

Public comment on the Swift Parrot Interim Planning Guideline (SPIPG)

The following table is a summary of the public comments made to the swift parrot interim planning guideline. The main point of concern have been summarised (see original submissions in file FPA/06/159-06/007 for further detail).

The respondents are acknowledged but not identified. A particular point was often made by multiple respondents. On some occasions not all elements of the point of concern were made by each respondent.

Some additional minor grammatical and formatting comments were also provided in the original submissions. However, these are not included in the current table as they will be addressed in the final edit of the planning guideline.

The order of comments and respondents has no bearing on their relative importance. Acronyms are provided at the end of this document.

COMMENT NUMBER	COMMENT	BY	RESPONSE	RECOMMENDED ACTION
	OVERVIEW			
1	The approach is unduly precautionary	A3	<p>The focus of the FSPG task was on reviewing information and making recommendations for a best practice approach for the species (3 Feb 2009 minutes).</p> <p>Given that the species is listed as endangered under the EPBC Act 1999 and that loss of habitat is listed as a key threatening process under the Swift Parrot Recovery Plan a precautionary approach is warranted.</p> <p>The objective (desired conservation outcome) of the Planning Guideline is to maintain the integrity of breeding-habitat by ensuring that sufficient levels and arrangement of important nesting-habitat and foraging-habitat are retained to support breeding in any given year and, in this way, contribute to the objectives of the National Recovery Plan for the Swift Parrot <i>Lathamus discolor</i> (SPRT 2001). Recommendations in the 2001 Swift Parrot Recovery Plan</p>	No action required

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			<p>(Swift Parrot Recovery Team 2001), emphasise the need to identify and protect key habitats and sites, the implementation of management strategies to protect breeding-habitat, and the maintenance or enhancement of existing habitat.</p> <p>The approach described in the Planning Guideline focuses on prioritising conservation management efforts within Swift Parrot Important Breeding Areas (SPIBAs), while recognising that conservation management actions may also be required outside of SPIBAs within the species' potential breeding-range. It aims to retain and manage breeding-habitat, where the extent and quality of such habitat might otherwise be impacted through forestry activities.</p> <p>It should be noted that the <i>Planning guideline</i> does not deliver all actions considered necessary for the species' recovery. The Recovery Plan identifies other actions to deal with threats other than forestry practices. These are being addressed through the development of a Species Strategic Plan for the Swift Parrot by DPIPWE.</p>	
2	The approach will have significant implications for the timber industry, making many harvest operations impossible and ceasing commercial harvesting of mature eucalypt native forest in most areas within 20 km of the SE and E coasts	A3, A8, A6	We have no evidence that the approach has resulted in significant implications for the timber industry. The feedback from planners is that it now enables them to take the swift parrot into account in the development of an FPP as required under the FPA Act and other associated Threatened species legislation. This is a significant improvement on the delays to the planning process that	The Board request a thorough analysis of the impact of the recommended actions

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		<p>occurred prior to the development of this approach..</p> <p>The planning guideline approach does place constraints in some areas on the harvesting of breeding-habitat. However, in some cases the FPA biodiversity program, in consultation with DPIPWE's Threatened Species Section, has negotiated management outcomes with planners on a case-by-case basis where the full recommendation cannot be meet. However, in all cases the negotiated outcomes still meet the intent of the guideline.</p> <p>A report on implementation of the planning guideline approach has been provided to the Commonwealth as part of the RFA priority species project (see Appendix A). This report provides information that can be used to evaluate the outcome of the approach in relation to forest Practices planning. It shows that since 2009 the FPA has provided advice for the development of 138 FPPs within the swift parrot breed-range. Forty-four of these were within Swift Parrot Important Breeding Areas (SPIBAs) and 94 were outside SPIBAs (Appendix A, figure 1). There have been only six FPPs refused by FPA due to the presence of swift parrot breeding-habitat and the application of actions delivered by the planning guideline. For two of these FPPs a negotiated outcome was reached through the tribunal process which allowed some partial harvesting to take place while retaining habitat for the swift parrot.</p> <p>The planning guideline takes a risk assessment approach and different actions/management constraints are recommended in different areas within the potential breeding-range of the swift parrot. The risk assessment takes into account the importance of a particular area for breeding based on the presence of breeding- habitat,</p>	<p>delivered by the planning guideline on wood production since June 2009.</p> <p>The analysis should include the cost of not implementing this approach to the industry as a whole.</p>
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		<p>proximity to known breeding sites and the landscape context. Appendix B, Figure 1 illustrates the way in which the recommended actions are delivered across the potential breeding range. In most cases > 10km from the coast the actions required can be met through applying the appropriate silvicultural method for the area.</p> <p>It is acknowledged that in some parts of the breeding-range the recommended actions will result in changes to the proposed forestry activity, as with many threatened species recommendations. The objective (desired conservation outcome) of the Planning Guideline is to maintain the integrity of breeding-habitat by ensuring that sufficient levels and arrangement of important nesting-habitat and foraging-habitat are retained to support breeding in any given year and, in this way, contribute to the objectives of the National Recovery Plan for the Swift Parrot <i>Lathamus discolor</i> (SPRT 2001).</p> <p>The technical working group involved in the review and development of the approach included forest practices officers and conservation planners employed by the forest industry. All provided advice and discussions on the impact of strategies being considered. As stated in the planning guideline <i>'The FSPG developed this Planning Guideline based on information made available to them at the time. The attainment of objectives and management actions in this Planning Guideline may be subject to socio-economic constraints affecting the parties involved, and may also be constrained by the need to address other conservation priorities. The management actions may be subject to modification due to changes in knowledge or to improve conservation outcomes on the ground.</i></p> <p><i>The approach expressed in this document represents, in the most part, a consensus view of the FSPG. The FSPG does however</i></p>	
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			<i>comprise members with a diverse range of backgrounds and expertise with divergent views on some key issues.</i>	
3	Difficulties with the approach may mean planners avoid swift parrot areas, concentrating harvesting in other areas, which has implications on coupe dispersal	A3	<p>The suggestion that implementation of this approach is resulting in non-compliance with the coupe dispersal provision of the Code is of concern. The actions delivered by the planning guideline approach, as with other threatened species recommendations, are designed to meet the requirements of the Forest Practices Act and associated Threatened Species legislation. Implementation of the actions recommended for this species does not negate the need to comply with other Code provisions.</p> <p>If there are socio-economic reasons why the recommended action cannot be applied in a particular area then Clause 3.3 of the planning guideline states that <i>'In some circumstances the Forest Practices Authority will exercise its discretion to approve a Forest Practices Plan where it is decided, following consultation with the Threatened Species Section, DPIPWE that alternative actions to those recommended in Appendix D will either meet the objectives of the Planning Guideline or will not substantially detract from the conservation status of the species. Factors that may be taken into account will include the extent to which the loss or modification of habitat may be offset through alternative conservation measures within the immediate range of the affected species.'</i></p>	
4	Conserving existing habitat will not help species	A10,	The recovery plan provides habitat loss as a key driver of	The Board

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	<p><i>recovery</i> (i.e. increase population size). If habitat loss is a key driver of species declines, then habitat creation would be required for species recovery. [If habitat loss is not a driver, then some additional loss may not impact the population.]</p>	<p>A3</p>	<p>species decline. The FSPG, however, identified the need to validate this through research.</p> <p>The role of the approach adopted through the FP system to restore habitat was also discussed by the FSPG. The value of thinning to enhance blue gum flowering in some regrowth areas was debated and is recommended in the planning guideline as an area that needs more work. The value of plantations in providing foraging habitat was considered but harvest rotation times were considered too short. It was considered undesirable for the industry to have plantations perceived as important habitat as this could impact on their availability for harvest in the future.</p> <p>It should be noted that the <i>Planning guideline</i> does not deliver all actions considered necessary for the species' recovery. The Recovery Plan identifies other actions to deal with threats other than forestry practices, including restoration of habitat. These are being addressed through the development of a Species Strategic Plan for the Swift Parrot by DPIPW.</p>	<p>recommends restoration of habitat in some areas to be included in the SSP being developed by DPIPW.</p> <p>Completion of review on the value of thinning in enhancing foraging habitat for the species in some areas.</p>
BACKGROUND				
<p>5</p>	<p>There is inadequate context/info provided on evidence of continued decline. Recent mainland monitoring does not support the claim there is a continued decline. The previously-observed decline in the population may have been due to differences in survey effort, or the effect of the drought years.</p>	<p>A3, A10</p>	<p>The PG was developed on the understanding that the species is listed as endangered and habitat loss is listed as a key threatening process.</p> <p>There is evidence of ongoing habitat loss since the species was listed.</p> <p>Species populations are subject to fluctuations meaning determining trends requires long time periods. It is</p>	

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			acknowledged that other factors may impact on the real or apparent decline of swift parrots. However one or two seasons showing a different trend is considered insufficient evidence to conclude that this species is <i>not</i> in decline. Monitoring carried out by DPIPWE will help to inform the debate regarding species population trends.	
6	There is inadequate context/info provided on a target for preferred population size	A3	Information on the desired minimum population size is currently unavailable. While some theoretical work has been done to estimate a 'general rule' on the number of breeding pairs required (e.g. 500 pairs, Franklin, 1980), more detailed modelling (e.g. PVA) would be required to establish a more robust figure.	
7	There is inadequate context/info provided on the relative importance of mainland threats	A3	In the PG p 12 it states that recurrent drought and habitat loss on the mainland may be the main threatening processes for this species. Clearance for agriculture and residential development has removed most former potential overwintering habitat, including 85% of the box-ironbark forests in Victoria, and over 70% of those in New South Wales (Sivertsen 1993; Traill 1993). Although this clearance may have been the chief cause of earlier population declines, much of the critical box-ironbark forest foraging-habitat on the mainland is now reserved or otherwise unavailable for harvest or clearance. However, due to the fragmented nature of this habitat, the sometimes great distances between suitable foraging sites may still place considerable stress on the species. In Tasmania, the area of breeding-habitat along the south-east coast has been greatly reduced through forest clearance for agricultural, residential and other coastal development over the past two centuries (Swift Parrot Recovery Team 2001). A further estimated 3.6% of	

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			<p>potential breeding-habitat (as defined in FPA 2008) within the breeding-range has been lost since 1996 through conversion of native forests for plantation establishment (FPA 2008). Breeding-habitat is also lost in the short-term by some forms of native forest harvesting, which results in a younger forest age-structure, hence a reduction in hollow-bearing and flowering tree availability.</p> <p>The PG was developed to ameliorate threats in areas covered by the forest practices system (outside of reserves) in Tasmania..</p>	
8	The impact of industry and inadequacy of previous management has not been demonstrated	A8, A2	Habitat loss has been identified by the Recovery Team as a key threatening process (see above).	
9	The PG should provide an analysis and address the question of sufficiency of habitat available. The PG assumes SP conservation relies on retaining all nesting and feeding habitat intact, despite a lack of evidence or references saying habitat is currently limiting. The 09/10 breeding survey data suggests that the entire population successfully bred on South Bruny Island, despite foraging and nesting sources also available on North Bruny that season. South Bruny Island is a SPIBA with 17% (or ~ 4,228 ha) of high and medium nesting habitat, suggesting that this level of nesting habitat within this SPIBA is sufficient to support the swift parrot's population for a given season and raising the question of whether habitat is limiting this species	A3, A8	<p>The PG does not assume SP conservation relies on retaining all nesting and feeding habitat intact. The objective (desired conservation outcome) of the Planning Guideline is to maintain the integrity of breeding-habitat by ensuring that sufficient levels and arrangement of important nesting-habitat and foraging-habitat are retained to support breeding in any given year and, in this way, contribute to the objectives of the National Recovery Plan for the Swift Parrot <i>Lathamus discolor</i> (SPRT 2001).</p> <p>The PG approach recognises that permanent and temporary habitat loss is likely to have greatest impact in areas used for breeding by a large portion of the population and/or repeatedly used by the species. Currently though there are no data to determine when and in what situations nesting-habitat or foraging-habitat become a limiting factor for breeding. In breeding areas</p>	

