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Threatened Species Strategy
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Threatened Species Strategy

Thank you for the opportunity to provide input to the new draft Threatened Species Strategy. PFT has considered the consultation paper and the draft Strategy and as a general comment we found the papers to be well written and structured. We provide our responses to selected consultation questions in the following paragraphs.

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 2025-28](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

Consultation question - Does the draft Strategy provide a clear and useful framework to guide threatened species conservation in Tasmania?

PFT believes the Strategy provides a sound framework for threatened species management in Tasmania. However, the Strategy is surprisingly silent on the overarching impact a changing climate will have on our biodiversity. Climate change should not simply be considered one amongst many threats, it will be the driver that exacerbates and amplifies all other threats (eg. habitat loss and degradation, invasive species, altered fire regimes etc). Significant changes to the climate are already locked in over the coming decades, so the role climate will play as a threat multiplier means it deserves its own special place at the top of the Strategy so that all the strategic pillars and long term aims that follow can be considered in the context of this. This is particularly the case for the Protect and restore pillar and its long term aims.

In most cases the changing climate will unfortunately have negative consequences for biodiversity, but in some rare circumstances it may provide opportunities, for example, 'habitat' may require a redefinition for some species potentially providing greater flexibility for their management and conservation. Regardless of this, the climate, as a system wide compounding force of change should be named up in any Strategy that envisions 'a future

where Tasmania's species are resilient and thriving, ensuring a legacy of rich biodiversity for generations to come'.

Another omission from the Strategy is any reference to threatened ecological communities, despite the accompanying consultation paper on page 7 saying they are covered within the Protect and restore pillar. How are they covered? Currently, Tasmania lists threatened native vegetation communities under Schedule 3A of the *Nature Conservation Act 2000* and manages the clearance and conversion of these communities under the *Forest Practices Act 1985*. Listing or delisting of these communities is simply done by order of the Minister. There are no published processes or mechanisms, or any community input to any review of the list, nor any clear definitions of threat categories.

The process of reviewing the Threatened Species Strategy provided an opportunity to consider whether this is still the most appropriate way to manage threatened ecological communities, or whether Tasmania should opt into managing these communities using the Common Assessment Method (CAM) approach and potentially bring the management of threatened ecological communities into the *Threatened Species Act 1995*. It would be beneficial to have nationally consistent and transparent mechanisms for listing and delisting both threatened species and threatened ecological communities.

Consultation question - What high-level focus areas should be a priority for our collective effort over the next 5-years? E.g. priority species recovery, threat abatement, decision-support tools, data needs, community partnerships, etc.

Focus area 1 – data and decision support. Tasmania already has sound data management and decision support frameworks in place for threatened species management. These are underpinned by the NVA and TASVEG and supported by the broader LIST Map platform for land and spatial information. These key elements do not need to be completely overhauled or replaced but there is scope for updating and enhancing these existing systems to make them work more efficiently. Such enhancements should at least include the Government acquiring the recently captured statewide high resolution LIDAR data and adopting it for use in vegetation and habitat mapping. This powerful dataset could then be made freely available across government agencies for a myriad of other productive uses.

Focus area 2 – threat abatement validation. Tasmania's forest practices regulatory system contains a range of threat abatement measures that are applied when risks to threatened species are identified during forestry operations. Some of these measures, whilst being legally enforceable and having a significant impact on the economics of forest operations, do not have a strong basis in science. Robust validation of these measures is needed to ensure over regulation does not damage or hinder the relationship between conservation and development. Similarly, validation of the conservation benefits to threatened species of conservation reserves is also required. Too often, conservation reserves are created without any measure of their actual effectiveness in threatened species conservation.

Consultation question - Where do you see the greatest opportunities to improve coordination or reduce duplication across threatened species efforts?

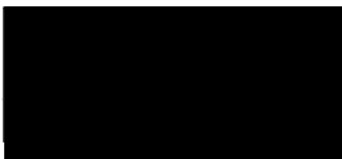
The adoption of the CAM for threatened species is wholly supported as it will provide a more consistent and efficient process for listing species as well as the application of a socio-economic perspective on listings through the public consultation component of the assessment process. Tasmania should move toward full implementation of the CAM for threatened species, and as stated above, consider establishing a similar and parallel process for threatened ecological communities. To reflect a commitment to adopt the CAM it is recommended that long term aim number 2 in Strategic pillar 4 - *Getting the systems right* - be amended by adding the word 'consistent' to that long term aim. PFT suggest it should read - *'The systems and processes supporting threatened species regulation are transparent, consistent, efficient and maintained'*.

Consultation question - Is there anything else you would like to tell us about the draft Strategy?

The current Strategy has been in place for over 25 years and is well overdue for review. To ensure the next Strategy remains contemporary, a mandatory review period should be introduced – perhaps every 10 years.

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

Yours sincerely,



Phillip Bishop

A/CEO Private Forests Tasmania