To Dr Neil Byron,

Feedback on the Draft PC report into Native Vegetation and Biodiversity Regulations

The report seemed particularly valuable in the way it surveyed the various pieces of legislation and the way they all fit together. It is a great benefit to have the PC available for such a task, and it may be the only organisation capable of carrying it out. Overall the report seems good insofar as I am able to judge.

Since my time to review the document was limited I concentrated on Tasmania (H), about which I know most, and things about which I might be able to make useful comment.

In my own mind the differing attitudes of the various Municipal Councils has a large contribution to some of the issues, and whether or not they are contentious. In addition, there is a large number of Councils for a small State, even though the number was drastically reduced not that long ago. But this did not come across in Chapter H. I am not sure how relevant this is in the context of the report.

Skill training is very important and when I have sat in on meetings discussing audits of FPP, or looked at coupes in the field, the impression I had was that more skill training would help enormously. There doesn't have to be a lot, provided that it is focussed and appropriate. In plain words, beginner operators in the field don't know what to do in the field, and this can be important. They need someone with experience to show them, and to give constant feedback.

The latest edition of **the FPC was conditional**, we were told on its release. Research had to be carried out on various aspects to determine if the regulations in the FPC were effective, or not e.g. some aspects relating to streamside reserves. I would be interested to hear the results of any research and the implications for the FPC.

The comment on **'economic and social factors'** (last para, p.455) is worthy of mention. When the FPC was first proclaimed there were some plantations already established in what would now be considered streamside reserves. The view was that owners had the legal right to harvest this wood, provided that they did not damage the streamside in doing so, i.e. they should use equipment with a long reach. They were entitled to replant these areas and were strongly encouraged to do so, but with native species. However they would not be entitled to carry out any subsequent logging.

Also in the paragraph on page 455 is a statement

"There is also a requirement that assessment of FPPs consider the impacts of the proposal on soils, water, flora, fauna cultural heritage and visual landscape. Exactly how this is to be considered is not made clear"

I believe that this statement needs revisiting. Are you referring to approval of FPP prior to harvesting; or to subsequent audit? The Forest Practices Officer is supposed to take these things into account by preparing the plan following an extensive check list covering all these topics. The approving officer must have done a 12 day training course in this procedure and must have 5 years relevant experience before he or she is eligible to train. The FPP must show clear evidence that all the relevant aspects have been considered.

One would expect that, in a draft report, the **Glossary** would need updating a bit, and so it does. In the Tasmanian Chapter I picked up some missing viz. FP, page 435; FPC, 437; FPB, 438; FPP, 437; FPS, 436; NLWRA, 435; LUPA, 436; TSP, 436.

There was a typo in PPMS, pages 440, 441, 448; and I am still wondering about TSBC, 449.

The effectiveness of the report would be enhanced by the use of graphics i.e. maps; charts; photographs; and flowcharts to show how the legislation fits together. As I write I am thinking of the CSIRO report *Australia State of the Environment 2001*.

It is difficult for Commissioners, highly skilled in abstract concepts, to understand how ordinary people struggle to get engaged in a document which is essentially a wall of text. We are like Argives circling the city walls of Troy, trying to find a way in. Graphics are like portals which help us get involved.

Regards

Geoff Dean
TAS