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		<p>containing extensive tracts of mature eucalypt forest, the local scarcity of hollows is unlikely to be a limiting factor. Rather foraging-habitat would more likely be a limiting factor. Conversely, in breeding areas comprising highly fragmented or disturbed areas, a lack of hollow-bearing trees may limit breeding by precluding Swift Parrots from making optimal use of nearby flowering blue gums, even when these are in ample supply (Voogdt 2006).</p> <p>Recent surveys in Tasmania have demonstrated that in some years the population appears to be reliant on a relatively small proportion of the known breeding range although it may be several years before birds return to a particular site or region. Current evidence suggests this is largely related to unpredictable spatio-temporal patterns in <i>E. globulus</i> and <i>E. ovata</i> flowering. The fundamental implication of this is that in any given year only a small fraction of the breeding-range may be suitable for successful breeding. The loss of Swift Parrot breeding-habitat (specifically foraging and nesting habitat) without a clear understanding of the importance of particular sites presents a significant risk to the Swift Parrot. In years of isolated or localised flowering this may lead to resource bottlenecks, increased intra and/or inter-specific competition and ultimately a decrease in reproductive output. These processes may be further exacerbated by the often disjunct nature of foraging and nesting-habitat, where the loss of one, at a local scale, may decrease or negate the use of the other.</p> <p>The 09/10 breeding survey data does not support the suggestion that the entire population successfully bred on</p>	
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			South Bruny that season. Nest success was not measured. Birds were also found on N.Bruny. See 09/10 survey report on DPIPWE web-site.	
10	It needs to be stated how the Threatened Fauna Manual fits in the operational process (p13)	A2	Agreed	Add the role of other planning tools (eg., NVA, Biodiversity Values Database, Conserve) to this section in the review of the PG
11	It was noted that reference used may be inappropriate for the statement 'A further estimated 3.6% of potential breeding habitat (as defined in FPA 2008) within the breeding range has been lost since 1996 through conversion of native forests for plantation establishment'.	A8	This reference is appropriate. A preliminary analysis of habitat loss was carried out during the development of the planning guideline 2008/1 (FPA 2008).	
12	P14. It was queried whether there was a strategic approach to the management of nesting habitat due to the comment: 'the effectiveness of nest-specific prescriptions to protect nesting habitat relies on knowledge of the location of nests in each year'.	A2	We assume this was an initial comment made when progressing through the document and that the concern was resolved later when it became apparent that managing individual nest sites was only part of the management approach and that the main focus was on potential nesting habitat within SPIBAs.	
	OBJECTIVE			
13	The stated objective of PG fails to adequately address the question of breeding habitat sufficiency and instead adopts a 'no-further breeding habitat	A3, A10	The PG only applies to activities covered by the Tasmanian Forest Practices System. It is part of a broader planning framework for the conservation of the swift parrot across	Clarify objectives and goals in the

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	loss' approach.		Tasmania and the actions it delivers are designed to complement other conservation strategies for the species. The PG does, however, aim for no further loss of priority breeding-habitat (as defined in the PG) particularly in areas identified as important for breeding. See response to comment 13.	revision of the PG and link to overarching objective of the Forest Practices Act
14	The goal of the PG has been downgraded from 'no-net-loss' in the Interim Guideline to 'minimal loss', which is not in keeping with the objectives of the Draft National Recovery Plan for the Swift Parrot (2001) to change the conservation status and improve quality of habitat. Enhancement of breeding habitat cannot be achieved with 'minimal loss' but must increase the quantity and quality of breeding habitat	A5		
15	There is ambiguity of intent with the use of terms like 'regulate' and 'sufficient levels'	A5	Noted	Clarify in revision of PG
16	P17 says a different approach may be considered. If this allows an approach based on greater information and evaluation to override the PG then this should be clarified and stated earlier in the document.	A2	Adaptive management is a well accepted strategy for developing management actions in the face of uncertainty. Alternative approaches may be considered provided the management objective is achieved. Reviews and changes are part of the adaptive management process. While the wording of the comment in question will be reviewed, it is not considered necessary to move this to earlier in the document.	Clarify in revision of PG
17	The objectives of the PG, along with FPA objectives, should be presented in an appendix	A2	The need for such an appendix is considered unnecessary. There is a section for objectives in the PG. The objectives of the FPA and associated legislation were reviewed as part of the FPA Biodiversity Review they are not considered necessary for the current document.	

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STRATEGIC PLANNING				
18	The current approach is not an improvement in strategic planning and does not facilitate strategic long-term planning by the industry	A10, A3, A1	<p>The role of the FSPG was to develop a strategic approach for managing swift parrots. Prior to the development of the planning guideline management actions were developed on a case-by-case basis with little strategic consideration.</p> <p>Existing planning processes were considered during the development of the PG and a number of planning tools have been developed to assist with application of the PG approach during strategic/landscape-scale planning (e.g. Potential Hollow Availability Map and the <i>E. globulus</i> map).</p>	
19	The current approach offers minimal conservation benefit at a huge expense to the industry	A10	<p>Given that habitat loss is identified as a key threatening process for the swift parrot, maintaining high quality habitat is considered to be of conservation benefit.</p> <p>The expense to the industry needs to be quantified. A recent report on the implementation of the PG found that of 138 proposed operations only six have resulted in refusals due to the presence of swift parrot habitat and application of actions delivered by the PG (see Appendix A and B).</p>	
20	A greater emphasis should be put on landscape context and focusing on areas where breeding is known to occur.	A3	An emphasis is put on landscape context, with the establishment of SPIBAs and the use of the 30% context rule. SPIBAs were developed using information including areas where breeding is known to occur.	
21	The current approach involves micromanagement, requiring on-ground assessments with significant implications for silviculture and industry relations. These micromanagement approaches should be removed.	A10, A3	The majority of management actions required for the conservation of threatened species in areas covered by the forest practices system require some on-ground assessments of the presence of habitat. Our current habitat maps and knowledge of species ecology is	

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			insufficient in most cases to rely on desk-top planning alone. A forest planner will always carry out site assessments as part of the development of an FPP.	
22	The use of 30% thresholds effectively mean that each operation can only be managed on a case by case basis which means long-term industry planning cannot be done without an understanding of other land tenure operations in the area. This is further complicated by the requirement to manage this threshold both within the SPIBA and within a 5 km radius.	A1	A potential hollow availability map and context assessment tool has been developed to assist planners.	
23	The emphasis on low-density breeding habitat should be removed when higher quality habitat is being retained.	A3	When there is a substantial amount (30%) of high quality habitat in the area, then low density nesting habitat does not need to be retained. Retention is still required for low density foraging habitat.	
24	Few priorities are established with any real degree of ranking. While there may be a current lack of information to inform prioritisation, attempting to do so using the current information will provide a starting point for an adaptive management process that will improve the decision-making over time. The Wedge-tailed eagle provides a model for prioritisation, where the highest priority is given to proven breeding habitat. Medium priority is given to habitat similar to proven breeding habitat, but without evidenced records. Low priority is given to sub-optimal habitat and no priority is given to habitat without similarity to proven breeding habitat. The prescriptions relate to the priorities	A2	This PG does have a prioritisation process. Firstly greater priority is given to SPIBAs than areas outside SPIBAs. Outside SPIBAs the greatest emphasis is only placed on high density habitat. Within SPIBAS emphasis is placed on high and medium density habitat. When there is substantial mature habitat in the surrounding area, then less emphasis is placed on single tree retention. When there is lesser mature habitat in the surrounding area, then greater emphasis is placed on single tree retention.	

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	without a need for analysis on a coupe-by-coupe basis. (e.g. WTEs: an evidenced nest invokes a reserve, good habitat near to a nest requires a thorough nest search, poorer habitat distant from a nest is a low search priority). The majority of important areas will be captured in this way and it facilitates learning and improvement.			
BREEDING RANGE				
25	The 2010 eastern breeding range is more than double the 2007 known range (which was based on a 10 km buffer to the coast), but despite intensive surveys there is no evidence of any substantial breeding beyond the 2007 range, but this area has big implications for industry.	A3, A6	Traditionally, the Swift Parrot breeding range has been (estimated) or thought to be within 10 km of the coast with most breeding occurring considerably closer. Exceptions to this include an area between Sorrell and Dunalley, and in the Gog Range in the northwest of the state (30 km from the coast) where several Swift Parrot nests were located during the 1990's. As a result of these assumptions Swift Parrot surveys had been focused on these near coastal areas. More recently, however, surveys have been covering a significantly broader geographic area. In addition to highlighting the importance of wet forest habitats, these surveys have often found the species foraging and nesting up to 10 km from the coast and on one occasion over 30 km from the coast at Mt Ponsonby in the southern Midlands. Further reliable reports of nesting exist from places such as Belchers Lookout near Mt Field (approx 40 km from the coast) and the Snowy Range in the Huon Valley (approx 30 km from the coast). These inlands records or reports are still generally associated with either <i>E. globulus</i> or <i>E. ovata</i> . The 10 km 'rule' was primarily developed as guidance for management actions based on available evidence at the time and was not perceived as ecological fact. Our	

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			<p>understanding of the species' breeding ecology has increased considerably over recent years but the relative importance of these inland sites is unclear. Although recent surveys have expanded to include some of these inland areas it still may be several years before we gain a better understanding of their importance due to the unpredictable nature of flowering. Current management practices are trying to adapt to new information as it becomes available while still recognising where there is uncertainty. More generally, the importance of any known or potential habitat into the future needs to be viewed in the context of a changing climate as this is likely to have significant effects on the spatio-temporal flowering patterns of <i>E. globulus</i> and <i>E. ovata</i>. The potential risks associated with inland sites needs to be viewed in the context of the surrounding landscape (e.g. availability and proximity of foraging and nesting habitat). Very small isolated patches are likely to present considerably lower risk.</p>	
26	P23 says the NW range is based on a 20 km buffer. What is the rationale for different buffers in different areas?	A2	The buffer should be 10km. 10km based on estimated foraging range of swift parrot.	Correct in PG
27	Data suggests that nest sites are within 5-9 km of foraging areas. Why is a 10km rule used to define the breeding range?	A4	The foraging range figures provided by Higgins (1999) and Brereton (1997) are based on limited empirical data and are estimates only (Webb, pers. comm.). The use of the 10 km boundary was established at the swift parrot specialist workshop, using all known nesting records, available data and expert opinion.	
SPIBA DEFINITION AND MANAGEMENT				

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28	The increase in size and range of SPIBAs and the breeding range undermine the palatability, practicality and rationality of the current approach.	A10, A3	As stated in the PG, the intent is to modify the size of SPIBAs over time as new information becomes available. If adequate information were available on foraging and nesting areas then they could be made more specific. The area covered by the SPIBAs is based on the criteria provided in the PG.	
29	Why are SPIBAs required? If we can identify and map all <i>E. globulus</i> / <i>E. ovata</i> foraging habitat and then manage the nesting habitat that is in close proximity, this would create a Special Management Zone (SPZ) for the swift parrot. SPZ's would be known and mapped and all other zones outside the SPZ's would be managed under current standard processes. SPZ's would be located on the basis of the evidence from previous surveys:	A4	<p>SPIBAs were developed to help identify and focus management actions in important breeding areas. They could be regarded as SMZs. They allow greater flexibility in management of areas that contain suitable habitat but are outside of SPIBAs. SPIBAs are intended to have flexible boundaries that can be upgraded as new information becomes available.</p> <p>Basing management decisions solely on mapping layers is problematic because current mapping of relevant habitat elements is highly inaccurate in some areas. While efforts have been made to improve the accuracy of mapping layers (e.g. <i>E. globulus</i> mapping), mapping layers are an extremely useful, but generally imperfect tool.</p>	
30	If we were able to identify how many swift parrots per given hectare of flowering <i>E. globulus</i> would carry then we may be able to ascertain how much <i>E. globulus</i> we need in total. The Swift Parrot Recovery Program 01-05 indicates that research was done on flowering patterns of <i>E. globulus</i> in 1993 and 1997. While the results of the research were not located, if obtained and linked with carrying capacity then it may be possible to identify the total number of hectares of <i>E. globulus</i> required to carry the current population of approximately 1000 breeding pairs or to potentially manage the populations on a	A4	If the ecology of <i>E. globulus</i> and swift parrots were more straightforward, then the approach suggested could be considered. However, the swift parrot is a species with an extremely complex ecology. <i>E. globulus</i> flowering is extremely sporadic and unpredictable in time and space (Brad Potts pers. Comm.; Gore and Potts 1995). Swift parrots will aggregate where the peak flowering occurs at the right time in a particular year. This means that we cannot currently make the simple calculation as suggested above, because establishing 'how much' habitat is required to support breeding requires knowledge of the energetic requirements of breeding pairs, how much resource is	

