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Submission – 22 June 2018

Independent review of the interaction between the EPBC Act and the agriculture sector

The Forest Industries Federation WA (FIFWA) is the association for the timber industry in Western Australia. FIFWA represents a membership that includes almost all the major companies and businesses that operate in the WA timber industry, including commercial plantation growers, harvest and haul operators, and processors in both the native forest and plantation sectors.

We welcome this opportunity to provide input into the independent review of the interaction between the EPBC Act and the agriculture sector. This submission should be considered in concert with the submission prepared by our industry's national representative body, the Australian Forest Products Association (AFPA).

We are aware that forestry operations undertaken in areas covered by a Regional Forestry Agreement (RFA) are out of the scope of the review. We note that private native forestry (where not covered by an RFA) may be considered in the review where there are interactions with the EPBC Act and when deemed appropriate by the independent reviewer.

We have chosen not to respond to the ten *key questions for consultations* in the review briefing paper.

Instead, we wish to highlight the impact of the EPBC Act on a crucial element of the timber industry in Western Australia.

Carnaby's Cockatoo (*Calyptrorhynchus latirostris*), was listed in July 2000 as endangered under the EPBC Act. With clearing of native vegetation on the Swan Coastal Plain, the cockatoo has adapted to pines as a key food source.

Thousands of hectares of pine plantations have been established over decades by the Forest Products Commission (FPC) and private growers. This softwood plantation estate has been the catalyst for a processing industry worth \$617 million a year to the economy, and a substantial contribution to the more than 6,000 jobs generated by the WA timber industry overall.

There is well over \$1 billion worth of existing investment in plantation based primary processing infrastructure in WA, including the only Australian Laminated Veneer Lumber (LVL) manufacturer; Australia's largest particle board plant; significant sawmilling facilities which provide structural pine to the local construction industry; pallet and packaging manufacturers; timber treatment plants; and several key port processing and handling facilities. The economic diversity provided by the industry is particularly significant in regional areas where much of the industry is based.

This extensive investment and employment generated in the softwood plantations and processing sector would be exposed to unacceptable risk with potential EPBC Act referral associated with harvesting pine plantations.

Barriers to investment in establishing pine plantations include the cost of purchasing land; high input costs; and long investment timelines. Interactions between the EPBC Act and industry add a layer of uncertainty about whether government and private investors, after waiting thirty years for trees to reach maturity, would be allowed to harvest their crop. Beyond a potential devastating blow to industry, it would be a perverse outcome if measures designed to protect cockatoo foraging habitat created a situation where supplemental foraging resource is discouraged from being established.

FIFWA appreciates the opportunity to provide input into the independent review of the interaction between the EPBC Act and the agriculture sector. Please don't hesitate to contact me for any queries associated with this submission.

Yours sincerely,

Matt Granger
Acting CEO