

# Private Forests Tasmania

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31 October 2023

State Planning Provisions Review Team  
State Planning Office  
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## State Planning Provisions review – plantation forestry

I am writing to raise an issue with regard to plantation forestry within the State Planning Provisions (SPPs). Private Forests Tasmania has not previously made a submission during the earlier rounds of public consultation on the SPP review, however your online presentation on the SPP's from 11 August 2023 and posted on your website invites further submissions.

Private Forests Tasmania (PFT) is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our [Corporate Plan 2023-26](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

The issue we want to raise is with the definition of plantation forestry within the SPP. In the SPP, plantation forestry:

*means the use of land for planting, management and harvesting of trees for commercial wood production, but does not include the milling or processing of timber, or the planting or management of areas of a farm for shelter belts, firewood, erosion or salinity control or other environmental management purposes, or other activity directly associated with and subservient to another form of agricultural use.*

Whereas in the *State Policy on the Protection of Agricultural Land 2009*, plantation forestry:

*means the use of land for planting, management and harvesting of trees predominantly for commercial wood production, including the preparation of land for planting but does not include the milling or processing of timber, or the planting or management of areas of land for shelter belts, **woodlots**, erosion or salinity control or other environmental management purposes, or other activity directly associated with and subservient to another form of agricultural use.*

Whilst there are a number of minor differences in the wording of the two definitions, the difference of concern to PFT is the omission of the term ‘*woodlots*’ from the wording in the SPP definition (highlighted in yellow above in the State Policy definition).

Woodlots are a form of farm forestry consisting of small scale plantings of commercial trees, generally between 5–20 hectares in size. They are like shelter belts in that they are often planted for the multiple benefits trees can provide a farm such as shelter, shade, water quality, carbon, biodiversity, aesthetics and of course wood production. They differ from shelter belts only in the configuration of the planting. Shelter belts are usually planted in linear rows whereas woodlots can be planted in any configuration.

The omission of the term ‘*woodlots*’ from the wording in the SPP definition, as is currently the case, we believe creates confusion amongst local government planners and the public alike about the planning status of small-scale farm woodlots and whether or not they should be lumped together with larger industrial scale plantations (= plantation forestry). The consequences of lumping them in with larger scale industrial plantations is that their use is made more restrictive under certain zones within the SPP. This is at a time when both the Australian and State Governments have policies and programmes encouraging farm forestry and the planting of commercial trees across the agricultural landscape (see the Australian Government’s [Farm Forestry – Growing Together](#) strategy released in 2022 and PFT’s own [Tree Alliance](#) program). These policies recognise the multiple benefits and value of having more trees on farms.

To avoid confusion, and to align the SPP with other government policies and programmes, PFT recommends inserting the term ‘*woodlots*’ into the SPP definition in the same way as it is used in the *State Policy on the Protection of Agricultural Land 2009* definition of plantation forestry. A suggested amended definition for the SPP is:

*Plantation forestry means the use of land for planting, management and harvesting of trees for commercial wood production, but does not include the milling or processing of timber, or the planting or management of areas of a farm for shelter belts, woodlots, firewood, erosion or salinity control or other environmental management purposes, or other activity directly associated with and subservient to another form of agricultural use.*

If you have any queries on the points we have raised, please contact me on 0409 843 928 or our Policy & Data Officer Murray Root on 03 6165 4072.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Murray Root', with a stylized flourish at the end.

**Dr Elizabeth Pietrzykowski**  
CEO Private Forests Tasmania