated certification.

*Forests play a significant role in biodiversity management (above their percentage of total land-use in Australia) and the main tool that underpins this objective is ecological sustainable forest management.*

The key principles of ecological sustainable forest management is the simultaneous management of forests for multiple uses, integrating commercial and non commercial objectives such as biodiversity management, timber production, recreation, aesthetics, grazing, soil and water catchment protection, carbon sequestration, cultural and scientific values

*A3P recommends the adoption and implementation of the core principles of ecologically sustainable forest management to all land use management domestically and internationally as the best method to achieve biodiversity and triple bottom line outcomes.*

**Sustainable Forest Management Certification** - A3P has encouraged its members to seek independent sustainable forest management certification or chain of custody certification to demonstrate the sustainability aspects of their forest management to governments, citizens and the marketplace. In addition the SAP includes a commitment to increasing levels of forest certification to 70 per cent of members and 70 per cent of hectares by 2015. Two of the main sustainable forest management schemes are The Programme for the Endorsement of Forest Certification (PEFC) and the Forest Stewardship Council (FSC). The PEFC includes the Australian Forestry Standard (AFS).

*Certification is seen by A3P as a vehicle to ensure that sustainable forest management (with biodiversity as a key environmental issue) is adopted, practiced, and is the culture of land managers across Australia.*

#### **Existing policies, framework and legislation context for the Draft Strategy.**

Forest policy in Australia took a quantum shift when the National Forest Policy Statement was released in 1992 (which envisaged significant changes to the management of native forests, and renewed emphasis on plantation and farm forestry development) this led to other key policy initiatives such as: Plantations for Australia: the 2020 Vision; National Action Statement for Farm Forestry; the Regional Forest Agreements between the Federal and State Governments.

*The Draft Strategy should be developed in the context of these broad forest policies to which the Australian Government is already committed..*

#### **Fire Regimes and Biodiversity**

A concern of A3P is misconceptions regarding fire management and its impact on biodiversity (specifically in forested land). A3P members include significant land and forest managers (of plantation, native forest and other land). These A3P members have a significant current and historical role in fire detection, suppression and management on land directly managed by them and on adjacent land holdings in the various states of Australia. These organisations play a key role (and have had a long successful history) in fire management on a landscape scale (across differing land tenures, land uses, and fuel

types) including fire suppression, fire prevention, fire policy input, fire planning and management. This includes investment in fire prevention, detection, and suppression resources, commensurate with the plantation asset value and fire risk.

Strategic hazard reduction burning is a key prevention strategy utilised by forest managers to reduce fuel load and the risk of large bushfires. Other strategies include grazing, mechanical hazard reduction (mineral earth breaks), community education, and regulation of potential fire ignitions. Strategic hazard reduction burning has been shown, by extensive research, real fire experience and history, and acceptance by land and forest managers, to be the most effective fire prevention and mitigation tool in a land/forest manager's arsenal. Fire has been natural part of the Australian environment for thousands of years and has shaped our ecosystems. Indeed many of our species and ecosystems need fire to regenerate. The precise effects of bushfires on biodiversity are dependent on many factors such as intensity, site conditions, extent and season. Intense mega fires effect forest and soil health, biodiversity, protection of threatened species and our water catchments.

***Reduction of the occurrence and mitigation of the effects of mega fires in the Australian landscape should be the target and strategic hazard reduction burning should be a key prevention strategy to achieve this.***

### **Climate Change Initiatives**

A3P's structure mirrors the integrated nature of the plantation products and paper industry supply chain. Our industry is unique because the start of that supply chain is a tree, which stores carbon during growth. That carbon storage is maintained in finished forest products throughout their life and even after disposal. Forest fibre is recycled, forest and timber residues and by-products from manufacturing are used to produce renewable heat and power, and carbon storage in the forest stand is perpetuated through the continuous cycle of harvesting and replanting. This makes ours the only carbon positive industry in Australia. A3P members acknowledge that climate is changing as a result of human intervention and that action is required.

***A3P members' different businesses along the supply chain are all part of the climate change solution. In terms of the forest grower's response to the impacts of climate change on the environment, the goal of ecological sustainable forest management is entirely congruent with increased biodiversity values into the future.***

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