

Progress report on 2009 Biodiversity Review key recommendations (at March 2015)

A.

Table 1 Category 1 - Matters for decision by agencies other than the FPA, or by the Tasmanian State Government generally

The recommended action relates to legislation other than the *Forest Practices Act 1985* and/or policy areas which are the responsibility of an agency or agencies other than the FPA, or of the Tasmanian Government as a whole. The proposed response to these recommendations is to consider referral to other agencies/forums as appropriate.

Recommendations:1,3,7,18,21,22,23,34,38. (21.4%)

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/Actions at March 2015
1	<i>That the FPA canvass with relevant agencies the establishment of a State-level set of overarching principles and objectives for off-reserve management of forest biodiversity. The establishment of such principles and objectives will require a multi-agency approach in consultation with stakeholders.</i> (Chapter 2 and Chapter 6, Table 6.1)	Agreed. The state should be asked by the FPA to convene a workshop with suitable stakeholder representation, to assist the development of agreed (across agencies) principles and objectives for off-reserve management of forest biodiversity in Tasmania in the context of a Tasmanian biodiversity strategy.	The FPA will consult with DPIPW in the first instance and provide advice to the Minister.	A whole-of-government approach has not yet been developed. In the interim the FPA has produced a guiding policy that sets out the contribution of non-reserve forests under the forest practices system to broader biodiversity conservation outcomes.

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3	<p><i>The state should review the relevant roles and responsibilities of affected agencies, including interagency working groups, with a view to ensuring a more integrated and coordinated approach to the conservation of biodiversity. (chapter two)</i></p>	<p>Agreed.</p> <p>FPA should recommend consideration by government.</p>	<p>The FPA will consult with DPIPWE in the first instance and provide advice to the Minister.</p>	<p>Agreed procedures between the FPA and DPIPWE were revised in March 2014. The revisions took into account the outcomes of recent legislative changes following the TFA process. This includes the need to ensure that the proposed management specifications to be inserted into a forest practices plan are in accordance with the duty of care provision of the Forest Practices Code.</p> <p>A decision-making process has also been developed as part of the agreed procedures. This flow-chart takes into account the fact that management of biodiversity values under the Forest Practices Code is part of a broader legal and policy framework for the conservation of biodiversity values in Tasmania. The recommended management actions delivered through the relevant planning tools mentioned in the agreed procedures are individually and collectively integrated and prioritised during the planning process to ensure that the most effective and practical outcomes are achieved within the 'duty of care' thresholds of the Code. The management of values beyond Code thresholds can only be achieved through voluntary agreement with the landowner or through other legislative mechanisms administered by the Department of Primary Industries, Parks, Water and the Environment.</p>

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7	<i>Fully implement the RFA and RFA review recommendations for delivery of ecologically sustainable forest management as recommended by the Ramsay Report. (chapter two)</i>	Agreed. Already In progress through the state government RFA Implementation Group.	Agreed. Already In progress through the state government RFA Implementation Group.	The recommendations under the RFA have been addressed and are reported as part of the third five-yearly review of the RFA to be released in early 2015.
18	<i>In the absence of any overarching vegetation management authority, this function [monitoring and reporting of non-forest vegetation losses, both threatened and non-threatened] should be adopted by the Forest Practices Authority. This may require legislative change and adequate resourcing. (chapters two and four)</i>	Not agreed. This issue requires wider consideration. Should be referred to the Vegetation Management Policy Advisory Group (VMPAG) for the development of policy and approach.	Not agreed. This issue requires wider consideration. Should be referred to the Vegetation Management Policy Advisory Group (VMPAG) for the development of policy and approach.	The FPA reports on threatened non-forest vegetation losses as part of the PNFEF monitoring requirement, but it does not have the authority or capacity to report on non-threatened, non-forest vegetation losses.

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21	<p><i>The state should immediately review the implementation of its Permanent Native Forest Estate Policy because clearance levels are approaching thresholds.</i> (chapter two)</p>	<p>Not agreed.</p> <p>The level of clearance is managed within an existing state government policy. Approaching the limit specified in the Policy is not a necessary reason to review policy implementation. However, there may be matters of managing the approach to and after the policy limits that warrant consideration.</p> <p>The FPA should continue to make the state and the stakeholders aware that the maintenance level is rapidly approaching.</p>	<p>The board of the FPA has provided regular advice to parliament on progress with the PNFE policy through its Annual Reports. The FPA wrote to the Minister in mid 2009 to raise concern about the approaching thresholds. The Minister sought a review of the policy and subsequently issued a revised policy on 21/12/09, which addresses the approaching thresholds by imposing a limit of 40 ha per property per year on future conversions in order to slow down the rate of conversion.</p>	<p>In the period 2009 to September 2011, the PNFE policy was revised on a number of occasions, both to set a limit on the rate of clearing of native forest as the Statewide level of retained forest approached the 95 percent level, and for the purpose of clarifying terminology and implementation mechanisms.</p> <p>The Policy is due to be reviewed on a five yearly basis in conjunction with the five yearly review cycle of the Tasmanian Regional Forest Agreement. The third five year review of the Regional Forest Agreement, due in 2012 has been delayed by agreement of the previous State and Federal Governments and will now occur in early 2015. To ensure the Policy and the RFA remain up to date, the current Tasmanian and Australian Governments have subsequently agreed that a review of the Policy will be undertaken in 2015 as a related action to the RFA five year review. The two Governments have also agreed to defer implementation of the ban on broadscale clearing and conversion of native forest on private land for twelve months pending this review. None of the key biodiversity settings, including the 95% retention level, and existing limits to clearing on private land are altered by these arrangements.</p> <p>The PNFE policy was updated in December 2014 to reflect these new arrangements pending the 2015 review</p>

