Date : 26/02/2013 10:12:34 AM
From : "Harris Leigh"
To : "Jacobi Jason" , "Cambourn Neil"
Cc : "Brittingham Geoff" , "Murphy Rob" , "Allan Rob" , "Newman James" , "Blinkhorn Raymond"
Subject : Approval of harvesting operations in State Forests
Jason / Neil
Amended brief as requested - I have incorporated comments from Ray and yesterdays discussion.
L

For discussion at the DAFF / QPWS Operational Meeting 27 February.

Subject: Approval of harvesting operations in State Forests

Recommendation

- Policy direction is required for harvesting regimes to be applied on State Lands, particularly State Forests.
- That harvesting regimes for such areas be appropriate to the forest type and forest structure and be based on sound ecological principles and involve acceptable impacts on the environment, unless predetermined by State Government policy.

Background

- Minister McVeigh has approved that the areas of State Forests previously excluded from further harvesting by the former State Government, as well as the State Forest areas proposed for tenure transfer to the protected area estate, are now available for commercial log timber production and associated harvesting.
- QPWS is required to review and approve Operational Harvest Plans (OHP) to cut timber in State Forests.
- Some recent OHPs received from DAFF proposed to cut down to 30cm DBH+ for landscape and 40cm DBH+ hardwood timber.
- In some cases this may be considered appropriate e.g. at Callide Timber Reserve the harvest will ensure maximum use of the timber resource prior to clearing for mining purposes.
- However for other areas concerns have been raised by QPWS assessing officers that the proposed harvesting regime (30cm and 40cm DBH+) will remove unsustainable levels of merchantable timber on reserves dedicated for future timber production.
- All harvesting on QPWS estate must be sustainable as a basic principle of the current Code of Practice and the cardinal principle of the *Forestry Act 1959*.
- The Draft MOU indicates that timber harvesting operations will be administered between the departments in accordance with the Operating Guidelines. However, harvesting should be conducted in accordance with State Policy, the *Code of Practice for Native Forest Timber Production on State Lands* and its subordinate *Operating Guidelines for Native Forest Timber Production on State Lands*.
- QPWS can approve alternatives to established harvesting regimes subject to Code considerations.
- DAFF may propose alternative harvesting regimes (e.g. intensive harvesting) for consideration by QPWS provided QPWS does not compromise other code standards and are consistent with broader Government policy.
- While no formal agreement exists QPWS is obliged to operate within the Forestry Act where section 33 states "*The cardinal principle to be observed in the management of State Forests shall be the permanent reservation of such areas for the purpose of producing timber and associated products in perpetuity and of protecting a watershed therein.*"
- There is no current (government) policy or instruction on harvesting regimes for any of the State's forest areas. The Code provides for a default single tree selection harvesting regime (thinning regime maintaining species composition with optimum stocking and spacing of the best-formed and most vigorous trees of the most desirable species). More intensive harvesting regimes were previously authorised under the SEQ Forest Agreements and Western Hardwoods arrangement.
- Assessing officers require clear direction and certainty when dealing with harvesting regime assessments.
- In new areas dedicated for future timber production assessing officers are recommending that a minimum girth cut of 70cm with a thinning down to 40cm for all harvest plans (based on previous forest practice and SEQFA part A areas). This minimum could be reduced for some poorer quality forests.

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Date : 15/02/2013 12:22:14 PM
From : "Harris Leigh"
To : "Brittingham Geoff" , "Murphy Rob" , "Newman James" , "Allan Rob"
Cc : "Jacobi Jason" , "Cambourn Neil"
Subject : Approving harvesting operations

Hi - for consideration and comment by 22 February.

Some recent OHPs received from DAFF proposed minimum diameter cutting regimes which may not be sustainable. It is my understanding that there is no policy or instruction for the approval of harvesting on any forest areas outside of SEQFA and Western Hardwoods agreements.
It is important to give our assessing officers certainty (even if they don't agree with resulting cutting regime) in dealing with such issues. An agreed position is required ASAP to ensure timely assessment of OHPs by QPWS.

Not sure if I got my head around this correctly so I would welcome your views.

cheers, Leigh

For discussion at the DAFF / QPWS Operational Meeting 25 February

Recommendation

- Policy direction is required for the approval of harvesting operations on State Forests outside of those committed under the SEQFA and Western Hardwoods.

