11 July 2023

To:

Private Forests Tasmania

admin@pft.tas.gov.au

Dear Private Forests Tasmania,

BirdLife Australia and BirdLife Tasmania submission in response to the draft Forestry (Miscellaneous Amendments) Bill 2023 (the draft Bill).

Thank you for the opportunity to provide comment on the draft Bill's proposed amendments to the *Forest Practices Act 1985* and the *Private Forests Act 1994 Amended.*

BirdLife Australia and BirdLife Tasmania hold serious concerns that the proposed legislative changes in the draft Bill could lead to significant incremental and cumulative environmental impacts on native bird habitat with reduced opportunities for public scrutiny.

Forest Practices Act

The draft Bill proposes to amend the Forest Practices Act to allow private timber reserve operators to extend their boundaries by 10% of the original area, up to a maximum of 50 hectares, without completing the public notification and objections phases currently triggered under the Act.

We are concerned that the proposed amendments may inadvertently facilitate greater incremental and cumulative negative environmental impacts including:

- The 50 hectare "minor boundary extension" proposed by the draft Bill may seem trivial but when viewed together is a clear example of the "death by a thousand cuts" of remnant native habitat.
- Threaten connectivity across landscapes and habitat buffers that currently exist between remnant vegetation and operational private timber reserves, with impacts on a scale extending beyond 100m of reserve boundaries. Retaining remnant native forests and connectivity for biodiversity remains a conservation priority.
- Restricting the right to object to 'prescribed persons' means that there is no potential for objection from anyone concerned or affected in a broader landscape context.

- The draft Bill does not clearly define the number of "minor boundary extensions" that a private timber reserve operator can proceed with under the Act. Potentially allowing the cumulative destruction of hundreds of hectares of remnant forest without being advertised or subjected to public scrutiny and potential objection.

Private Forests Act 1994 Amended

The draft Bill proposes to amend the Private Forests Act to "modernise and update" the functions of the Board of Private Forests Tasmania (PFT). We are specifically concerned regarding to the proposed changes to 6.1(J) which potentially could dilute PFT's authority to examine matters relating to the conservation of native birds and their habitat by removing the explicit reference to "flora, fauna, and land forms and "care of the environment" on private forest lands. We recommend that the draft Bill retains 6.1(J) as written.

Recommendations

Our three main recommendations are summarised below:

1. Objections to private timber reserves can be made by any member of the public and not only "prescribed persons".
2. The draft Bill is amended to include a limit on the number of occasions an operator can make a "minor boundary extension".
3. The draft Bill retains 6.1(J) of the Private Forests Act 1994.

Given the current extent of private forestry in Tasmania and the already limited opportunities for the public to participate in decisions around forestry in private timber reserves, we recommend that objections to private timber reserves can be made by any member of the public and not only "prescribed persons".

If you have any queries on this submission please contact BirdLife Australia's Campaigns Manager, ██████████████████████████████████████ ████

Kind regards,

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Program Leader – Terrestrial Birds   Convenor, BirdLife Tasmania

About BirdLife Australia and BirdLife Tasmania

BirdLife Australia is an independent science-based bird conservation charity with over 330,000 supporters throughout Australia. We support research, conduct monitoring and run citizen science programs to inform and guide conservation of native birds and their habitat.

BirdLife Tasmania is a regional Branch of BirdLife Australia, and advocates for the conservation of Tasmanian birds and their habitat.