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22	<p><i>Maintain forest areas so that a 50% loss since 1750 on a bioregional basis is not approached. In those areas where this is being approached, or has already been exceeded, maintain all existing viable forest areas.</i></p> <p>(chapter two, chapter six, table 6.1)</p>	<p>Not agreed.</p> <p>This is a matter for state government policy. FPAC notes that the existing statewide policy limits are being approached which will preclude any further broadscale clearing. Any decision to change existing policy should be taken in the context of socio-economic factors as well as biodiversity needs.</p>	<p>Further to Rec 21 above, the revised policy does not address pre-1750 forest loss.</p>	<p>The PNFE policy is due to be reviewed on a five yearly basis in conjunction with the five yearly review cycle of the Tasmanian Regional Forest Agreement. The third five year review of the Regional Forest Agreement, due in 2012 has been delayed by agreement of the previous State and Federal Governments and will now occur in early 2015. To ensure the Policy and the RFA remain up to date, the current Tasmanian and Australian Governments have subsequently agreed that a review of the Policy will be undertaken in 2015 as a related action to the RFA five year review. The two Governments have also agreed to defer implementation of the ban on broadscale clearing and conversion of native forest on private land for twelve months pending this review. None of the key biodiversity settings, including the 95% retention level, and existing limits to clearing on private land are altered by these arrangements.</p>

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23	<p><i>Native forest community bioregional thresholds should be set at a threshold of maintaining 75% of the 1996 area or 2000 ha, whichever is the greater, unless a review of mapping and conservation status determines those communities are not of bioregional significance. (chapter two, chapter six, table 6.1)</i></p>	<p>Not agreed.</p> <p>This is a matter for state government policy. FPAC notes that the existing statewide policy limits are being approached which will preclude any further broadscale clearing. Any decision to change existing policy should be taken in the context of socio-economic factors as well as biodiversity needs.</p>	<p>Further to Rec 21 above, the revised policy incorporates this recommendation.</p>	<p>Completed through amendments to the PNFEF in 2009.</p> <p>Key biodiversity settings, including the 75% bioregional threshold, and existing limits to clearing on private land remain in the 2014 revised version.</p>
38	<p><i>A formal, regular and transparent process be adopted for review and update of forest and non-forest species which potentially could become threatened. (chapter four).</i></p>	<p>Agreed.</p> <p>Review and update of the conservation status of species is the responsibility of DPIW. FPA should discuss with DPIW the development of such a process.</p>	<p>The FPA will consult with DPIPWE in the first instance and provide advice to the Minister.</p>	<p>A review of the species list included in the Threatened Fauna Adviser was carried out as part of the TFA review process. A revised version of the on-line Threatened Fauna Adviser was endorsed for use through the Tasmanian forest practices system in 2014.</p> <p>The development of a Threatened Flora Adviser is underway. This FPA/DPIPWE project includes a review of flora species which may be threatened by forest practices.</p>

Table 2 Category 2 - Matters relating to the Forest Practices Act itself

The recommended action relates to provisions in the Forest Practices Act itself and requires review and/or amendment of that Act. The proposed response to these recommendations would involve an approach to Government for action with regard to the Act where appropriate.

Recommendations: 2,4,6,9 (9.5%)

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/Actions at March 2015
2	<i>As a result of the Panel's review some changes would be needed in legislation and policies to enable the Forest Practices System to assist forest management systems to achieve sustainable management of biodiversity, such as to allow for the inclusion of measurable objectives in the Code, establishing consistency in threatened species management. (Chapter 2)</i>	Agreed in principle. Needs further consideration with regard to what specific changes to legislation and policy are needed and how objectives are defined and set.	The FPA will consult with DPIPWE in the first instance and provide advice to the Minister.	The FPA advised the Minister in 2009 that revision of the Forest Practices Code could not be completed without clarification of overarching objectives for the management of biodiversity. The Minister advised the FPA that he expected such matters to be addressed as part of the Tasmanian Forests Intergovernmental Agreement process. Such matters were not addressed through this process. However, in 2013 a guiding policy was developed by the Forest Practices Authority. This policy explains the contribution to be made by the Forest Practices Code towards sustainable forest management in Tasmania. It includes over-arching objectives for natural and cultural values, including biodiversity.
4	<i>Incorporate biodiversity conservation as a specific</i>	Agreed in principle.	The FPA will consult with DPIPWE in the first instance and provide advice	The FPA advised the Minister in 2009 that revision of the Forest Practices

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	<i>objective into the Forest Practices Act and include clear biodiversity objectives, sub-objectives and measurable outcomes in the Forest Practices Code (chapter two)</i>	Needs further consideration with regard to how objectives are defined and set.	to the Minister.	Code could not be completed without clarification of overarching objectives for the management of biodiversity. The Minister advised the FPA that he expected such matters to be addressed as part of the Tasmanian Forests Intergovernmental Agreement process. Such matters were not addressed through this process. However, in 2013 a guiding policy was developed by the Forest Practices Authority. This policy explains the contribution to be made by the Forest Practices Code towards sustainable forest management in Tasmania. It includes over-arching objectives for natural and cultural values, including biodiversity.
6	<i>Incorporate the National Forest Policy Statement's definition of sustainable forest management into the Forest Practices Act and revise the objective of the Forest Practices Act accordingly. (chapter two)</i>	Agreed in principle. The FPA should include a definition of SFM and that this could be developed from the current definition in the NFPS.	The FPA believes that the FP Act should contain a broad definition of sustainable forest management and that a more definitive statement should be articulated by way of a Forest Policy that sets out how the state will seek to achieve a sustainable balance of environmental, social and economic	The FPA advised the Minister in 2009 that revision of the Forest Practices Code could not be completed without clarification of overarching objectives for the management of biodiversity. The Minister advised the FPA that he expected such matters to be addressed as part of the Tasmanian Forests