Background

- QPWS is required to review and approve Operational Harvest Plans (OHP) to cut timber in State Forests.
- Some recent OHPs received form DAFF proposed to cut down to 30cm DBH+ for landscape and 40cm DBH+ hardwood timber.
- In some cases this may be considered appropriate e.g. at Callide Timber Reserve the harvest will ensure maximum use of the timber resource prior to clearing for mining purposes.
- However for other areas concerns have been raised by QPWS assessing officers that the proposed harvesting regime (30cm and 40cm DBH+) will remove unsustainable levels of merchantable timber on reserves dedicated for future timber production.
- All harvesting on QPWS estate must be sustainable as a basic principle of the current Code of Practice and the cardinal principle of the *Forestry Act 1959*.
- The Draft MOU indicates that timber harvesting operations will be conducted in accordance with the Operating Guidelines.
- QPWS is the agency that approves the harvesting regime.
- DAFF may propose alternative harvesting regimes (e.g. intensive harvesting) for consideration by QPWS provided QPWS does not compromise other code standards and are consistent with broader Government policy.
- The Code is subordinate to higher order government 'forestry policy" processes such as SEQFA and Western Hardwoods where cutting regimes and forest availability are more aligned to government requirements for industry.
- While no formal agreement exists QPWS is obliged to operate within the Forestry Act where section 33 states "*The cardinal principle to be observed in the management of State Forests shall be the permanent reservation of such areas for the purpose of producing timber and associated products in perpetuity and of protecting a watershed therein."*
- At this time QPWS can approve 40+ harvesting of Class 'B' MUIDs in SEQFA and 70+ harvesting of 'A' class MUIDS in SEQFA once all 'B' class MUIDs are exhausted and 30+ MUIDs included in the Western Hardwoods Agreement area.
- There is no policy or instruction for the approval of harvesting on any forest areas outside of these agreements.
- Assessing officers require clear direction and certainty when dealing with harvesting regime assessments.
- In new areas dedicated for future timber production assessing officers are recommending that a minimum girth cut of 70cm with a thinning down to 40cm for all harvest plans. This minimum could be reduced for some poorer quality forests.

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Date : 15/03/2013 3:22:12 PM
From : "Young Andrew"
To : "Cubis Mick" , "O'Malley Martin"
Cc : "Healy Ross" , "Henry Stuart" , "Rogers Darren" , "Naske Peter" , "Blinkhorn Raymond" , "Brittingham Geoff"
Subject : cannot approve Part A harvests
Attachment : Copy of 5113_2012.pdf;

Hi Mick & Martin,

I have just spoken with Ross Healy about some of the discrepancies in DAFFs 51.13 Part A Harvesting Rules (attached with my comments). I believe some of these highlighted discrepancies are contrary to their sustainability charter and the Code. I believe these need to be resolved prior to approving any Part A MUIDs.

I have now come to the position where I believe I do not have the authority to approve these harvest operations as I have not received any instruction as to the harvesting regime to be applied. The DG to DG letter has shown, via the Ministerial endorsement, that these Part A areas are now available for harvest. But there are no instructions as to what harvest regimes are to apply.

My reasoning for not approving Part A Harvest Plans is based on the following logic and authorities:

- The DG-DG Letter now authorises timber harvesting of Part A MUIDs in the SEQFA (DG-DG Letter, 16/01/13, paragraph 2, 5)
- But under the SEQFA, these Part A MUIDs were to be harvested on a 70+ regime with stems thinned on a spacing basis beneath this (SEQFA 2.13)
- The SEQFA did not allow for any other harvest regimes to be applied and the DG-DG letter did not state that the QPWS or DAFF Ministers had specified any
- At the moment, if I were to approve operations to any other than a 70+ regime I believe I would be in breach of the SEQFA and the Forestry Act, as no alternative to the SEQFA has been approved by the equivalent government levels.
- I am left with no option but to not approve any Part A harvest operations until I have been advised what harvest regimes are to apply to these areas in the SEQFA

In addition to Part A MUIDs, I have had no instructions regarding future harvest regimes to be applied to the former 'ARCS' MUIDs in the Western Hardwood (30+) area or other reinstated forests in SEQFA and other QPWS regions. One would assume that, in the absence to any authority to the contrary, the 30+ areas would continue to be harvested at 30+ and the 40+ areas would continue to be harvested at 40+. I have been approving new harvest plans on this basis. But if we are entering into a sustainable harvesting cycle (as indicated in the DG-DG Letter, 16/01/13, paragraph 3), then 30+ or 40+ regimes are not sustainable in any meaningful way and need to be replaced.

Based on the governmental authorisation levels of the SEQFA, I do not believe DAFF have the authority to choose any harvesting regime they wish. To be valid, I believe authority to do this would need to come from at least the Ministerial level. This would need to include endorsement from the NPRSR Minister (as custodian of State forests) to replace the authority of the SEQFA and Western Hardwoods Resource Review agreements.

I would suggest that this issue (of what harvesting regime is applied to Part A and other areas) be escalated up to our DG to request clarification from the NPRSR Minister. If the NPRSR and DAFF Ministers agree that a 60+ regime is suitable, well and good. If they also state that DAFF now have the authority to specify the harvesting regime based on what is sustainable for the forest in question, then we can certainly work with that as well.