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	more strategic basis.		flowering in a particular location in any given year and a better understanding of nesting requirements. Predicting the occurrence of breeding-habitat required to support breeding in any particular year is not currently possible so we have to base habitat management decisions on past knowledge of breeding/nesting events. Furthermore, with appropriate management we may hope that swift parrot numbers increase in the future.	
31	The term 'SPIBA' is very loosely defined, and the method for selecting SPIBAs is broad and imprecise, particularly the use of the word 'important' on p46.	A8, A2	A subjective approach was taken to the selection of SPIBAs due to the complex ecology of SP. Given that they nest in different areas in different years, breeding records alone cannot be used to identify the key areas. The criteria used in the identification of SPIBAs (p17) clarify why these areas are considered important.	
32	The process for selecting SPIBAs sets the criteria for important areas but duplicates the decision tree.	A2	Different management strategies apply within and outside of SPIBAs. The location of SPIBAs was developed using a variety of information which included, but was not limited to, availability of habitat.	
33	P17 says TSS identified SPIBA boundaries. This is essentially an arbitrary boundary, managed by a bureaucratic process, slow complex and distanced from real life. SPIBAs are not needed if evaluations and prescriptions are targeted and effective	A2	Expert opinion has been used for many other species in the past to assist with management decisions in the absence of quantitative data or published data. The SPIBAs will be adapted as new info becomes available as part of the adaptive management process. SPIBAs enable a strategic/landscape-scale approach to the management of habitat for this species.	
34	The draft guideline should report the area of reserved habitat in SPIBAs and compare that amount, and its geographic spread, to the amount of habitat needed to support an annual breeding event.	A3	Firstly the area of habitat required to support an annual breeding event is uncertain. Secondly the timing and abundance of flowering can vary within SPIBAs. For example, the majority of reservation in the Weilangta SPIBA is in the north. Given the patchiness of <i>E. globulus</i>	

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			flowering , a flowering event in the south may include very little of this reserved area. Table 1 does report on the amount of potential hollow habitat in reserves within SPIBAs.	
35	Different SPIBAs should potentially be prioritised but in a simple way that is adaptable as further knowledge arises	A2, A1	This starts getting into a complex management strategy. Refining SPIBA boundaries to capture the important areas provides a simpler management approach.	
36	In practice there is little difference in the planning for areas inside or outside SPIBAs [comment from planner]	A7	There is little difference in the planning approach but the outcomes /recommended actions applied in operations are different. Appendix B illustrates how the recommended actions are applied across the landscape both within and outside SPIBAs.	
37	There is evidence that almost the entire population was able to nest on South Bruny Island, despite mature forest comprising a relatively low proportion of the island and the SPIBA. Was nesting success remarkably low that year?	A10	The 09/10 breeding survey data does not support the suggestion that the entire population successfully bred on South Bruny that season. Nest success was not measured. Birds were also found on N.Bruny. See 09/10 survey report on DPIPWE web-site. .	
38	The bureaucracy and management complications that will arise through rezoning if new SPIBAs are to be created or existing SPIBAs to be removed, may mean that this is unlikely to occur. Using an 'important breeding zone', comprising a coastal band nested within a more tightly defined eastern potential breeding range, may be a more practical approach.	A10, A3	If SPIBA boundaries are located on a central database (e.g. NVA) then any adjustments made will be available. A process for reviewing SPIBA locations and boundaries could be developed.	
39	Table 1 says the number of nesting records is not taken as an indication of the relative importance of a SPIBA. This needs to be spelt out in the main	A2	All SPIBAs are treated equally when it comes to management decisions.	Consider clarifying this in revision of PG

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	document.			
40	There should be a SPIBA for the Freycinet National Park given that the published DPIPWWE Parks map states that this area is important for SP.	A3	Given the criteria used in the assessment of SPIBAs, the expert panel determined that Freycinet was unlikely to be a key breeding area although it would provide some habitat.	
41	Table 3 and other data suggest that parrots tended towards forest with a 'high' senescence classification. These are the areas where management should be focused. If the foraging resource was mapped adequately it would much easier to then identify suitable nesting habitat (A-C density mature forest >80cm DBH with medium to high senescence) 5-9km of foraging resource then adequate protection may be planned in a more methodical and logical approach rather than the current coupe by coupe basis.	A4	<p>The nest monitoring surveys to date target areas that are most likely to contain suitable habitat. This does not mean that swift parrots will not use other areas. As stated above, swift parrots will use isolated trees. Areas of high senescence are probably heavily used because they contain abundant hollows. The prevalence for swift parrot nests in high senescence areas could be a sampling artefact, or due to higher hollow availability in these areas, rather than a true affect of forest senescence. However, research done in aggregates in Tasmanian wet forest indicates that the mature density of areas is the best predictor of hollow-bearing tree availability, with no improvement in accuracy achieved by incorporating senescence (Koch and Baker in press). Despite this, areas classified as nil senescence are downgraded to low nesting-habitat availability, regardless of mature crown density.</p> <p>Habitat use by swift parrots varies annually and so we cannot be confident that we know the full extent of important breeding areas. Important areas have been defined based on the best information currently available. However, it is possible that additional important areas may still be unknown. An example is the only-recent discovery of the importance of the Southern Forests for providing swift parrot breeding-habitat in some years. Therefore it was determined that some management of habitat is required in areas outside of SPIBAs that lie within the</p>	

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			potential breeding range of the swift parrot.	
42	South Bruny is obviously a hot spot for swift parrots with very low reservation. The most cost effective way of achieving maximum habitat protection is to cease harvesting operations in all areas of public off-reserve forest	A5	The role of the FSPG is not to determine where reserves should be placed, but how to manage habitat within areas covered by the Forest Practices System.	
43	P17, where says 'SPIBAs are areas assumed to be necessary for breeding....' assumptions shouldn't be made in this document	A2	These assumptions are based on the information available, as outlined in the process for identifying SPIBAs. However given the limited knowledge of swift parrot breeding activities, despite more intensive monitoring in recent years, it cannot be demonstrated that these areas are key and so the assumption is made.	
44	The validity of the following sentence was questioned: 'Permanent and temporary habitat loss is likely to have greatest impact in key breeding areas that are used by a large portion of the population and/or repeatedly used by the species'	A2	Habitat loss in SPIBAs is a high risk to the species.	Reword sentence in PG
FORAGING HABITAT				
45	What is the basis for the distinction between a 1 hectare and 5 hectare patch as defined for high density and medium and low density habitat respectively?	A1	Given that high density habitat is considered to be the most important, then extra protection is required for these areas and so a smaller scale is used.	
46	Given that the evidence that Swift Parrots need this foraging resource, funding should be provided to identify and map foraging habitat. Stakeholders should feed foraging resource information into a common map database.	A4	These species can often be found as understorey species, which makes accurately mapping their location difficult. A process has been underway to improve mapping of E. globulus and E. ovata. However, as stated above, mapping layers can be highly inaccurate which could potentially have serious implications for an endangered species with such complex ecology as the swift parrot. We therefore	

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			fully support any contribution by industry to improve information of the distribution of these tree species. Such information could be provided direct to the DPIPWE TasVeg unit.	
47	Consideration should be given to increasing the flowering capacity of the foraging resource. Thinning areas of <i>E. globulus</i> regrowth may increase the crown size of the retained trees and the subsequent flowering events and therefore the food source available to the Swift Parrot. Reducing competition within the regrowth stand is also likely to bring forward the flowering events to an earlier tree age.	A4	This topic was discussed at length by the Fauna Strategic Planning Group. There is concern about thinning <i>E. globulus</i> regrowth as it potentially represents a lowering (at least in the short-term) of habitat quality, there are concerns about monitoring when it would be appropriate to do this, and literature examined to date is not unequivocal about the benefits of thinning on flowering intensity. The FPA intends to conduct a review of this topic in the near future to help inform decisions on the potential of thinning regrowth to improve habitat.	
48	Consideration should be given to conversion of strategically placed current “underperforming areas” to <i>E. globulus</i> plantation. The <i>E. globulus</i> plantation would be managed on a “lifetime basis”, that is the plantation would be commercially thinned over the first 20 years to support <50 <i>E. globulus</i> trees per hectare. This should encourage flowering at as early an age as practical, increase crown size and therefore increase the potential foraging resource. After the retained plantation trees have reached appropriate size for foraging resource then opportunity planting of the underutilized areas (sufficient light, nutrient and moisture) with the retained stems would be undertaken to provide a future foraging resource. Once these trees reached a suitable size for foraging resource then consideration would be given to removal of some or	A4	While we support creative thinking of how to improve habitat for swift parrots, plantations as they are currently managed do not reach an age or a growth form that provides a foraging resource for swift parrots. While it is possible that plantations could be managed as outlined above, this would seem to decrease the production advantages that are achieved by plantation forestry compared to native forestry. Although the strategy outlined above could be done in the future if the industry was willing. However, different races of <i>E. globulus</i> flower at different times (Gore and Potts 1995). The main national breeding program is dominated by selections from mainland races of <i>E. globulus</i> (Jones et al 2006). Seed stock for blue gum plantations in Tasmania come from a variety of areas, with much of the seed coming from Flinders Island and Victoria, although some will also come from Tasmania (D. Williams pers. Comm.). It is possible to use	

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	all of the mature plantation trees. The process would then be repeated so that a permanent foraging resource remained available. Whilst being a little abstract, it may be a commercial way of increasing foraging resource and provide a potentially positive contribution to the current foraging resource.		local seed for plantations in Tasmania if promoting swift parrot habitat. The Tasmanian strain is a variety that has particularly large flowers and capsules (Jordan <i>et al.</i> , 1993). The really large old <i>E. globulus</i> trees that can be found in native forest can produce high amounts of nectar for swift parrot feeding. These areas are also more likely to contain a nesting resource as well as a foraging resource.	
49	The [definition?] for <i>E. globulus</i> foraging is generally ok except for trees with a diameter of 40 cm in 1967 regeneration – it is very difficult to apply this especially as no number per HA is quoted.	A7	Comment acknowledged.	
50	The SPRP identified stakeholders to increase potential foraging resource. What has been achieved and where are the results. How are the rest of the community and government contributing? What programs are being implemented to encourage retention of foraging and nesting habitat on private land? What encouragement is being offered to increase the potential swift parrot habitat on private lands?	A4	As outlined above, the current interim planning guideline only covers activities regulated under the Forest Practices System, and a more comprehensive species strategy plan is currently being development by DPIPWE. The interim planning guideline was developed with the intention of being used on both public and private land and requires similar habitat retention actions on both land tenures.	
	NESTING HABITAT			
51	Prioritisation of nesting habitat on p24 is good	A2		
52	F density is less than 5% mature crown cover and so does not meet the definition of low density nesting habitat in Table C pg 37 and should not be considered.	A1, A7, A6	Agreed	Remove F density from table.
53	How does the PI-type ‘overmature’ relate to the classification of nesting habitat?	A2	Areas were classified as ‘overmature’ at some points during the PI-typing process. This is an outdated classification. Consequently, hollows are found in forest	