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			factors. The FPA will provide advice on this matter to the Minister.	Intergovernmental Agreement process. Such matters were not addressed through this process. However, in 2013 a guiding policy was developed by the Forest Practices Authority. This policy explains the contribution to be made by the Forest Practices Code towards sustainable forest management in Tasmania. It includes over-arching objectives for natural and cultural values, including biodiversity.
9	<i>The concept of adaptive management and its key components should formally be recognised in the Forest Practices Act and Forest Practices Code so that changes can readily be incorporated. (chapter three)</i>	<p>Agreed.</p> <p>The Act already includes provision for an emphasis on research, review and continual improvement. This covers the clear intent of this recommendation. No further amendment to the Act is necessary.</p> <p>The FPA should formally document its procedures with regard to implementation of its adaptive management process.</p>	<p>The FPA believes that the term 'adaptive management' needs to be carefully defined within the current statutory requirements for research, review and continual improvement. The FPA will prepare a discussion paper on how this term will be defined and used in the context of the forest practices system.</p>	<p>A process for continual improvement (the development and adoption of new and revised processes, provisions and planning tools) has been developed and is available at http://www.fpa.tas.gov.au/_data/assets/pdf_file/0009/75195/Dev_and_review_process_July_2012.pdf</p>

Table 3 Category 3 - Matters relating to FPA Policies and Procedures – which can be implemented now

The recommended action relates to FPA policies and processes and, in the view of FPAC, should be implemented forthwith.

Recommendation: 10,11,12,19,35,36 (14.3%)

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/Actions at March 2015
10	<i>Sufficient resources should be made available to allow for maintenance of adequate databases, mapping and GIS facilities.</i> (chapters three and four)	Agreed. This is a matter for the FPA to decide in the context of its operations as a whole, including its budgetary process.	The FPA is currently preparing a budget submission to secure ongoing funding for its GIS/database capacity.	GIS, database and systems support is currently sourced through an external provider.

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11	<p><i>A review be undertaken into ways of increasing relevant research capacity to support the forest practices system, including reviewing the research role of the Forest Practices Authority, academia, industry and other sources. In any event, the Forest Practices Authority should actively seek to increase its capacity to address biodiversity-related issues especially to facilitate and assimilate relevant research as well as addressing needs for GIS and database establishment and maintenance.</i></p> <p>(chapter five)</p>	Agreed.	The FPA has continually sought ways to enhance the research capacity within the forest practices system and it will continue to make this a priority, starting with the completion of a document that sets out how research priorities are set and resourced within the FPA.	<p>Research capacity has reduced as a consequence of the closure of the CRC for Forestry in 2012. However, other mechanisms have been explored to keep the research capacity of the FPA.</p> <p>A research officer position has been supported since 2010 to ensure the development and implementation of an effectiveness monitoring program. Specialists within the FPA maintain their professional skills through affiliation with the University and involvement in collaborative research projects.</p>
12	<p><i>The Forest Practices Authority actively reviews and upgrades a systematic program of effectiveness monitoring for biodiversity conservation.</i></p> <p>(chapter five)</p>	Agreed.	The FPA has identified this as a priority and it has commenced the development of a systematic program for effectiveness monitoring across all values.	The FPA has a systematic program of effectiveness monitoring managed by the FPA Research officer. Priority effectiveness monitoring projects are undertaken each year and a summary of the results is provided as part of the FPA Annual report...

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19	<p><i>There should be ongoing development of tools required to meet the recommended principles and objectives. The forest practices system planning and information support tools should be captured in a web-based Biodiversity Decision Support System so that it can be easily updated and accessed by planners and practitioners.</i> (chapter four)</p>	<p>Agreed.</p> <p>Review of planning tools required to assist forest managers.</p> <p>Development of an integrated FPA web-based Decision Support System for forest planners. This would be a 'one-stop shop' for FP system planning tools, including relevant GIS information.</p>	<p>The ongoing improvement of planning tools is a priority and it will remain so subject to funding.</p>	<p>A one-stop location for planners has been developed and implemented as part of the web-site upgrade.</p> <p>Review of the Biodiversity Values database has been completed and its ongoing maintenance is supported.</p> <p>The revised threatened Fauna adviser was endorsed for use through the forest practices system in 2014..</p> <p>Review of the hollow provisions of the Code has been completed and a mature habitat management approach has been developed. This approach, however, was not endorsed for use through the forest practices system pending further evaluation of impacts on economic values.</p> <p>A landscape planning guideline has been developed and will be submitted to the Board of the FPA for endorsement in 2015.</p> <p>Technical notes required to support the Threatened Fauna Adviser have been updated and new ones developed.</p>

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34	<p><i>That the Forest Practices Code specifically emphasise the importance of ensuring that species currently not threatened do not become threatened through forestry actions.</i> (chapters one and two)</p>	<p>Agreed.</p> <p>This reflects existing policy as expressed in the Threatened Species Strategy which has objectives to:</p> <p>“1. Ensure that threatened species can survive and flourish in the wild. 2. Ensure that threatened species in their habitats retain their genetic diversity and potential for evolutionary development. 3. Prevent further species from becoming threatened.”</p> <p>And is consistent with the Objective 3a) in Schedule 2 of the Threatened Species Protection Act 1995:</p> <p>“3. The objectives of the threatened species protection system established by this Act are, in support of the objectives specified in Part 1 of this Schedule – (a) to ensure that all native flora and fauna in Tasmania can survive, flourish and retain their potential for</p>	<p>Agreed. This is a key principle. A systematic process needs to be developed to be able to identify species that may be at risk of becoming threatened, noting that it is not possible to monitor all species and that a more strategic approach needs to be developed to manage habitat at the landscape level in time and space. The FPA will liaise with DPIPWE and other land managers to develop more strategic approaches.</p>	<p>A landscape planning guideline and on-line mature habitat management approach have both been developed but are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities.</p>