Regards,

Andrew Young
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FOREST PRODUCTS PERSPECTIVE ON CODES OF PRACTICE
FOR NATIVE FOREST TIMBER PRODUCTION
Discussion Paper

1. PURPOSE

The purpose of this Discussion Paper is to trigger discussion between Forest Products and QPWS on key issues concerning the review of the *Code of Practice for Native Forest Timber Production on State Lands 2007*.

2. FOREST AND TIMBER INDUSTRY CONTEXT

The Queensland Government's priorities include a commitment to secure and develop the Queensland forest and timber industry. To this end, as part of the Government's various action plans, it resolved to develop and implement a forest and timber industry plan.

In December 2012 the joint working group comprising Timber Queensland, DAFF, other key industry stakeholders presented the *Queensland Forest and Timber Industry Plan* to the Minister Agriculture, Fisheries and Forestry. The Plan's underlying imperatives includes enhanced access to resources, reduced regulation, increased efficiencies and reduced production costs towards improving competitiveness and industry investment.

Codes of practice are important to Government and an important element of the Plan. Action 6.2 of the Plan states a *Maintain high standards of environmental and workplace safety as expressed in approved codes of practice for forest management* (underline is author's emphasis).

Codes are also important to Forest Product's Forest Management System and Australian Forestry Standard certification which serves timber industry Chain of Custody certification.

3. ENVIRONMENTAL CODES FOR NATIVE FORESTS

The environmental management standards applying to native forest timber production are addressed by two codes:

- on State Forests and other State Lands — the *Code of Practice for Native Forest Timber Production on State Lands 2007* (hereafter referred to as the QPWS Code). Historically QPWS has applied the QPWS Code to Forest Product's forest harvesting operations to give effect to its custodial responsibility for native forests under the Forestry Act; and
- on freehold land — the *Code Applying to a Native Forest Practice on Freehold Land* (hereafter referred to as the Freehold Code). Landholders must comply with the Freehold Code to undertake a native forest practice under the Vegetation Management Act.

The environmental outcomes achieved by both Codes are essentially the same, given the common expertise and technical input underpinning development of the Codes. Whilst the QPWS Code served as a model for the development of the Freehold Code, the prescriptions of the Freehold Code were made simpler to serve self-application and assessment by landholders (and the harvesting contractor), without compromising environmental outcomes. This is most evident with the watercourse protection provisions of the Freehold Code. The QPWS Code remains more complex and highly prescriptive.

4. QPWS CODE REVIEW

The QPWS Code states a commitment that it will be reviewed after 5 years. The initial edition of 2002 was reviewed in 2007, giving rise to the 2007 edition that remains current.

The expectation of Forest Products and industry is that the 2007 edition of the QPWS Code will be reviewed in line with the 5 year schedule.

Commented [AEY1]: QPWS need to be careful when DAFF starts to 'interpret' words used in guidelines and Codes. They have a history of applying a new interpretation to the text to suit themselves. This is why DAFF moved so far from the intent and agreed definitions in Watercourse Protection (Schedule 3) that in 2010 resulted in joint field meetings to resolve several re-interpretation issues.

The implicit assumption here is that the current Code is not "approved" because it has not been reviewed. However, the 2007 Code stands until this is completed.

The context of Action 6, within Strategic Priority 3 – Forest resource, is one of "increas(ing) the current timber output." This sets the framework for most of DAFF statements in this paper.

Interesting that they didn't quote Action 8.1 that speaks about the "adoption of best practice native forest management."

Commented [AEY2]: This will be addressed in comments on Issue2. But note that here DAFF states that the two codes are essentially the same wrt environmental outcomes.

Commented [AEY3]: This statement is only partly correct. What has been left out is that this "simpler" introduction was to make it easy for (technically untrained) landholders to initially comply with *and* because the freehold code was voluntary. The intent was always that, as time went on, and landholders became familiar with it, that the freehold code would move in line with the State code.

Commented [AEY4]: Note again the statement that environmental outcomes will not be compromised.

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QPWS commenced a review process in 2012 to meet the review schedule. QPWS intended to complete the review process by July 2012. Several meetings were held between QPWS and Forest Products officers to negotiate changes to the Code. Agreed changes mainly addressed improved wording and clarification, and removing out of date references. Note that the QPWS premise was to refine what was already in the Code, rather than entertain fundamental changes to the basic 'construct' of the Code.

Despite the good start by both parties to review the QPWS Code, MoG changes and other priorities overtook the review process during latter 2012, and the process stalled. Significant changes in government policy have occurred over this period.

As a result, a revised QPWS Code has not been finalised and approved for implementation.