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			not classified as overmature and so no regard was paid to this PType classification.	
DECISION TREE – CONTEXT ASSESSMENT				
54	The context assessment requires a GIS decision-support tool to be made available.	A10, A1	The Potential Hollow Availability Map has been developed by the FPA. An online tool to help use this map will be made available to planners in the future via the fPA Biodiversity Values Database. In addition, this map may be distributed, under license agreements, to key stakeholders for use in their own systems. The foraging habitat map produced by DPIPWE is also available as a planning tool	
55	Why is a radius used for the coupe context instead of a buffer around the operational area? This process seems to take in no account of the size and silviculture of the operation.	A1	A radius is used because the strategy aims to ensure suitable nesting habitat is retained throughout the area.	Reword PG Seek shapefiles for coupe boundaries
56	Do the context questions consider the state of the landbase prior to the inclusion of the operation area or should these include the operational area?	A1	The context questions include the operational area.	Make this clearer in PG.
57	The meaning of the area within a 5 km radius is not clear, whether it refers to the area within 5km of a SPIBA, of a known nest, of a stand of high density nesting habitat or of the centre of a proposed coupe.	A5	It refers to the centre of the proposed operation. This will be clarified in the revised PG	Clarify in PG
58	Footnote 6 purports to explain why a 5 km radius is chosen to assess the % of area comprising high/medium-density nesting habitat, but it doesn't do so.	A10	This is correct. The reference to footnote 6 will be removed from the box leading to Rec 3. Inserting a footnote on the use of the 5km radius will be considered.	Correct in PG

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59	Two possible scenarios for nesting habitat within the eastern breeding range are specified (p 42). (1) In operation areas where the SPIBA or the area within 5km radius has <30% high and medium density nesting-habitat (>20% mature eucalypt crown cover and senescent trees). (2) In operation areas where the SPIBA and the area within 5km radius has >30% high and medium density nesting-habitat (>20% mature eucalypt crown cover and senescent trees). This appear to be restrictive; the use of ‘and’ and ‘or’ in these scenarios could very well be interchanged in practice, and could therefore lead to different management requirements and outcomes	A5	This appendix is outlining the results of the decision tree. We assume this comment is stating that higher restrictions should be made when both the SPIBA and immediate area have <30% high and medium density nesting habitat. If you swapped them then this would result in substantially higher rates of habitat loss and so would not meet the objective of the PG	No
60	Why is there no context question for operational area within 10 km of the coast, SPIBA or breeding record? Recommendation 5 appears to require tighter management of nesting habitat than operations that are within 10 km of the coast, SPIBA or breeding record.	A1	This will be clarified in the revised PG. Rec 5 applies to low risk areas (see Appendix B) and actions (if any) will be advised on a case by case basis.	Clarify in revised PG
61	There is inconsistency between recommendations. First, the required retention of ‘all nesting trees in an areas of low density habitat’ (Rec 1) is more restrictive/specific where the 30% threshold is not reached/unknown, than when this threshold is known to be reached (R2). What is the reason for NOT retaining nesting trees in low density habitat in areas where there is known higher density habitat? Swift parrots will use nesting trees in areas of both densities.	A5	Areas leading to in Rec 1 are assumed to have less nesting habitat in the surrounding area than areas referred to in Rec 2. Consequently suitable nesting trees found in low density nesting habitat are also required to be retained given the lower availability in the surrounding area. In areas where there is more potential nesting habitat in the surrounding area, then the assumption is made that this should cater for the nesting requirements of SP	
62	The Planning Guideline’s decision-tree hierarchy proffers unnecessary complexity. The number of levels and subdivisions in the decision-tree hierarchy should be reduced. The ‘strategic’, higher-level decision-making is currently split among three levels: the eastern potential breeding range;	A10	See response above on the reasons SPIBAs are used to prioritise actions. Appendix B illustrates the way in which actions are delivered across the	

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	the SPIBA (swift parrot important breeding area); and the 5-km-radius coupe-context. I think we could make do with two levels, not three. I like the idea of a coupe-context level in the decision-tree's hierarchy – in fact I think it's the most relevant and strategic-thinking innovation the FSPG came up with – but I don't think it sits comfortably in the current hierarchy of interventions under the current approach.		landscape.	
63	In the box in Figure A page 40 that reads 'Does more than 30% of the SPIBA comprise high/medium density nesting habitat', the words that follow are wrong. At this point the reader should be referred to Table 1, or the SPIBAs listed, which would be easier.	A8	Table C p37 outlines how high and medium density areas are identified. Table 1 in the main document outlines SPIBA names and locations and could potentially be referred to as well.	Address in revision of PG
DECISION TREE – NEST SITE MANAGEMENT				
64	The query asking whether swift parrots have been seen or heard between October and February 'this year' is ambiguous, because the period October to February spans two calendar years.	A10	Wording will be changed to state 'current breeding season'	Change PG to state 'current breeding season'
65	The phrase 'known nest site within 500 m' is ambiguous, because it doesn't clarify if it means 'current' or 'historical' nest sites, or both.	A10, A5	A reference to the NVA database will be made in the revised version	Refer to NVA in revised version
66	For Question five, what is meant by 'the current coupe'? Is it the one being planned (and therefore is not current) or is it for current coupes in the area?	A1	The wording will be revised to state 'planned coupe'	State planned coupe in revised version.
67	500m retention around nest sites is inadequate given the distance birds can travel between nesting and foraging areas and the level of habitat loss already occurred. Further loss will make the impact of any natural disaster	A9	Retention around nesting sites is required to ensure that areas known to be important for SP nesting are retained.	No

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	like bushfire more devastating on the parrot.		However, the inadequacy of the data on nest site locations, and the complex ecology of the SP, means that managing only known nest sites is inadequate so a more landscape-scale approach to habitat retention is taken.	
68	What kind of operations are meant in Note 2? If roading operations are meant then should in this statement ought to be replaced by will. The intent and meaning of this section of Note 2 needs to be clarified and made consistent.	A5	This means all operations relating to harvesting and so does include roading. Roading operations are not expected to be more detrimental to SP than harvesting and so this should not change the choice of term used. However this note will be reviewed to see if clarity can be improved.	Consider in revision
69	With regards to Note 2, By whom, how and with what authority are these observations of swift parrots made, and what is their impact? Members of the public could be trained, and authorised, to report swift parrot sightings within and adjacent to operational coupes, so that the provisions of Note 2 could be more widely and frequently fulfilled. The result of these observations needs to be more clearly specified.	A5	This document is intended for managers, planners and practitioners of forestry operations. Therefore this comment is primarily directed towards these people. However, any member of the public can inform FPA/DPIPWE of swift parrot sightings and add them to the NVA. The results will be used to target swift parrot surveys conducted by DPIPWE, which will help assess the areas used by SP. The wording of Note 2 will be reviewed.	Consider in revision
70	In the past, harvesting operations were not stopped after sightings of SP and nests in the vicinity.	A5	The example provided was prior to the implementation of the current PG.	
DECISION TREE – SINGLE TREE RETENTION				
71	Retention of single trees is bureaucratic, pedantic (when considering patch retention), excessive, ineffective in the long term (due to lack of	A10	The PG approach aims for patch retention rather than single-tree retention. In the trialling of the interim PG approach the	

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	recruitment).		recommended actions have been incorporated into the silvicultural prescription for the particular operation area in a number of cases.	
72	Retention of single trees can have significant safety implications for industry personnel.	A10, A3, A4, A6, A7, A8	It is acknowledged that there may be some safety hazards associated with retaining single trees in some circumstances. This is why the reference to single-tree retention has been worded carefully, allowing some flexibility in implementation depending on the silvicultural prescription and other operational reasons. Additional explanatory notes provided in the interim planning guideline, make it clear that it is understood that some nest and foraging trees will be lost (up to 10%). Training days will be run for those using the planning guideline to ensure that the desired outcomes and degree of flexibility is understood by all involved. Single nest-tree retention is focussed in areas that are predicted to have limited hollow availability at the landscape scale (according to currently-available mapping layers and ground-truthing) and where it can be applied with the silvicultural prescription for the site..	
73	Retention of single trees is not operationally feasible or very challenging to achieve in wet forests (particularly for cable operations), and affects commercial viability.	A10, A3, A4,	As outlined above, there is some flexibility on single tree retention in terms that when it is not possible to retain trees,	

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		A8	<p>they can be removed. However, the intent of the interim planning guideline should be clear in that planning should consider management of key habitat trees and retain them whenever required and practicable. Training courses will be run if the interim planning guideline is released to ensure that it is interpreted correctly, including the intent of the guideline, and areas where there is flexibility (such as when single trees can be removed). Where planning operations cannot meet the intent of the swift parrot interim planning guideline, alternative approaches are considered. However, it should be noted that in some areas where the removal of habitat poses a high risk for the birds, and habitat cannot be retained due to the silvicultural prescription required, harvesting may not be possible.</p>	
74	<p>Data strongly suggests that A-C mature forests with medium to high senescent trees of DBH>80 cm hold most or all of the nests. There is no empirical data from SP reports to indicate that single trees within an area would serve any useful purpose for swift parrot nesting.</p>	A4	<p>Current evidence indicates that swift parrots primarily nest in areas containing abundant mature forest habitat. Consequently the swift parrot interim planning guideline focuses primarily on retaining areas of PI-type A, B or C density. The interim planning guideline focuses on retaining intact habitat where abundant habitat is available, with a 30% threshold generally being used (30% is based on published information on potential thresholds of habitat loss).</p>	

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			<p>Where habitat availability does not meet this threshold, a greater emphasis is placed on management of single trees. There have been a number of records of swift parrots nesting in single trees, including trees retained in harvesting operations (Webb, pers. Comm.). The retention of single trees is therefore an appropriate management strategy because these trees can be used by swift parrots, while still allowing harvesting operations to occur.</p> <p>Our knowledge of swift parrot ecology is increasing slowly, and current data shows that some swift parrots will nest in single retained trees. It is unknown whether the apparent aggregation of nests is a result of preference by the birds, or of habitat availability.</p>	
75	In practice, some nesting-trees or foraging-trees would end up being retained at harvest anyway through general Forest Practices Code provisions.	A10	This is true in some cases, but not necessarily at a sufficient rate to ensure adequate habitat for swift parrots	No
76	Instead of retaining 'all nesting trees' or 'all foraging trees' consider allowing retention of 50% (or some fixed rate) of the habitat in patches rather than individual trees, to ensure safe and operationally feasible forest practices, as well as breeding habitat recruitment through the inclusion of some younger trees in the retained area. And to prevent excessive effort on single trees for minimal gain.	A3, A7	The PG approach does emphasise retention of habitat as patches rather than as single trees.	
77	The stated key nesting tree is very open to both conjecture by what constricts a good nesting tree and other peoples interpretation.	A7	Identification of key nesting trees is based on diameter and differs between wet and	No

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			dry forest (Table A). This method for identifying nesting trees was selected specifically to remove subjectivity and difficulties with identifying hollows suitable for SP nesting.	
78	Getting specialists to inspect a small number of mature trees that need to be removed is a waste of time and resources. A form should be developed to assess the trees that can't be retained, the reasons for this, a description of the tree and verification by an FPO is required.	A7	This is a good idea and will be taken into account in the revision of the PG.	Consider in revision of PG
79	A coupe on Bruny island was identified as having two isolated <i>E. globulus</i> trees in the centre of the harvested area. The Risk Management analysis (Appendix G, Table A) identifies this as a risk (#5) and the mitigation/ monitoring response as 'Maintain buffer trees between habitat trees and harvest activities', which has not been done. The associated risk of tree loss has been incurred.	A5	Comment noted	No
80	Rec 5. The advice to 'retain foraging-trees and nesting-trees' should presumably read 'retain all foraging-trees and nesting-trees' (i.e., not just some of them).	A10	Rec 5 applies to low risk areas. The requirement for actions in these areas will be assessed on a case by case basis.	
DECISION TREE – OTHER				
81	No evidence or data is proffered as the basis for the decisions built into the decision tree.	A8	The rationale/basis for the decisions is provided in the body of the PG. The footnotes to the decision tree provide a justification of the thresholds used. If this comment refers to the general approach, then the entire document is working towards justifying this approach. The document will be reviewed to ensure that the rationale is clear.	Consider in revision
82	Evaluation criteria: eight decision-making steps need to be trawled through	A2	While there are numerous steps to walk	No