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35	<p><i>The Forest Practices Authority should seek to ensure that there are clear links between its biodiversity conservation measures and processes and the requirements of threatened species Recovery Plans and Listing Statements. (chapters two and four)</i></p>	<p>Agreed.</p> <p>Requirements of Recovery Plans and Listing Statements for threatened species to be taken into account in the development of any management actions delivered via the FP system.</p>	<p>Agreed.</p> <p>The FPA and DPIPWE will, through the Agreed Procedures Requirements seek to ensure that Recovery Plans and Listing Statements for threatened species are developed in consideration of any management actions that can be delivered via the FP system.</p>	<p>Agreed procedures have been revised with clear roles and responsibilities.</p> <p>The management prescriptions incorporated into a Forest Practices Plan to meet the management objective for <i>a</i> threatened species are derived from management recommendations agreed between DPIPWE and FPA. The endorsement process for this management approach, implemented through the Forest Practices system, includes a review by the Tasmanian Threatened Species Scientific Advisory (TSSAC) committee in 2013. As part of this review the TSSAC assesses the management actions against the relevant actions in the Recovery Plan for a particular species.</p> <p>During the review of the Threatened Fauna Adviser the TSSAC found that the management recommendations delivered were consistent with the approach identified in recovery plans and listing statements to assist with the conservation of the species.</p>

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36	<i>The Forest Practices Authority should encourage the development of strategic level planning tools and processes relevant to threatened species.</i> (chapter four)	Agreed.	Agreed, see Rec.34.	<p>Working with forest managers and DPIPW to develop strategic plans is a priority for the FPA Biodiversity program. A project was started in 2014 to develop strategic plans for management of wedge-tailed eagle nests at a regional scale.</p> <p>A landscape planning guideline and on-line mature habitat management approach have both been developed but are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities.</p>

Table 4 Category 4 - Matters relating to FPA Policies and Procedures – requiring further consideration

The recommended action relates to FPA policies and processes but needs further consideration before a decision on adoption or otherwise by the FPA, typically to consider matters of balance between natural, social and economic values. **There is no reason such further consideration cannot be undertaken within the timelines of the current Code review.**

Recommendation:5,8,13,15,20,30,37 (17%)

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015

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5	<p><i>Incorporate those sub-objectives and measurable outcomes identified in table 6.1 into the Forest Practices Code. Reporting on progress should be formally linked to Forest Practices Authority annual reporting and/or to State of Forest reporting as appropriate. (chapter six, table 6.1). Further development and quantification of several sub-objectives identified in table 6.1 [in particular those identified by the panel as requiring further development and consultation] should be carried out by the Forest Practices Authority, in consultation with stakeholders so that implementation is practical and measurable. The panel consider that the consultation process should not be used to delay implementation of the measurable objectives.</i></p>	<p>Agreed in principle.</p> <p>FPA to convene a group to further consider, develop and quantify the measurable objectives provided in table 6.1. As noted in the recommendation, it is important that this should be carried out, <i>“in consultation with stakeholders so that implementation is practical and measurable”</i>.</p>	<p>Agreed, noting that sub-objectives and outcomes must be derived from higher level policy (see Recs.2 and 4)</p>	<p>The FPA advised the Minister in 2009 that revision of the Forest Practices Code could not be completed without clarification of overarching objectives for the management of biodiversity. The Minister advised the FPA that he expected such matters to be addressed as part of the Tasmanian Forests Intergovernmental Agreement process. Such matters were not addressed through this process. However, in 2013 a guiding policy was developed by the Forest Practices Authority. This policy explains the contribution to be made by the Forest Practices Code towards sustainable forest management in Tasmania. It includes over-arching objectives for natural and cultural values, including biodiversity.</p> <p>More specific goals and targets were developed by the project team and stakeholders as part of Landscape Planning Guideline development.</p>

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8	<p><i>The forest practices system should increase its capacity to plan and manage strategically to provide more effective landscape level guidance for planners. Four scales of planning should be considered. These scales are:</i></p> <ol style="list-style-type: none"> 1. <i>statewide</i> 2. <i>bioregional (IBRA)</i> 3. <i>Planning Context Unit (PCU)—a notional contextual area around the planning node which depends on the scale of operation—the panel suggest using the CFEV major drainage basins</i> 4. <i>Coupe Context Unit (CCU) which on State forest may be a notional 400 ha unit around the coupe, or may be a private property boundary and surrounding land-use context.</i> <p>(chapter four)</p>	<p>Agreed</p> <p>FPA should consider, in consultation with stakeholders, proposed planning scales for inclusion in the revised Forest Practices Code and associated planning documents.</p>	<p>Agreed</p> <p>The FPA will consider, in consultation with stakeholders, proposed planning scales for inclusion in the revised Forest Practices Code and associated planning documents.</p>	<p>Some progress has been made on this recommendation.</p> <p>A landscape planning guideline and on-line mature habitat management approach have both been developed to assist with planning at multiple spatial scales. However, these are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities</p> <p>In 2014 it was agreed that "property" for the purposes of the application of the duty of care provisions of the Forest Practices Code to PTPZ land should be defined as follows:</p> <p><i>a management unit within a one-kilometre radius of a coupe's centre, as defined by the Landscape Context Planning system used by Forestry Tasmania or a larger forest management unit where this would deliver better management outcomes for socio-economic and environmental factors.</i></p>

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13	<p><i>The Forest Practices Authority should collaborate with other relevant bodies, including DPIW, FT, PFT and private land stakeholders to prepare a discussion paper on its role in the provision of strategic level planning, with a view to informing government on the need to clarify roles and responsibilities across government for the strategic level conservation of biodiversity outside of reserves. This paper should include discussion on strategies and processes to deal with emerging issues such as the effects of climate change. (chapters three and four)</i></p>	<p>Agreed.</p> <p>Discussion paper needed on the role of the Forest Practices System in strategic level conservation of biodiversity outside of reserves.</p>	<p>Agreed, this needs to be done in conjunction with Recs. 2, 4 and 34.</p>	<p>On further review this is not a task that can be achieved by the FPA. The FPA can only deal with activities that fall within the jurisdiction of the Forest Practices Act. These activities should form part of a broader strategic approach for the conservation of biodiversity that should be developed under a whole of government approach.</p> <p>It should be noted that management of biodiversity values under the Forest Practices Code is part of a broader legal and policy framework for the conservation of biodiversity values in Tasmania. The recommended management actions delivered through the relevant planning tools mentioned in the agreed procedures are individually and collectively integrated and prioritised during the planning process to ensure that the most effective and practical outcomes are achieved within the 'duty of care' thresholds of the Code. The management of values beyond Code thresholds can only be achieved through voluntary agreement with the landowner or through other legislative mechanisms administered by the Department of Primary Industries, Parks, Water and the Environment.</p>

