

# Private Forests Tasmania

PO Box 180, Kings Meadows 7249  
Tel: (03) 6777 2720  
Email: [admin@pft.tas.gov.au](mailto:admin@pft.tas.gov.au)  
[pft.tas.gov.au](http://pft.tas.gov.au)

Free Helpline 1300 661 009

11 October 2023

Integrated Farm and Land Management Method Development Team  
Department of Climate Change, Energy, the Environment and Water

[AccuMethods@dcceew.gov.au](mailto:AccuMethods@dcceew.gov.au)

Inquiries: Dr Elizabeth Pietrzykowski

Phone: [REDACTED]

Email: [REDACTED]

Our Ref: D23-300472

Your Ref: [\[Click to enter text\]](#)

## Integrated Farm and Land Management Method

Thank you for providing an information session on the development of the Integrated Farm and Land Management (IFLM) method last Thursday 5 October 2023. Staff from Private Forests Tasmania attended last week's online session and have participated in the co-design process for the method over the last couple of years.

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.

We were disappointed to hear that the IFLM method currently does not include any eligible activity types that involve commercial tree planting options, specifically plantation forestry. This seems at odds with other Australian and State Government policies that are trying to encourage more plantation trees across our landscapes, particularly plantation trees on farms.

In 2018 the then Australian Government released a policy to plant a billion plantation trees by 2028 under the [Growing a Better Australia](#) plan to meet Australia's growing timber shortage. That equates to 400,000 hectares of new plantations over a decade. Expanding the farm forestry estate was one of the keys to realising the billion trees plan and in 2022 the Australian Government released its [Farm Forestry – Growing Together](#) strategy to give further momentum to these efforts.

The new Australian Government has all but adopted the previous Governments policy of expanding the plantation estate through its own *A Better Future for our Regions* and *A Future Grown in Australia* policies. They have backed this up by allocating \$73 million in the 2022–23 Budget to be used over four years from 2023–24 to support the establishment of new long-rotation softwood and hardwood plantation forests. However, further policies and incentives

are needed as a priority to meet Australia's future timber needs and our ambitious emission reduction targets. It was anticipated by many in the forestry and agricultural sectors that the IFLM method would provide a key incentive for farm forestry by incorporating plantation trees as an eligible activity.

It was not stated in last Thursday's online presentation why plantation forestry has been left out. It has been suggested to us that the reason might be that the plantation forestry components of FullCAM have not had the necessary version updates. If this is the issue then we suggest that DCCEEW include plantation forestry as an eligible activity and then manage the versioning deficit through the FullCAM guidelines rather than further delaying it.

PFT recognises the complexities of introducing all four of the existing Plantation Forestry Method project activities (schedules 1-4) into the current draft IFLM method and then meeting DCCEEW's tight timeframe. However, by only including the schedule 1 activity, new plantation establishment, (and perhaps schedule 2 short to long rotation conversion) much of this complexity is avoided. Similarly, if the standalone measurement-based Farm Forestry Method activity was also included as an eligible activity then there would be both a measurement and modelled estimation approach available which would mesh very well with the architecture of the current draft IFLM method.

One of the main barriers to uptake of the existing Plantation Forestry and Farm Forestry Methods is the high project transaction costs. This is particularly the case for farmers who may only want to commit a part of their farm (10-50 ha) to growing commercial trees. The 'stacking' feature of the IFLM method goes some way to address this barrier by enabling the farmer to stack their 10-50 ha of commercial trees with, for example, a soil carbon activity and an environmental planting activity into the same project. This reduces the per unit transaction costs and helps remove the barrier. However as stated in the above paragraphs, a commercial tree planting option is needed as an eligible activity in the IFLM method if this is to occur.

PFT urges DCCEEW to reconsider the inclusion of plantation forestry in the new IFLM method. Including plantation forestry will align the new method with an array of other Government policies and programs aimed at getting more commercial trees planted across the landscape. Delaying it until the establishment of the proponent led method development process will cause significant and unnecessary delays.

If you have any queries on the points we have raised, please contact me on [REDACTED] or our Policy & Data Officer Murray Root on [REDACTED].

Yours sincerely,

A large black rectangular redaction box covering the signature area.

**Dr Elizabeth Pietrzykowski**  
CEO Private Forests Tasmania