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National Environmental Standard – Community Engagement

Thank you for the opportunity to provide input into the draft National Environmental Standard for Community Engagement. Private Forests Tasmania (PFT) has read the draft Community Engagement policy paper and corresponding draft legislative instrument and other supporting documents and can provide the following feedback.

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 2026-29, one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry in Tasmania.

The Tasmanian Government has now formally advised the Australian government that it wishes to enter into a bilateral agreement that would seek to accredit the Tasmanian Forest Management System (FMS) under *part 5* of the *Environmental Protection, Biodiversity and Conservation Act 1999* (EPBC Act). Whilst it is not specifically set down in regulations, it is certain the Community Engagement Standard will apply to that accreditation process.

PFT would like to raise the following matters regarding the draft Standard for Community Engagement to your attention.

Recognition of landscape level community engagement and consultation fatigue

Tasmania's Forest Management System comprises three core elements of sustainable forest management:

- A comprehensive, adequate, and representative (CAR) reserve system;
- A policy for maintaining a permanent native forest estate (PNFEP); and
- Independent regulation of forestry and forest practices (Forest Practices System).

Tasmania's Forest Management System is a long-established system that delivers ecologically sustainable forest management across both public and private land. It operates at a landscape (whole of island) scale with an overarching legislative and policy framework and associated planning and operational systems, including processes around engaging with the community and public. It is administered using an adaptive management and continuous improvement approach which incorporates seeking and considering stakeholder engagement, research findings and other feedback processes associated with compliance systems.

It will be important for the Australian Government when assessing Tasmania's application for accreditation, to consider the entire Forest Management System and not just the Forest Practices System – which is the Tasmanian mechanism for managing and regulating actions that potentially impact on forest related matters of national significance, including stakeholder engagement processes.

It is equally important that the Australian Government consider a broader view of application as the current Community Engagement Standard is written in a format and language that is more applicable to individual project by project assessments and decision-making, rather than landscape scale system wide assessments and stakeholder consultation that the Tasmanian Forest Management System facilitates and supports. There is an inherent risk that adoption of specific project by project assessments and development of a large number of engagement plans with consultation periods running concurrently will generate significant consultation fatigue with the potential to unintentionally disengage the community and affected persons.

Affected persons

Tasmania's Forest Management System provides well established engagement opportunities for affected persons currently which somewhat align to the definition of *affected persons* within

the draft Standard. The Standard defines *affected persons* as '*persons that are affected or potentially affected by a proposal because of their geographical proximity to the site of the proposal*'. The Tasmanian Forest Practices System, which makes up the Tasmanian Forest Management System, accounts for decision making about forest operations including harvesting and reforestation by including notification and engagement processes with affected persons prior to commencement of operations. Provided the draft Standard can be recognised at a system level, the level of engagement with *affected persons* should align.

Existing community engagement frameworks under forest management certification

Tasmania's Forest Management System and management of the environment is largely managed by forest managers across both public and private land, and a primary component of undertaking forest harvesting planning and operations to sell timber products is to demonstrate they are sustainably sourced by obtaining and maintaining forest management certification. Forest management certification standards provide forest managers with economic, environmental, social and cultural standards to meet to sustainably manage forests.

In Tasmania, these standards are mostly managed by either Responsible Wood or Forest Stewardship Council (FSC) and are audited and recertified on a regular basis. These include several requirements for forest managers around stakeholder and community engagement. The standards themselves when reviewed are also subject to community feedback and consultation.

For example, the Responsible Wood certification standard *AS/NZS 4708-2021* includes certification principles based on inclusivity and transparency whereby forest managers are required to have inclusive, accessible stakeholder engagement processes. It includes a *stakeholder affected* definition which is similar in nature to the *affected persons* definition under the draft Community Engagement standard. *Section 7.4* of the *AS/NZS 4708-2021* includes extensive, practical requirements for community and stakeholder engagement which mostly aligns with the principles of the draft National Environmental Standard for Community Engagement.

It is positive to see some alignment between the draft Standard and what some forest managers who have certified forests in Tasmania are currently undertaking with community and stakeholder engagement, however it will be important to better understand how the

Standard would complement certification standards, rather than potentially duplicate or complicate engagement processes.

Community engagement and feedback based on ideologies not science

The draft Community Engagement Standard is written and structured in a way that appears to assume community feedback on any activity or project is relevant for consideration, even feedback based on potential or perceived social impacts.

There is a great risk visible from the current draft Standard that it assumes all community feedback should be considered and responded to equally, implying a consistent impact of this feedback on environmental decisions. Currently in practice, much feedback received through engagement processes (and general feedback) about the social impact of forestry and forest sector environmental decision-making in Tasmania is based on ideologies and not scientifically robust.

There needs to be consideration in the draft Standard of how to manage feedback which is based on ideologies to avoid the Standard being used in a manner which could promote lawfare and create roadblocks for forest managers to make appropriate, informed environmental decisions. It would be appreciated if clarity could be given as to how the Standard will look to manage this.

Principles based assessment (clause 7)

PFT supports the addition of the new subsection (new clause 7) in the draft Standard that provides an action or class of actions that satisfies the principles is considered to satisfy the outcomes and the objectives of the Standard - and therefore be consistent with the Standard as a whole. This is a sensible and practical amendment over the first version of the Standard as the more prescriptive principles provide better guidance for proponents as to how their proposals can meet, and therefore achieve, the outcomes and objectives.

Ultimately, Private Forests Tasmania supports the intent of the draft National Environmental Standard for Community Engagement and can appreciate how the objectives of the Standard support meaningful, planned, transparent engagement and cooperation. However, PFT would appreciate further clarity on the matters mentioned above to support effective implementation.

of the Standard whilst upholding the sanctity of the Tasmanian Forest Management System and the level of stakeholder feedback currently sought and considered during environmental decision making processes.

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 0424 601 819.

Yours sincerely,

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

Dr Elizabeth Pietrzykowski
CEO Private Forests Tasmania