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	in the Decision Tree before the habitat on the coupe is even considered, and some of these steps require sophisticated GIS analysis or poorly-available data (eg. Hollows mapping, senescence data). Training alone will not eliminate the implementation risks associated with a complex process, but simplifying it can make it both easier to implement and easier to monitor/improve.		through, if the steps are clearly stated then it does not make the decision tree complicated or unwieldy to use. Planners and advisers have already used the decision-making approach adequately (see Appendix A) The decision tree approach will be incorporated into the decision support system used by forest planners (TFA).	
83	The decision-tree contains ambiguous wording, dead ends or points of indecision. For instance, 'notify the FPA' is presumably not envisaged as an end-point. I imagine the wording ought to read something like 'notify the FPA; cease forestry activities; await FPA advice'. Likewise 'seek further advice from the FPA' presumably should read the same as the previous example. It begs the question as to whether the FPA would want to be notified on so many counts.	A10	The degree to which this leads to notifications to the FPA will be monitored and the decision tree adapted when appropriate management for recurring scenarios is established through the Agreed Procedures	
84	More specificity is needed on the comment about the need for case-by-case decisions (p27)	A2	Advice on FPPs is frequently provided on a case-by-case basis by FPA, after consultation with DPIPWE as part of the Agreed Procedures. Forest planners who believe special circumstances may apply to the coupe being planned can request special advice. The wording of the PG will be revised in light of this comment	Consider in revision
85	Footnote 6 doesn't explain why recommendation 5 applies if one is within 10 km of the coast (or a SPIBA for that matter); it only explains why it applies if one is within 10 km of a breeding record.	A10	10km from the coast, but outside SPIBA, relates to the area where next highest likelihood of breeding event.	Clarify in footnote 6
86	There are no yes/no labels for the third decision down in the decision-tree	A10,	To be adjusted	Adjust in

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		A8		revision
87	There are no reference to 'will' or 'should' clauses in the decision-tree, despite these being discussed in previous pages.	A10		Consider in revision
88	The focus on patch retention will mean the habitat retained will primarily be dense stands, which is not the usual habitat for swift parrots.	A9	This is not the case. Habitat quality is determined by the density of mature crowns, not the density of stems.	No
89	The phrase 'at least 1 ha in size' is used in several places, but is usually superfluous. For a start, 'ha' already implies 'in size'. And this criterion is already stated in Table B as the means of defining high-density foraging-habitat.	A10	While this is correct, the inclusion of these words in the decision tree can only increase clarity when using it for planning and so they are retained	No
90	What is the relevance of % occupancy data for hollows in coming up with a similar % area threshold – they're very different concepts.	A10, A8	This information highlights that not all hollow-bearing trees will contain habitat suitable for use by fauna.	
91	Footnote 7 refers to Appendix I, which does not exist in this document.	A10	Appendix I does exist in the document so potentially an earlier version was used in this comment?	No
92	The decision tree (Appendix D and E) should be part of the main document	A2	Not agreed	
93	What evidence is there for patches improving availability of lerps?	A2	Agreed misleading wording	Reword on P27
94	The use of offsets to encourage voluntary protection of breeding habitat should be considered	A3	While offsets are a practical management solution in many circumstances, issues with the concept of offsets are that they still facilitate loss of current habitat, the gains do not always counter the losses, there can be a time lag between loss and gain and there is often poor implementation and monitoring (Gibbons	No

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			and Lindenmayer, 2007; Burgin, 2008)..	
95	Suggestions to offset areas from previous planning issues in the area and immediate range the TSS don't always recognize and take this account ie steep areas and major areas excluded from harvesting due to other values that contain nesting trees.	A6	Areas excluded for other reasons can, but do not always, provide good nesting habitat (i.e. abundant hollow-bearing trees)	No
96	Q3 of the decision tree, regarding management of plantation 'where no native vegetation' does not make sense.	A1	Adjust wording to state "with no native vegetation remnants"	Adjust in PG
97	There are so many versions now when coupes are audited they are often viewed against current SP interim prescriptions not the one at the time of the special values & certification of the FPP.	A7	The SP PG is still under development and so should not be currently used when auditing coupes. The management prescriptions applied in the FPP should be audited and whether or not the correct planning procedures were followed in obtaining advice on the recommended action from FPA/DPIPWE.	No
	MONITORING			
98	The monitoring programs outlined seem difficult and inconsequential.	A10	The monitoring programs outlined were developed to highlight areas of research/monitoring that require work. The programmes will be refined and developed further before implementation	No (in the immediate)
99	A monitoring program is required to assess land managers' experiences of attempting to implement the <i>Planning Guideline</i> . A report on this assessment should be provided within a specified timeframe with a view to feeding into improvements to the planning process.	A10	See Appendix A. An implementation monitoring study is being conducted by FPA Compliance section.	
100	How will the FPA annually estimate, through assessing a random selection of Forest Practices Plans, 'the number of habitat trees expected to be lost' and 'number of habitat trees lost (compared with planned number lost)' as a result of implementing the <i>Planning Guideline</i> ? And why would it want	A10	This monitoring program was developed in the initial stages of the project and has been found to be impractical. It can be	Remove from PG

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	to, if the <i>Planning Guideline</i> offered a truly strategic approach to conservation?		removed from the revised PG.	
101	Why is the <i>Planning Guideline</i> so concerned about researching or monitoring the ' <i>long-term survival of habitat-trees</i> ' rather than the long-term ability of forest (retained or otherwise) to continually generate habitat-trees?	A10	Because if trees retained do not survive into the long term then the contribution they make to swift parrot conservation is limited. This information can be used to review the current approach.	
102	On page 29 it is explained why it has been so hard to get reliable data about swift parrots. The research proposal on page 48 is likely to flounder for the same reasons.	A8	If referring to the project 'Partial Harvest – other effects', this study could only be run opportunistically if suitable locations were found within the area used by the swift parrots in a particular breeding season.	No
103	The proposed method to monitor ' <i>overall habitat availability</i> ' focuses only on loss of habitat trees and not on creation of habitat trees.	A10	Tree hollows take long periods of time to form, possibly more than 200 years. Therefore the creation of habitat trees is considered to be negligible in the immediate future	No
IMPLICATIONS ON OTHER FOREST PRACTICES REQUIREMENTS				
104	The potential impact of this planning guideline on silvicultural options (e.g. clearfall operations) will have implications on fire, and subsequently smoke management.	A3, A8, A6	New silviculture techniques are emerging which are using modified burn regimes (e.g. aggregated retention). This type of silviculture could be used to implement the PG. It is understood that single tree retention is difficult to achieve in wet forests. There is frequently a low diversity of age structures in wet forest and so it is expected that aggregated retention could be used to capture the majority of nesting trees and that the levels of loss could be	No

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			done within the allowance made in the PG	
105	The reduction in mature forest harvesting will have implications on local seed sourcing and possibly seed shortages	A3	Discussions will be had between FPA and industry to discuss the degree to which issues with seed sourcing are occurring, and possible ways of addressing this.	
	PROCESS			
106	Where and how is a review of the PG occurring?	A2, A1	The current PG will be reviewed following a decision by the Board of the FPA and Secretary of DPIPWE. If and when the PG is endorsed, then a time frame for reporting of monitoring and for reviewing the PG can be specified.	
107	When do ' <i>interim management prescriptions</i> ' under the agreed procedures become anything other than interim (summary, page 6)?	A10	When the approach is endorsed by the Board of the FPA and Secretary of DPIPWE.	
108	An independent scientific review of the draft guideline should be done. This should include an assessment of the likelihood of there being sufficient breeding habitat (including its reservation status) across the eastern breeding range to support the swift parrot population and a relative risk assessment of confining habitat prescriptions to the 2007 known range boundary.	A3, A10	This review was carried out as part of the development of the PG by a group of scientists and practitioners. Further review and comment has been sought from the TTSAC and FPAC. The response/advice received from TSSAC is attached (Appendix C). This review process is the standard procedure and is expected to highlight any concerns and flaws with the current approach.	No
109	A transparent technical review of public comments submitted to the FPA should be conducted in consultation with stakeholders.	A3	This current document forms part of the review of public comments.	
110	Socio-economic factors needs to be taken into consideration	A3	This is the role of FPAC, who will receive the PG and this document detailing public	Board to request

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			<p>comments.</p> <p>It is expected that a full socio-economic analysis will be provided to the Board and the Secretary of DPIPW to assist them with their final decision.</p>	<p>advice on socio-economic impact from FPAC</p>
111	<p>Training of FPOs and harvest operators of implementation of the guideline needs to be done</p>	A5	<p>This is correct. The PG states that training will be required before implementation (e.g. Figure 1) and training is part of standard practice when releasing a new management tool.</p>	
112	<p>Inadequate consideration was given to alternative approaches. An alternative approach was put to the FSPG but dismissed, partly it would seem on the basis that 'thinning has not been demonstrated to improve the habitat value of a stand', and partly because of a lack of clarity about some of the terms used. These concerns could potentially be addressed and/or apply to the current PG. Presentation of the 'alternative approach' has been significantly reduced to a single page and is painted in a somewhat negative light, making it easy for outsiders to dismiss. The alternative approach should be considered as 'Approach B', with equal status in the <i>Planning Guideline</i> to that of 'Approach A' (the current approach), so that both approaches could be considered by FPAC and TSSAC.</p>	A10, A8	<p>This is not accepted.</p> <p>A number of alternative ways of approaching the problem were put forward during the process. File fpa/06/159 has all these and documents detailing the deliberations of the FSPG. These documents are available for consideration. The alternative approach in question was provided in the PG in Appendix H as a series of key summary points. The FSPG members considered this approach and decided to incorporate some elements into the final draft planning guideline. All members or delegates had the opportunity to comment on Appendix H.</p> <p>A complete version of the draft alternative approach was not provided because the majority of the working</p>	

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			<p>group agreed to summarising the approach in the appendices. In addition, the document would have been very lengthy if all the alternatives considered by FSPG members were included as appendices. Finally the complete Word version of the 'alternative approach' was not available at the time of completion of the latest draft.</p> <p>The attached response from the Chair of the swift parrot Recovery Team provides support for a single approach (see Appendix C).</p> <p>The FP system does, however, allow for alternative approaches to meet the objectives for particular species to be considered by the Board. These may be submitted to FPA/DPIPWE for consideration via the Agreed Procedures. FT's Huon District strategic plan is an example. This used a different rule-set to the one proposed in the current planning guideline with the aim of meeting a similar objective. It was approved by DPIPWE and FPA.</p>	
113	The alternative approach should be given an independent scientific review and compared to the current approach, and should be made available in entirety to FPAC and TSSAC. The independent reviewer should report on the relative strengths and weaknesses of the two approaches, with the FPA deciding on a way forward only after considering the reviewer's comments.	A10	The FP system does allow for alternative approaches to meet the objectives for particular species to be considered by the Board. These may be submitted to FPA/DPIPWE for consideration via the Agreed Procedures.	

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			The current draft planning guideline has received an independent scientific review by the Tasmanian Threatened Species Scientific Advisory Committee (see Appendix D).	
	OTHER			
114	The FPA 2008 URL was not available for public access	A8, A10	We apologise for this and will endeavour to make it available in the near future.	Yes
115	Does 'population number' signify the number of individuals in a population, or the number of populations? Alternative terminology may be 'population' or 'population size'.	A10	Change terminology to population size	Yes
116	Table 1 says estimates of land area 'do not include large industrial landowners'. It is unclear what this means and why this data was not included.	A2	Data was not available at the time the table was constructed. The data in this table will be reviewed, or this point will be made clearer	yes
117	The Planning Guidelines suggest to me that the two most important things we could do for the swift parrot are to plant blue gums on cleared land, and control starling numbers.	A8	These activities are beyond the scope of the current PG which only caters for areas covered by the Forest Practices System. The recovery plan being developed by TSS will take a broader approach to species conservation and recovery.	No
118	Currency of data in terms of efficient and verified input of data is required to ensure this process works. Land managers need to be assured that data particularly nesting and breeding records are verified and entered in a timely manner such that information is correct at the time of operational planning.	A1	This is correct. The NVA database is being reviewed and the revised version should facilitate timely incorporation of breeding records. Changes to the hollow availability map will occur on an approximate annual basis as data is made available.	