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15	<i>Biodiversity conservation issues should be considered at each of the four scales (see Recommendation 8) at the planning stage and integrated with other non-wood values (e.g. visual landscape, cultural heritage). (chapter four)</i>	Agreed. Consider and develop a process to enable consideration of all 'special' values at each of the four scales. This would include provision of integrated advice from FPA specialists early in the planning phase (e.g. development of three year plan, property planning), wherever possible.	Agreed, this needs to be done in conjunction with Recs. 2, 4 and 34.	A landscape planning guideline and on-line mature habitat management approach have both been developed to assist with planning at multiple spatial scales. However, these are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities
20	<i>The history of management for the conservation of biodiversity values under the forest practices system should be formally recorded on an appropriate database to aid in future decision making and ensure continuity of management. The degree to which this is undertaken would vary depending on the measure applied and this should be determined by the Forest Practices Authority. (chapter four)</i>	Agreed. But, implementation in detail needs to be on a basis agreed by FPA in - consultation – with stakeholders, for reasons such as practicality and cost effectiveness..	The FPA will maintain a database of FPPs and biodiversity advice as a record of the prescriptions applied to operational areas. The FPA will investigate the feasibility of maintaining the FPP data as a spatial (GIS) system.	FPP data are now stored in an FPA database and can be accessed for planning purposes. The FPA does not have the capacity to store the FPP data as spatial GIS layers.

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37	<i>Relevant authorities should progress programs to integrate threatened species into landscape level planning, using multi-species approaches where appropriate. (chapter four)</i>	Agreed.	Agreed, see Rec. 34.	This is being done by the FPA and DPIPWE with respect to operations that fall within the jurisdiction of the Forest Practices Act.

Table 5. Category 5 - Matters relating to the Forest Practices Code – which can be implemented now as part of the current Code review

The recommended action relates to provisions of the Forest Practices Code itself (typically review or amendment of existing measures) and, in the view of FPAC, should be implemented forthwith.

Recommendation: 16,17 (17.1 and 17.2), 24,27,31,41.(17%)

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
16	<i>Gene conservation issue such as the current management to ameliorate exotic gene flow from Eucalyptus nitens to E. ovata should be included in the Forest Practices Code.(chapter four)</i>	Agreed. The gene conservation issue should be included in the Code. Exactly how this is done needs further discussion with stakeholders.	This will be addressed as part of the current review of the code.	This is now covered by an FPA technical guideline and information on interpretation of this technical guideline is provided at the FPA Biodiversity courses
17(17.1 and 17.2 only)	<i>The following elements should be incorporated into the overarching Forest Practices Code principles:</i> <i>17.1 Change flora and fauna in the Forest Practices Code to biodiversity to include three levels of biodiversity—genes, species and ecosystems. (chapter two)</i> <i>17.2 Planning should consider appropriate spatial and temporal scales and integrate relevant terrestrial and aquatic systems. (chapters two and four)</i>	Agreed. Incorporate into principles of Forest Practices Code	This will be addressed as part of the current review of the code.	These elements do not by themselves warrant a revision of the code. However, they are being actively incorporated into the planning tools that support the code.
24	<i>The Forest Practices Code should explicitly recognise the importance of maintaining old growth attributes in the forest and of maintaining structural diversity</i>	Agreed. Include this as a provision in	This will be addressed as part of the current review of the code.	

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
	<i>across the landscape.</i> (chapter four, chapter six, table 6.1)	planning section of revised Forest Practices Code. FPA to provide appropriate planning tool via its web-site and to monitor implementation.		
27	<i>The Forest Practices Code should recognise that there are a number of ways of achieving structural habitat retention and flexibility of prescription application should be used to meet this objective, albeit with a reporting requirement to ensure that appropriate provisions have been made.</i> (chapter four)	Agreed.	This will be addressed as part of the current review of the code.	
31	<i>Rehabilitation to become a 'should be considered' requirement in general and a 'will' requirement where required to meet specified ecological objectives. For example, rehabilitation of stream-side vegetation may be required where clear and positive biodiversity outcomes can be achieved in a practical way.</i> (chapter four)	Agree in principle. Exactly how this is done has important socio-economic and biodiversity implications, and therefore needs further discussion with stakeholders.	This will be addressed as part of the current review of the code.	
41	<i>That the current revision of the Forest Practices Code evaluate, and where relevant incorporate additional suggestions made by the panel in the body of this report and on existing biodiversity provisions of the Forest Practices Code.</i> (Appendix F	Agreed. Incorporate into the revised Forest Practices Code where relevant.	This will be addressed as part of the current review of the code.	

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
	in the Biodiversity review report)			

Table 6. Category 6 - Matters relating to the Forest Practices Code - requiring further consideration as part of the current Code review

The recommended action relates to provisions of the Forest Practices Code itself (typically review or amendment of existing measures) but needs further consideration before that is done, typically to consider matters of balance between natural, social and economic values.

Recommendation: 14,17 (17.3),25,26,28,29,30,32,33,39,40 (26%)

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
14	<p><i>The panel note and endorse that the current Forest Practices Code Wildlife Habitat Strip provision applies to both state and private land where relevant. They encourage the further development on private land where this is achievable. (chapter four)</i></p>	<p>Agreed.</p> <p>FPAC notes/recognises that WHSs are appropriate for large forest holdings in Public and Private estates but are not appropriate across multiple small scale holdings where the principle of ‘duty of care’ should be used to achieve the same aim of WHSs – connectivity, linkages and retention of mature forest elements. A clear objective is needed and flexibility in ways to achieve the objective. The FPA should recommend a clear objective and consult with stakeholders on how to progress this.</p>	<p>Agreed.</p> <p>The FPA recognises that WHSs are appropriate for large forest holdings in Public and Private estates but are not appropriate across multiple small scale holdings where the principle of ‘duty of care’ should be used to achieve the same aim of WHSs – connectivity, linkages and retention of mature forest elements. A clear objective is needed and flexibility in ways to achieve the objective. The FPA will recommend a clear objective and consult with stakeholders on how to progress this.</p>	<p>A landscape planning guideline and on-line mature habitat management approach have both been developed to assist with planning at multiple spatial scales. However, these are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
17(17.3)	<p><i>The following elements should be incorporated into the overarching Forest Practices Code principles:</i></p> <p><i>17.3 Adoption of more surrogate habitat approaches and other systems combined with individual prescriptions where these are needed. In some cases the tools for such an approach are already in place e.g. the Conservation of Freshwater Ecosystem Values database. (chapters three and four)</i></p>	<p>Agreed.</p> <p>FPA should develop further surrogate habitat approaches for incorporation into the Forest Practices Code. Translation from principle to practical measures needs to be done with care.</p>	<p>Agreed, this will be pursued in conjunction with Rec.34.</p>	<p>Surrogate approaches have been incorporated into the landscape planning guideline and mature habitat management approach.</p> <p>A habitat based approach is taken in the conservation of threatened species through the forest practices system.</p>
25	<p><i>In order to maintain structural diversity in the forests, no more than 15% of the native forested area of any CFEV catchment should be harvested by clearfell burn and sow methods in any 10 year period. (chapter four, chapter six, table 6.1)</i></p>	<p>Not agreed.</p> <p>FPAC accepts the principle of an objective to maintain structural diversity within a catchment but the proposed percentage figure is not agreed. Difficulties in implementing this, particularly on private property, including socio-economic implications means that it needs to be discussed a good deal more before moving to implementation.</p>	<p>The FPA believes that the selection and intensity of silvicultural regimes should be covered by a Forest Policy (see Rec.6), which identifies the criteria for the appropriate type and intensity of regimes according to broader environmental, social and economic factors.</p>	<p>No action but see relevant progress under rec 26 below..</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
26	<p><i>Aim to maintain at least 30% of native vegetation (e.g. 30% cover or basal area) with a focus on trees with mature and old growth elements currently available at all four spatial scales. (chapter four, chapter six, table 6.1)</i></p>	<p>Not agreed.</p> <p>FPAC accepts the principle of maintenance of a proportion of mature forest elements at different spatial scales, but the proposed percentage figure is not agreed. This issue has very strong socio-economic implications on both private property and state forest, and therefore needs very careful consultation before moving to implementation.</p>	<p>The FPA believes that the intensity of harvesting practices (including the size and dispersal of coupes) and broad objectives for retaining structural diversity should be covered by a Forest Policy (see Rec.6), which takes account of broader environmental, social and economic objectives.</p>	<p>A landscape context planning system has been adopted by Forestry Tasmania for the PTPZ land. This includes a metric for the maintenance of mature forest.</p> <p>A landscape planning guideline and on-line mature habitat management approach have both been developed to assist with planning for mature forest habitat and other biodiversity elements at multiple spatial scales. However, these are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
28	<p><i>The forest practices system and Forest Practices Code should take appropriate account of biodiversity conservation in the context of planning and management of plantations, and the current code review should address this need as an explicit task. (chapter four)</i></p>	<p>Agreed.</p> <p>The definition of ‘appropriate account’ is fundamentally important here and must take full account of socio-economic factors.</p>	<p>This will be done as part of the current review of the code –see also Rec.29.</p>	<p>The revision of the threatened fauna adviser takes into account management actions required for threatened species in plantation dominated landscapes.</p> <p>A landscape planning guideline has been developed to assist with the planning and management of production forest areas (both native forest and plantation) at multiple spatial scales. However, these are not yet endorsed for use through the forest practices system.</p> <p>The biodiversity evaluation sheet for proposed plantation operations is currently being revised.</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
29	<p><i>In June 2000, a workshop on Fauna Issues and Plantation Design was convened by the Forest Practices Authority and the CRC for Sustainable Forest Production (Munks and McArthur 2001). The outcomes of the workshop provide a set of principles and recommendations which could be incorporated into the Forest Practices Code after a review to clarify conflicts between some recommendations for browsing control and those for biodiversity maintenance. (chapter four)</i></p>	<p>Agree in principle.</p> <p>The principles and recommendations of the workshop should be considered as part of the Code review.</p> <p>Plantation management has a role in the broader context of biodiversity conservation. That role needs its own consideration and outcomes of this should not be pre-empted.</p>	<p>Agreed, in conjunction with Rec.28.</p>	<p>The outcomes of this workshop will be reviewed in the development of the plantation biodiversity evaluation sheet.</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
30	<p><i>The Forest Practices Authority should develop water-specific planning tools to maintain a proportion of unharvested headwater catchments and to maintain the spatial and temporal integrity of longitudinal and lateral connections of river headwater networks. These planning tools should take a flexible approach and the proportion of catchment required may be achieved as part of the CCU planning aim to maintain 30% of native vegetation. The effectiveness of the measures applied need to be monitored and the measures need to be further developed through research. (chapter four, chapter six, table 6.1)</i></p>	<p>Not agreed.</p> <p>FPAC supports the development of specific planning tools by the FPA in partnership with relevant agencies, but the proportion of vegetation to be retained is not agreed and requires economic analysis and consideration before the concept is finalised.</p>	<p>The FPA believes that this is more appropriately the primary responsibility of the DPIPWE and that it should be pursued in conjunction with Recs. 1 and 3.</p>	<p>FPA lacks the in-house expertise to do this independently, but has attempted to progress this recommendation in collaboration with others. Potential avenues have been pursued but at this stage have been limited by available resources (access to the forest estate model, time collaborators have to progress this etc).</p> <p>Water-specific planning tools (CFEV) are being progressed by DPIPWE.</p> <p>Related projects include the downstream impact CRC/FPA project and work on the management of catchments important for threatened fish species.</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
32	<i>In the absence of an integrated statewide approach to the conservation of remnant vegetation, the forest practices system should specifically address the retention and management of remnant vegetation in different situations, with an emphasis on remnants of high conservation significance.</i> (chapter four)	Agreed. Include as a principle/objective in Forest Practices System. Exactly how this is done needs further discussion with stakeholders and agreed definitions of remnant vegetation and high conservation significance.	This will be done as part of the current review of the code.	A remnant management technical note has been drafted and will be submitted to the Board of the FPA for consideration in 2015.