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119	There are significant other factors contributing to swift parrot mortality, including collisions. What effort is being made to address other threats to swift parrots?	A4	The PG was only ever to be applied to areas covered by the Forest Practices System. TSS are currently starting to develop a more holistic and comprehensive management strategy for SP. However, habitat management is expected to be a critical element of any management strategy.	
120	On page 27 the report claims that 'the decision tree is a consensus view' which, despite qualification, is wrong and should be withdrawn.	A8	<p>The guideline clearly states that the Technical Working group (FSPG) consisted of members with divergent views on some issues, but that, in the most part, the approach represents a consensus view (top of page 3). Points of agreement and points of disagreement were documented at the final meeting of the group. These have been provided to the Chair of the Forest Practices Board and Secretary of DPIPWE</p> <p>Under the Agreed Procedures it is the role of FPA and DPIPWE to develop management approaches for threatened species in areas covered by the FPsystem. The two organisations have done this and the Technical Working Group (FSPG) informed the process. This is the current 'consensus' view of the two organisations (DPIPWE and FPA) responsible for the development of the management approach.</p> <p>The next step in the process is for the FPB</p>	

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			and Secretary of DPIPW to consider all public comment, advice from FPAC and TSSAC.	
	PLANNING GUIDELINE STRUCTURE			
121	Move the last paragraph (P14) to three paragraphs earlier as an evaluating comment on the existing system	A2	This will be considered in the revision of the PG	Maybe
122	Links between recurring definitions or concepts are poorly made: a definition should be made once early on in the appropriate part of the main text, then subsequently referred back to.	A2	This will be considered in the revision of the PG	Maybe
123	References are not included at certain times (e.g. mature forest should refer to Jacobs 1955), and at others are made but the details are inaccurate or do not appear in the References list (eg. TSPA 1996 Part 2a, Voogdt 2006).	A2	These points will be considered in the revision of the PG	Maybe
124	The document should start with the big picture and then step down to the operational detail. Start with nesting and foraging habitat, then go to potential breeding range, then to SPIBAs.	A2	This will be considered in the revision of the PG	Maybe
125	If nesting and foraging habitat (also unnecessarily known as “breeding habitat”) is defined as part of Background (section 1.3 in draft), then it doesn’t need to be repeated under the Management Approach (section 3.1.3 in draft).	A2	This will be considered in the revision of the PG	Maybe
126	The structure and process of this document needs to be simple and so the link between conservation information and production outcomes – essentially the risk management step – needs to be as concise as possible. E.g.: The basic inputs into habitat evaluation are swifty presence records, nesting habitat data and foraging habitat data. The basic outputs should be outcome-based goals that can be achieved in conjunction with most sorts of forest operation. The risk management step(s) between these	A2	Experience suggests that ‘outcome based goals’ generally cause planners and managers to seek prescriptive guidelines to help them achieve the desired outcomes. See letter from Chair of the Recovery Team (Appendix C). Given that, this PG is reasonably prescriptive in what needs to be retained, but some flexibility	Consider reviewing Appendix G of PG

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	<p>should be specifically described within the main text of the document together with their rationale, supporting evidence and techniques to evaluate their success. Any analysis required to support that risk management should be completed within this Planning Guideline, and the conclusions of that analysis (eg. Particular benchmarks in habitat density that assist prioritisation) included in the risk management step(s).</p> <p>The 'adaptive management process' seems to be described twice in Figure 1 and Appendix B, but both are vague and difficult to understand or relate to the actual process and tools utilised in FPA's operation.</p>		<p>is allowed in how this is achieved.</p> <p>A risk assessment is provided in Appendix G of the PG and is therefore available for all interested users. Possibly the rationale for some of the steps may be unclear. The PG will be reviewed taking this into consideration.</p>	
127	<p>The 'adaptive management process' seems to be described twice in Figure 1 and Appendix B, but both are vague and difficult to understand or relate to the actual process and tools utilised in FPA's operation.</p>	A2	<p>The presentations of the adaptive management approach will be reviewed.</p>	<p>Consider revising</p>
128	<p>Simplify, use dot points. Particularly in section 2, aims and objectives. Some info could go in appendices</p>	A2	<p>The use of subheadings in the Aims and Objectives section will be considered</p>	<p>Consider revising</p>
129	<p>Move section on Nesting and Foraging (3.1.3) before Potential breeding range (3.1.2), before SPIBAS (3.1.1)</p>	A2	<p>This will be considered in the revision of the PG</p>	<p>Consider revising</p>
130	<p>Re-title section 3.1.3 to be 'Nesting and foraging' and section 3.1.2 to be "Potential Breeding-range)</p>	A2	<p>These adjustments will be made</p>	<p>Re-title section 3.1.3 to be 'Nesting and foraging' and section 3.1.2 to be "Potential Breeding-range)</p>
131	<p>Any concept of fundamental importance to the purpose of this document should be included in its main text, rather than as a footnote or appendix</p>	A2	<p>Noted</p>	<p>Consider in review</p>

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	(e.g. The importance of high-altitude <i>E. globulus</i> for extending the foraging season, the decision tree).			
	GRAMMAR AND FORMATTING - GENERAL			
132	The header to the report claims that it is confidential, yet it is clearly not so as it is being released publicly.	A10	Header to be removed in revision	yes
133	P12. Is the distribution of <i>E. globulus</i> flowering patchy or irregular?	A2	It is patchy in terms that it will be concentrated in particular areas in any one year, but that we cannot currently predict where this will occur.	No
134	P12. 2001 figures for population size are not current	A2	It will be reviewed as to whether more current figures are available.	Consider in review
135	Hyphens are not required between words used as a particular term for the purpose of this document (e.g. "breeding range" not "breeding-range").	A2	Consider removing hyphens from some terms in the revision	Consider in review
136	Stating 'the inadequacies of the existing' approach (p14) is an assumption.	A2	Consider making it clearer that it is assumed the current approach is inadequate	Consider in review
137	The importance of <i>E. ovata</i> is not mentioned in the 1st paragraph, or in 2nd paragraph p 12.	A2	<i>E. globulus</i> provides higher quality foraging resource (and therefore more important) than <i>E. ovata</i> . Consequently greater emphasis was put on <i>E. globulus</i> throughout the document. The need to include <i>E. ovata</i> in the areas indicated will be considered in the revision.	Consider in review
138	Omit term/heading 'breeding habitat' as it doesn't come into the decision tree and makes it more complex	A2	Consider omitting term in the revised PG	Consider in review
139	The section stating ' <i>summary of mapping layers required for FPP planning</i> ': ' <i>required</i> ' is a strong word. The section referring to 'desktop assessment' says that GlobMap 'can be used to flag the occurrence, extent and	A10	Review wording in revised PG	Consider in review

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	distribution of foraging-habitat...'. There is a discrepancy between this 'can' and the later 'required'.			
140	One of the mapping layers 'required' is GlobMap, which should therefore be made available for public scrutiny.	A10	The GlobMap has been developed and a document on this process is available on the DPIPWE website.	Yes
141	The Agreed Procedures should be made available for public scrutiny	A10	The Agreed procedures are available via the FPA web-site	Check web site
GRAMMAR AND FORMATTING - TABLES				
142	The Tables and definitions underpinning the decision-tree need more work. It is confusing whether the word ' <i>assessment</i> ' in Table B (p37) refers to the assessment of which part of the decision-tree to follow, or the assessment of foraging-habitat density. Otherwise it implies using different spatial scales to assess the presence and extent of different densities of foraging-habitat. But until you've done the assessment, you know neither its density nor its spatial scale of occurrence. I felt equally confused, and for similar reasons, consulting the definition of ' <i>on-site assessment</i> ' under the broader definition of the ' <i>habitat assessment process</i> '. It just seems like circular logic.	A10	The role of ground-based and remote assessments of habitat will be clarified.	Yes
143	Add the 'forest cover lost' to Table 1 showing where potential improvement could occur	A2	Including a column indicating current forest cover will be considered when revising the PG	Consider in review
144	It should be pointed out in Table C that the PI crown-cover classes are based on % of total crown-cover, whereas the senescence categories are based on % of mature trees showing senescence, regardless of the total crown-cover of those mature trees. The % ranges for senescence should be shown here, in the same way as the % ranges for crown-cover.	A10	This point will be clarified when revising the PG	yes
GRAMMAR AND FORMATTING - FIGURES				
145	Figure one is not helpful. The concepts behind the process should be	A2	This point will be considered when	Consider in

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	clearly identified if the detail developed is to remain structured and effective. Need to be able to see how this works. E.g. fit 'TFA', 'TFM', 'PG' into a particular slot. If too many items under one section it suggests it hasn't been specifically enough defined or the items are duplicating.		revising the PG	review
	GRAMMAR AND FORMATTING – APPENDICES			
146	The appendices are not referred to sequentially in the text.	A10	This will be revised	yes
147	The appendices are sometimes referred to by the wrong letter.	A10	This will be revised	yes
148	Appendix B needs one diagram showing 'what' and one as 'how'	A2	This point will be considered when revising the PG	Consider in review
	GRAMMAR AND FORMATTING – GLOSSARY			
149	<i>Adaptive management</i> : Poor definition, reference diagram, state 'learning from implementation', iterative, structured	A2	This point will be considered when revising the PG	Consider in review
150	<i>Foraging habitat</i> : Provide definition	A2	This will be done	Yes
151	<i>Interim Protection</i> . This is FT's business to define. FPA state the objective, not how to do it	A2	This point will be considered when revising the PG	Consider in review
152	<i>Mature forest</i> . Relate back to forest growth stage definitions (Jacobs 1955)	A2	The definition used by industry will be determined and will be considered when revising the PG	Consider in review
153	<i>Mature forest</i> . It may be more appropriate to define it according to the relative crown cover over 110 years old rather than the majority of trees over this age.	A10		
154	<i>Native vegetation</i> . Indicate treed vegetation with canopy closure exceeding 10%	A2	This point will be considered when revising the PG	Consider in review
155	<i>Nesting and foraging habitat</i> , and <i>nesting trees</i> . A bit more specificity is needed, minimum size, minimum hollow-bearing content etc.	A2	In essence, it is forest containing hollow-bearing trees that is nesting habitat. Size of trees, number of hollows etc is additional but unnecessary information.	No

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156	<i>Private land.</i> Remove 'and land owned or leased by the Commonwealth'	A2	This will be revised	yes
157	<i>PAMA</i> not mentioned so remove	A2	This will be revised	yes
158	<i>RFA.</i> Insert 'made' after 'Commonwealth governments'	A2	This will be revised	yes
159	<i>State forest:</i> Check definition	A2	This point will be considered when revising the PG	Consider in review
160	<i>SPIBAs.</i> Remove first four words, and specify how defined	A2	This will be revised	Yes
161	<i>TCFA.</i> Add to end 'and some additional measures'	A2	This will be inserted	yes

Acronyms

SP	Swift Parrot
PG	Swift Parrot Interim Planning Guideline
FSPG	Fauna Strategic Planning Group
FPA	Forest Practices Authority
TSS	DPIPWE Threatened Species Section
DPIPWE	Department of Primary Industries, Water and Environment
FT	Forestry Tasmania
SPRP	Swift Parrot Recovery Plan

Acknowledgements

The following are thanked for their comments on the interim planning guideline Vanessa Thompson, Amy Robertson (emailed general comments – comments on document separate), Forestry Tasmania, Steve Martini, Louise Crossley, Erik Martins, Terry Ware, Mark Neyland, Cynthia Clement, Simon Grove.

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Appendix A Monitoring the implementation of the swift parrot habitat planning guideline in areas covered by the Tasmanian forest practices system (2009 – 2011) (prepared for RFA priority species project)

Background

The swift parrot habitat planning guideline has been used to guide decision making for the maintenance of swift parrot habitat in areas covered by the Tasmanian forest practices system since early 2009. The decision-making approach is illustrated in Figure 1. It should be noted that the habitat planning guideline is still considered a draft and has not been endorsed for use by the Board of the FPA and the Secretary of DPIPW, as required by the procedures agreed between DPIPW and FPA for the management of threatened species under the forest practices system. This has meant that forest practices plans (FPPs) within the breeding range of the swift parrot are still being dealt with on a coupe-by-coupe basis. However, by using the habitat planning guideline, Forest Practices Authority (FPA) ecologists have been able to provide recommended actions to forestry practitioners that deliver landscape-scale management outcomes.