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
33	<p><i>The following aspirational objective be included for the management of genetic resources in areas covered by the forest practices system:</i></p> <p style="padding-left: 40px;"><i>Maintain natural levels of genetic diversity and patterns of differentiation in forest tree species and species complexes to ensure their long-term evolutionary potential retain natural values and retain genetic resources for human use. (chapter two)</i></p> <p><i>The panel note that this objective could only be operationalised through the application of specific examples such as the protection of geographically separate or genetically distinct populations, the use of local seed sources, and the management/mitigation of gene incursions by exotic species. Some of these procedures are already in place.</i></p>	<p>Agreed in principle.</p> <p>FPAC notes that wording needs further attention. This goal is already in the Code but needs rewording. Agreement is subject to rewording.</p>	<p>This will be done as part of the current review of the code.</p>	<p>This has been addressed through the release of the Guiding Policy.</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
39	<p><i>That the Forest Practices Code encourages the move away from reliance on large and extensive clearfell burn and sow (CBS) harvesting systems in native forests and that maximum CBS coupe size should generally not exceed 60 ha. Where coupe sizes need to be larger (e.g. for safety and fire management considerations or to avoid adverse environmental outcomes) the reasons should be explicitly stated. (chapter four, chapter 6, table 6.1)</i></p>	<p>Not agreed.</p> <p>FPAC accepts that a move away from reliance on large and extensive CBS harvesting systems in native forests is desirable in principle. The context of any detail of such a move, including coupe size, needs much more discussion.</p>	<p>The FPA believes that the intensity of harvesting practices (including the size and dispersal of coupes) and broad objectives for retaining structural diversity should be covered by a Forest Policy (see Recs.6 and 26), which takes account of broader environmental, social and economic objectives.</p>	<p>The FPA remains of the view that this matter should be covered by a state policy that takes account of the relevant economic, social and environmental factors.</p>

Rec No.	Recommendation	Proposed actions and comments from FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
40	<i>That the Forest Practices Code incorporate provisions on the size and dispersal of coupes in relation to both plantations and native forest to ensure the maintenance of structural diversity at multiple spatial scales. (chapter four)</i>	Not agreed. FPAC believes that this issue should not be progressed beyond what is currently in the Code, without further analysis.	The FPA believes that the intensity of harvesting practices (including the size and dispersal of coupes) and broad objectives for retaining structural diversity should be covered by a Forest Policy (see Recs.6 and 26), which takes account of broader environmental, social and economic objectives.	A landscape context planning system has been adopted by Forestry Tasmania for the PTPZ. This includes a metric for the maintenance of mature forest and dispersal. A landscape planning guideline and on-line mature habitat management approach have both been developed to assist with planning for mature forest habitat and other biodiversity elements at multiple spatial scales. However, these are not yet endorsed for use through the forest practices system. Both of these planning tools are designed to help with strategic planning to reduce the risk of negative impacts of forestry activities on species and communities

B. Alternative responses to Specific Recommendations

Whilst the Council reached consensus on the appropriate response to most of the recommendations as outlined in Attachment 1 some members expressed alternative views in respect of some key recommendations. These are detailed below.

Table 1 Category 1 - Matters for decision by agencies other than the FPA, or by the Tasmanian State Government generally

Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
21	<i>The state should immediately review the implementation of its Permanent Native Forest Estate Policy because clearance levels are approaching thresholds.</i> (chapter two)	<p>Agreed.</p> <p>The rapid approach of the clearance thresholds requires an urgent review of the implementation of the policy</p> <p>The FPA should continue to make the state and the stakeholders aware that the maintenance level is rapidly approaching and advocate immediate review.</p>	See response for A. Rec 21	See response for A. Rec 21

		Category 2		
		Matters Relating to the Forest Practices Act itself		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
4	<i>Incorporate biodiversity conservation as a specific objective into the Forest Practices Act and include clear biodiversity objectives, sub-objectives and measurable outcomes in the Forest Practices Code (chapter two)</i>	<p>The alternative view in respect of recommendations 4,6 and 9 is:</p> <ul style="list-style-type: none"> • that they should all be agreed, • that the Forest Practices Act and the Forest Practices Code should be amended to specifically incorporate biodiversity conservation as an objective of the Act, • that the Forest Practices Act incorporate the NFPS definition of Sustainable Forest Management, and • the Act and Code formally recognise the concept of adaptive management. 	See response for A. Recs 4,6 & 9	<p>The FPA has produced a guiding policy that sets out the contribution of non-reserve forests under the forest practices system to broader biodiversity conservation outcomes.</p> <p>The FPA landscape planning guideline provides goals and management targets.</p>

		Category 2		
		Matters Relating to the Forest Practices Act itself		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
6	<i>Incorporate the National Forest Policy Statement's definition of sustainable forest management into the Forest Practices Act and revise the objective of the Forest Practices Act accordingly. (chapter two)</i>	See above	See response for A.Recs 4,6 & 9	The FPA has produced a guiding policy that sets out the contribution of non-reserve forests under the forest practices system to broader biodiversity conservation outcomes.
9	<i>The concept of adaptive management and its key components should formally be recognised in the Forest Practices Act and Forest Practices Code so that changes can readily be incorporated. (chapter three)</i>	See above The FPA should formally document its procedures with regard to implementation of its adaptive management process.	See response for A. Recs 4,6 & 9	A process for continual improvement (the development and adoption of new and revised processes, provisions and planning tools) has been developed and is available at http://www.fpa.tas.gov.au/_data/assets/pdf_file/0009/75195/Dev_and_review_process_July_2012.pdf