Implementation of the habitat planning guideline

Since January 2009 the FPA has received 138 notifications of FPPs being developed within the eastern breeding-range of the swift parrot. Planners developing these FPPs have required advice for the management of swift parrot habitat. A 'notification' comprises of a set of evaluation sheets which the forest planner completes, providing information the potential special values within coupe (harvest unit area) where a forestry operation is proposed (see Chuter and Munks, 2011a for additional information on the notification and biodiversity evaluation system).

Of the 138 notifications received, 44 were within Swift Parrot Important Breeding Areas (SPIBAs) and 94 were outside SPIBAs (Figure 2). A summary of the recommendations delivered in each forestry district (based on State forest divisions) is presented in Table 1.

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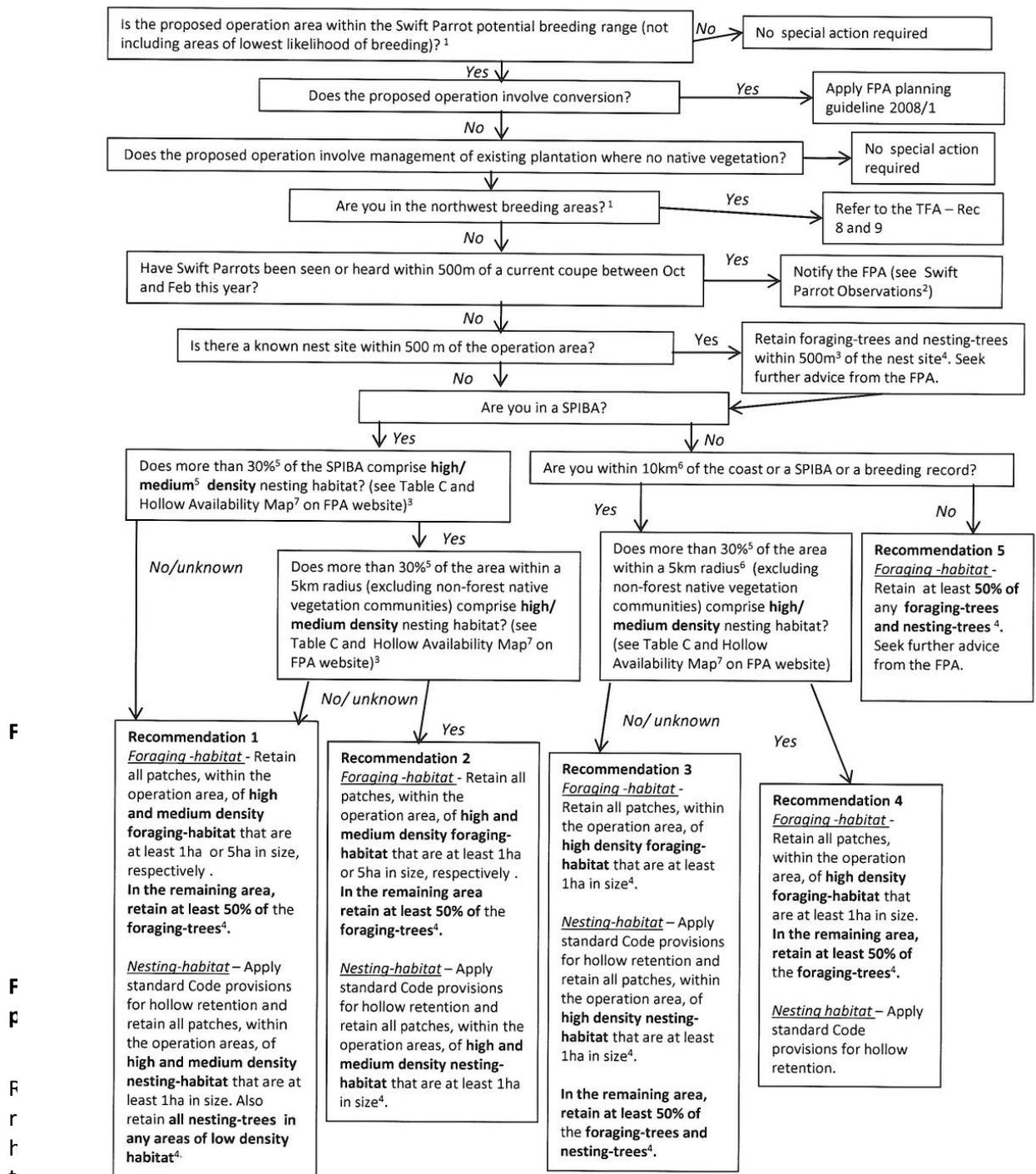


Figure 1 Decision tree in draft swift parrot planning guideline

Table 1: breakdown of recommendations delivered using the decision tree by forestry district and tenure. For the purposes of this table, industrial freehold and council owned land has been included in the private land category.

District	Tenure	Recommendation number									Total
		1	3	4	5	6	1*	3*	4*	5*	
Bass	Private	0	0	0	0	1	0	0	0	0	1
	State	0	0	1	0	5	0	0	0	0	6
Derwent	Private	8	1	1	10	9	0	0	0	0	29
	State	2	0	3	4	10	0	0	1	1	21
Huon	Private	8	1	0	1	2	0	0	0	0	12
	State	8	5	0	12	33	6	4	0	1	69
Total		26	7	5	27	60	6	4	1	2	138

Table 2 is a summary of the type and number of forestry operations which have required advice for the management of swift parrot habitat. The majority of operations have been native forestry, either clearfell (63) or partial harvesting (46). For the purposes of this summary table the term 'partial harvesting' represents thinning, retention of advanced growth, seed tree, shelterwood, and group or single tree retention operations (Wilkinson, G. 1994). The term 'Clearfell' represents clearfelling followed by regeneration to native forest (Wilkinson, 1994) and 'Conversion' is clearing followed by conversion to plantation or agriculture.

Table 2: Summary of the type of operation and number of notification by tenure.

Tenure	Clearfell	Conversion	Partial	Road	Mine	Water reservoir	Quarry	Firewood	Total
State	57	0	27	11	0	0	1	0	96
Private	5	13	19	0	0	0	0	1	38
State & private	0	0	0	0	1	0	0	0	1
Council	0	0	0	0	0	1	0	0	1
Industrial freehold	1	1	0	0	0	0	0	0	2
Total	63	14	46	11	1	1	1	1	138

Refusals of Forest Practices Plan

In some cases the FPA biodiversity program, in consultation with DPIPWE's Threatened Species Section, has negotiated management outcomes on a case-by-case basis where the full recommendation cannot be met; however the negotiated outcomes still meet the intent of the guideline.

Since 2009 there have been six FPPs refused by FPA due to the presence of swift parrot habitat and the application of actions delivered by the planning guideline. These refusals were referred to the Forest Practices Tribunal by the landowner. Three of these FPPs were proposed conversion

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operations (clearing of native forest and establishment of plantation) which the FPA refused based on the FPA Planning Guideline 2008/1 (Forest Practices Authority 2008), which is in the action recommended by one of the pathways of the decision tree. The tribunal upheld the decision by the FPA to refuse the FPP in all three conversion cases. One FPP for partial harvesting of swift parrot habitat within a SPIBA was also refused by the FPA and the decision upheld by the tribunal. For the remaining two FPPs a negotiated outcome was reached through the tribunal process which allowed some partial harvesting to take place while retaining habitat for the swift parrot..

Future work

A project was started by FPA in March 2011 looking at the standard of implementation of the management actions recommended for the conservation of swift parrot *habitat* . This project aims to monitor the implementation of current management actions for the swift parrot both during planning and implementation of a forest operation. It will evaluate the standards achieved by foresters in assessing habitat (both nesting and foraging) and implementing FPP prescriptions. It will also evaluate long-term reforestation success in areas where pre-2006 management actions for the swift parrot were implemented.

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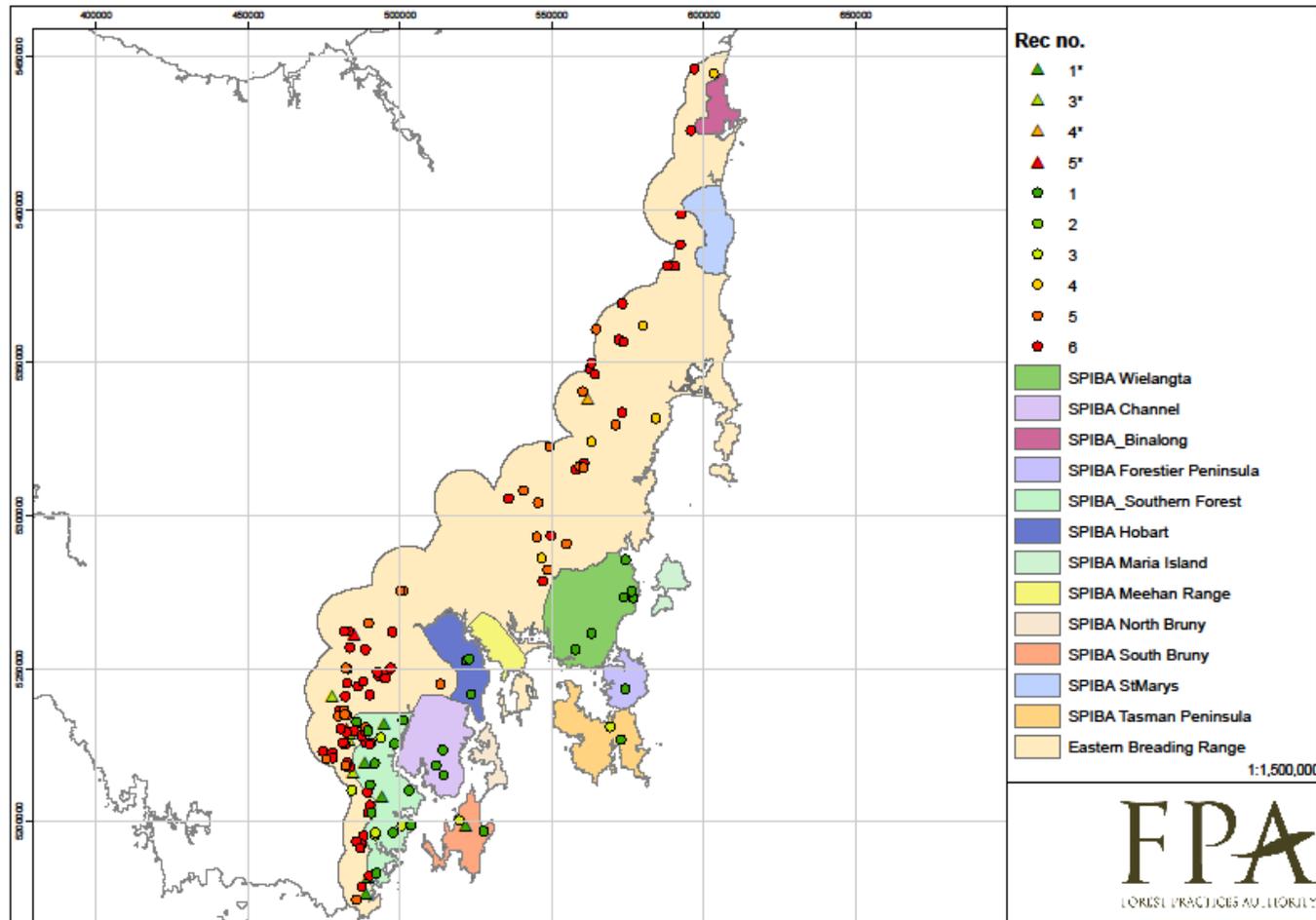
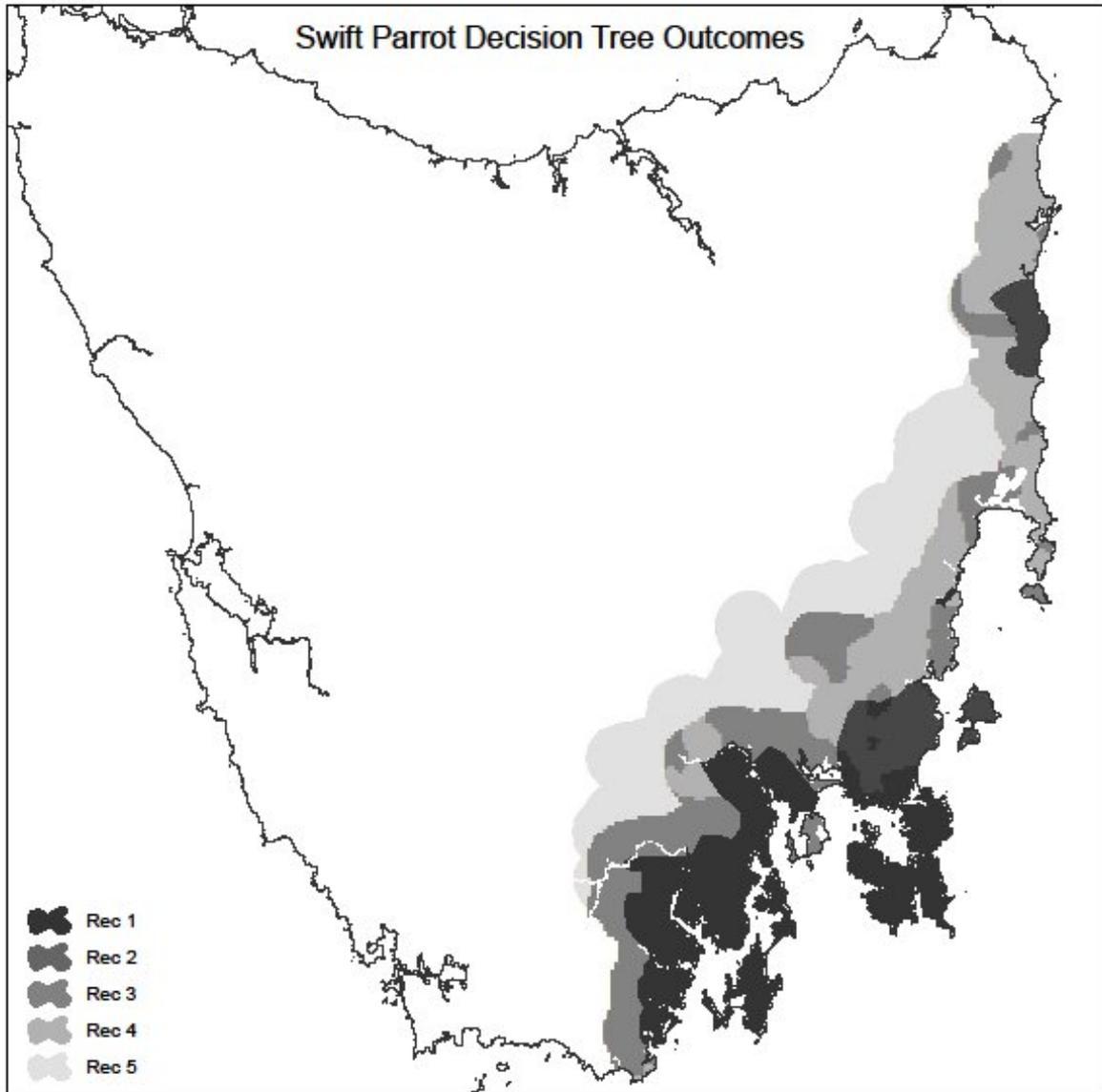