		Category 3		
		Matters relating to FPA Policies and Procedures – which can be implemented now		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
22	<i>Maintain forest areas so that a 50% loss since 1750 on a bioregional basis is not approached. In those areas where this is being approached, or has already been exceeded, maintain all existing viable forest areas. (chapter two, chapter six, table 6.1)</i>	<p>Agreed</p> <p>It was argued that this should be agreed on socio-economic and biodiversity grounds. It was further argued that such a policy is required to achieve sustainable forest management on land subject to Forest Practices regulation.</p>	<p>See response for A. Rec. 22</p>	<p>See response for A. Rec. 22.</p> <p>This is no longer a priority given the reduction in conversion activity, and the planned cessation of broad scale clearing by 1/1/2016.</p>

		Category 3 Matters relating to FPA Policies and Procedures – which can be implemented now		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
23	<i>Native forest community bioregional thresholds should be set at a threshold of maintaining 75% of the 1996 area or 2000 ha, whichever is the greater, unless a review of mapping and conservation status determines those communities are not of bioregional significance. (chapter two, chapter six, table 6.1)</i>	<p>Agreed</p> <p>It was argued that this should be agreed on socio-economic and biodiversity grounds. It was further argued that such a policy is required to achieve sustainable forest management on land subject to Forest Practices regulation. Some forest communities in some bioregions have been cleared well beyond the 75% remaining since 1996 threshold (67% and 68% for E.regnans in Ben Lomond and Woolnorth respectively) and are effectively bioregionally threatened.</p>	See response for A. Rec 23	Completed through amendments to the PNFEF in 2009.

		Category 3		
		Matters relating to FPA Policies and Procedures – which can be implemented now		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
5	<i>Incorporate those sub-objectives and measurable outcomes identified in table 6.1 into the Forest Practices Code. Reporting on progress should be formally linked to Forest Practices Authority annual reporting and/or to State of Forest reporting as appropriate. (chapter six, table 6.1). Further development and quantification of several sub-objectives identified in table 6.1 [in particular those identified by the panel as requiring further development and consultation] should be carried out by the Forest Practices Authority, in consultation with stakeholders so that implementation is practical and measurable. The panel consider that the consultation process should not be used to delay implementation of the measurable objectives.</i>	<p>Agreed for those sub-objectives and measurable outcomes already finalised by the Panel in Table 6.1. These are marked with an *3 and the panel considered the performance indicators to be sufficiently robust to be implemented immediately.</p> <p>Agreed in principle - for those the Panel identified requiring further development. FPA to convene a group to further consider, develop and quantify the measurable objectives provided in table 6.1 requiring further development. As noted in the recommendation, it is important that this should be carried out, <i>“in consultation with stakeholders so that implementation is practical and measurable”</i>.</p>	See response for A.Rec 5	<p>See response for A. Rec 5.</p> <p>The FPA has produced a guiding policy that sets out the contribution of non-reserve forests under the forest practices system to broader biodiversity conservation outcomes.</p>

		Category 5 <i>Matters relating to the Forest Practices Code - requiring further consideration as part of the current Code review</i>		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
25	<i>In order to maintain structural diversity in the forests, no more than 15% of the native forested area of any CFEV catchment should be harvested by clearfell burn and sow methods in any 10 year period. (chapter four, chapter six, table 6.1)</i>	<p>For recommendations 25,26, 30, 39 and 40 below the alternative view is:</p> <ul style="list-style-type: none"> • they should all be agreed; • that there is a degree of urgency; and • that the need for careful consultation should not delay moves to implementation. <p>The 15% threshold is needed to ensure that particular catchments are sustainably managed. The panel has provided evidence that some catchments have had 40% clearfell and conversion to plantation in a 9 year period.</p>	See response for A. Rec 25	See response for A. Rec 25

		Category 5 <i>Matters relating to the Forest Practices Code - requiring further consideration as part of the current Code review</i>		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
26	<i>Aim to maintain at least 30% of native vegetation (e.g. 30% cover or basal area) with a focus on trees with mature and old growth elements currently available at all four spatial scales. (chapter four, chapter six, table 6.1)</i>	As Above Agreed in principle	See response for A. Rec 26	See response for A. Rec 26
30	<i>The Forest Practices Authority should develop water-specific planning tools to maintain a proportion of unharvested headwater catchments and to maintain the spatial and temporal integrity of longitudinal and lateral connections of river headwater networks. These planning tools should take a flexible approach and the proportion of catchment required may be achieved as part of the CCU planning aim to maintain 30% of native vegetation. The effectiveness of the measures applied need to be monitored and the measures need to be further developed through research. (chapter four, chapter six, table 6.1)</i>	As Above	See response for A. Rec 30	See response for A. Rec 30. No further action by the FPA. Water-specific planning tools are being progressed by DPIPW. E.

		Category 5 <i>Matters relating to the Forest Practices Code - requiring further consideration as part of the current Code review</i>		
Rec No.	Recommendation	Alternative views by some members of FPAC	Preliminary Response of FPA to recommendations	Progress/actions at March 2015
39	<i>That the Forest Practices Code encourages the move away from reliance on large and extensive clearfell burn and sow (CBS) harvesting systems in native forests and that maximum CBS coupe size should generally not exceed 60 ha. Where coupe sizes need to be larger (e.g. for safety and fire management considerations or to avoid adverse environmental outcomes) the reasons should be explicitly stated. (chapter four, chapter 6, table 6.1)</i>	As above	See response for A. Rec 39	See response for A. Rec 39
40	<i>That the Forest Practices Code incorporate provisions on the size and dispersal of coupes in relation to both plantations and native forest to ensure the maintenance of structural diversity at multiple spatial scales. (chapter four)</i>	As Above	See response for A. Rec 40	See response for A. Rec 40

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