Figure 2: Location of notification for FPPs which have had recommendations from the swift parrot decision tree applied. Locations represented by a circle are from the previous version of the swift parrot decision tree (Figure 1) and locations represented by a triangle are from the current version of the swift parrot decision tree.

Appendix B Swift Parrot decision tree outcomes in eastern breeding range



Appendix C Letter from Chair of swift parrot Recovery Team

Dear Sarah,

On behalf of the Swift Parrot Recovery Team and Birds Australia, I write to convey our support of the draft Swift Parrot habitat planning guidelines in their current form. We support the notion of a single approach and single set of guidelines as an outcome of the FSPG process, as we believe this will reduce ambiguity and result in maximum level of habitat protection and appropriate management for the Swift Parrot in areas regulated under the forest practices system. We believe that the notion of an alternative approach and set of guidelines, as proposed by the industry affiliated members of the FSPG, introduces confusion and inconsistency into the process and steers away from the specific objective of achieving strategic conservation management of the Swift Parrot at a landscape-scale in areas covered by the Tasmanian Forest Practices System. The 'industry alternative approach' contains severely watered-down definitions of habitat that divert from those based on the actual ecology of the species, which is the central aim of the process - to protect the habitat that the species needs. There is also error in focussing on known nest records as nests are notoriously difficult to find and are only a sample of the last few years of monitoring. The recovery team recognises that the draft habitat planning guidelines is based on the ecology of the species but includes several compromises for the purposes of practicality of implementation. Ongoing refinement of these guidelines may be necessary, which will be possible during the consultative phase, but we do not recognise any requirement for a drastic overhaul at this stage, especially towards the dilution of habitat definitions or basing forest management around confirmed nest records.

We also have significant objections to having an approach that does not outline thresholds or actual guidelines for forest industry professionals to base their decisions on. This situation would lead to as many different approaches as there are planners making them (and not improving on the situation of past and present forest management), and could not guarantee the retention of sufficient breeding and foraging habitat. The draft habitat planning guidelines provide the guidance necessary for the industry to facilitate the protection of the majority of Swift Parrot habitat, but also allows for continued monitoring to identify whether this aim is being achieved. An alternative approach submitted to FPAC is inappropriate for the aforementioned reasons. To have two approaches would confuse all stakeholders and would not stem the loss of Swift Parrot breeding and foraging habitat. The draft habitat planning guidelines in their current form are balanced and have incorporated considerable input from all members of the FSPG. The recovery team would endorse these guidelines being submitted to FPAC and implemented in their current form.

One comment that we had, however, concerns the spatial extent of the eastern breeding range. In line with some of the views expressed by industry affiliated members of the FSPG, we believe that the inland (western) boundary of the eastern breeding range could be reduced (i.e. moved nearer to the coast) to remove species-specific management from areas that may provide little or no breeding or foraging habitat for the Swift Parrot. This alteration should be related to the abundance of foraging habitat, not nest records nor an arbitrary 10 km from the coast line. This alteration could be based on information available from the foraging habitat mapping project, again based on the ecology of the species, and remove restrictions on operations in areas not likely to be used by breeding Swift Parrots.

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If future monitoring reveals that areas in the western-most reaches of the eastern breeding range are important, then the guidelines are adaptive enough to take account of new information as it comes to hand and appropriate management regimes be prescribed.

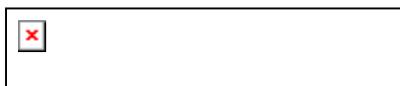
The FSPG process has been an incisive, comprehensive and consultative method that has culminated in a constructive tool for recommending appropriate forest management principles. This will significantly abate the forestry threat to the species in its Tasmanian breeding range, though it may not provide the be all and end all. The FSPG habitat planning guidelines are consistent with recovery actions identified by the Swift Parrot Recovery Team in the current national Recovery Plan. We would urge the FPAC to adopt the habitat planning guidelines and implement them immediately to begin the process of sound forest management practices that will take into account the ecological and biological traits of the Swift Parrot, and profoundly assist in its recovery.

Thank you for the opportunity to contribute to the process.

Regards,

Chris

Chris Tzaros | [Woodland Bird Conservation Project](#)



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Appendix D Outcome of review by Threatened Species Scientific Advisory Committee

Inquiries: Dr Sarah Munks
Phone: 6233 8710
Our ref:

Dr Ray Brereton
Chair
Threatened Species Scientific Advisory Committee
DPIPWE
GPO Box 44, Hobart, Tasmania 7001

14 May 2011

Dear Ray,

TSSAC consideration of Species Habitat Planning Guideline for the conservation management of *Lathamus discolor* (Swift Parrot) in areas regulated under the Tasmanian Forest Practices System

Thank you for your letter of 5 April 2011 with advice from the Scientific Advisory Committee (SAC) on the revised management prescriptions for the swift parrot, particularly in relation to the science underpinning the revised approach.

The advice from the Committee will be taken into account by the Board of the FPA and Secretary of DPIPWE in accordance with procedures agreed for the management of threatened species under the forest practices system.

A response to the detailed comments from SAC member Mark Wapstra has been provided in the attached. Please thank the Committee in their consideration of this planning guideline.

Yours Sincerely,

Graham Wilkinson
CFPO
Forest Practices Authority

Cc
Phil Bell, Manager, Threatened Species Section, DPIPWE

Sarah Munks, Manager, Biodiversity Program, FPA



Threatened Species
Scientific Advisory
Committee

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Our ref: RM-NH-CM-215289
Your ref: FPA/06/159/06

5 April 2011

Mr Graham Wilkinson
Chief Forest Practices Officer
Forest Practices Authority
30 Patrick Street
HOBART TAS 7000

Dear Graham

**TSSAC consideration of Species Habitat Planning Guideline for the
conservation management of the Swift Parrot in areas regulated under
the
Tasmanian Forest Practices System**

Thank you for your letter dated 17 February 2011 seeking advice from the Scientific Advisory Committee (SAC) on the revised management prescriptions, particularly in relation to the science underpinning the revised approach.

The Committee can advise that:

- (a) the Habitat Planning Guideline appears to be a comprehensive summary of the state of knowledge of swift parrot habitat, particularly breeding habitat although it is noted that there are still knowledge gaps.

Public comment on the Swift Parrot Interim Planning Guideline (SPIPG)

- (b) the Guideline approach is consistent with the Draft Swift Parrot Recovery Plan (Action 2.1c Develop a strategic management plan for Swift Parrot breeding habitat in Tasmania. Strategic management plan for Swift Parrot to include landscape and operational level planning guidelines and prescriptions for protection of important breeding habitat. Review and update management prescriptions for Swift Parrots for use in the Forest Practices System and Local Government landuse planning and approvals processes in Tasmania.)
- (c) the Guideline attempts to integrate the current knowledge regarding swift parrot foraging and breeding habitat to develop a decision tree support system to deliver management guidelines which the SAC would see as a useful approach which is consistent with the delivery of fauna prescriptions under the Threatened Fauna Adviser.
- (d) the management prescriptions do need to remain flexible around the areas of knowledge about swift parrot habitats where there is a higher level of uncertainty regarding their importance, particularly areas with the potential breeding range but not within known SPIBAs.

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- (e) the SAC recommend that the Guideline adopts an adaptive management approach whereby new information about swift parrot foraging and breeding habitat can be incorporated into the decision tree so that updated management prescriptions can be delivered.

Please find attached detailed comments from Mark Wapstra, a member of the SAC.

If you have any queries or comments or wish to discuss further, please contact me.

Yours sincerely



Mr Raymond Brereton
Chair
Scientific Advisory Committee (Threatened Species)

Public comment on the Swift Parrot Interim Planning Guideline (SPIPG)

Inquiries: Dr Sarah Munks

Phone: 6233 8710

Our ref:

Dr Ray Brereton

Chair

Threatened Species Scientific Advisory Committee

DPIPWE

GPO Box 44, Hobart, Tasmania 7001

14 May 2011

Dear Ray,

TSSAC consideration of Species Habitat Planning Guideline for the conservation management of *Lathamus discolor* (Swift Parrot) in areas regulated under the Tasmanian Forest Practices System

Thank you for your letter of 5 April 2011 with advice from the Scientific Advisory Committee (SAC) on the revised management prescriptions for the swift parrot, particularly in relation to the science underpinning the revised approach.

The advice from the Committee will be taken into account by the Board of the FPA and Secretary of DPIPWE in accordance with procedures agreed for the management of threatened species under the forest practices system.

A response to the detailed comments from SAC member Mark Wapstra has been provided in the attached. Please thank the Committee in their consideration of this planning guideline.

Yours Sincerely,

Graham Wilkinson

CFPO

Forest Practices Authority

Cc

Phil Bell, Manager, Threatened Species Section, DPIPWE

Sarah Munks, Manager, Biodiversity Program, FPA