5. DISCUSSION

Listed below are issues that Forest Products would like to advance for further consideration in the QPWS Code review process. The issues raised are predicated on a desire that fundamental changes and efficiencies should be now canvassed in the review, given more clarity in relation to Government priorities, and mandates and resourcing of agencies.

A copy of latest draft of the Code is attached to accompany this Paper. This version:

- incorporates changes to the 2007 Code agreed between QPWS and Forest Products as part of the earlier review process. These changes are not marked up/evident;
- some wording changes suggested by QPWS or Forest Products that have yet to be agreed, shown as tracked changes; and
- reinforces main issues that Forest Products is advancing in this paper, as described below.

Also note that on-going internal consultation within Forest Products continues to raise the same impediments to efficiencies that require serious consideration for change.

Issue 1. The Code review process to date has been discussed in Section 4. It is desirable that the Code review be reactivated in order to finalise a new Code. The reactivated process should build on the progress made so far, particularly the agreed changes reflected in the latest draft. It is also desirable that fundamental changes to the content and operation of the QPWS Code be considered and implemented as part of the review process.

Commitment to reactivate the QPWS Code review should also embrace associated and required review of the Operating Guidelines for Native Forest Timber Production on State Lands as a follow up process, as the Guidelines supports the Code.

For joint discussion: Confirmation that QPWS will recommence a joint team process to review the Code, with established milestones and timeframe, and with scope for examination of fundamental changes to the Code arrangements than hitherto considered.

Issue 2. Portfolio responsibilities for the Minister National Parks, Recreation, Sport and Racing, as presented in the Administrative Arrangements Orders (No. 4) 2012, include 'custody and management of State Forest not part of the plantation licence agreement'. Implicit to the Administrative Orders is that QPWS has jurisdiction over State Forest, but not other State lands. The responsibility for the management and use of State land is with the Minister for Natural Resources and Mines through DNRM.

QPWS can no longer require the adoption of the QPWS Code on other State lands where QPWS has no jurisdiction.

Commented [AEY5]: It was actually started in May 2011.

Commented [AEY6]: Rather, if fundamental changes were necessary, then a better environmental outcome had to be demonstrated. This was the 'standard' for assessing any proposed change.

Commented [AEY7]: The process stalled because DAFF walked away from any further discussions because QPWS would not agree to a few of their specific proposed changes. It should be noted that (I would estimate) about 80% of DAFFs suggestions were accepted.

Commented [AEY8]: Most of these changes are to do with government direction not on environmental standards. As such, there is very little impact on the NFTP code.

Commented [AEY9]: Note the emphasis on "approved" again. QPWS has the authority to "approve" the State code, after consultation, not DAFF!

Commented [AEY10]: Note that these "same impediments" have been requested by QPWS since Nov 2012 when QPWS was 1st advised of them and have not been supplied until now.

Commented [AEY11]: Again, if there any "fundamental changes" that QPWS is unaware of, as long as there is a demonstrated same or improved environmental outcome, these should not be an issue. Note that the previous review did not consider fundamental changes designed to cut DAFF costs, with no demonstration of a same/better environmental outcome, to be a valid reason for such a change.

Commented [AEY12]: This was always QPWS' intent once the code had been finalised.

Commented [AEY13]: As stated above, QPWS was waiting for DAFF to "recommence a joint team process" after they withdrew from the previous review.

Commented [AEY14]: Beware "definitions" again. Attention is drawn to the title of the State code: Code of practice for native forest timber production on **STATE LANDS**. If the government wanted to change the title of the code and its jurisdiction, it could have done so. Your attention is also directed to Section 45 of the Forestry Act 1959. That states in part, "Except where otherwise expressly provided by some other Act ….. the following shall at all times be presumed to be the absolute property of the Crown, unless and until the contrary is proved …(a) all forest products and quarry material on all Crown lands .... (g) commercial species of timber on a lease subject to an agreement between the Minister and a lessee for commercial timber on the land under the Land Act 1994." So, the Forestry Act is **explicitly** called up in relation to Crown lands (including other State lands) and the Land Act, therefore the State Code should apply. Traditionally, the Forestry Act and the State code of practice have always been applied to other State lands. The Forestry Act states that an Act is required to overturn this situation. **QPWS should request proof by DAFF of why and how the freehold code should be applied to other State lands and the legislative mechanism that supports this.** Interestingly, the Land Act states that "the administration of this Act, land to which this Act applies must be managed for the benefit of the people of Queensland by having regard to the following principles—
Sustainability
• sustainable resource use and development to ensure existing needs are met and the State's resources are conserved for the benefit of future generations
Evaluation
• land evaluation based on the appraisal of land capability and the consideration and balancing of the different economic, environmental, cultural and social opportunities and values of the land
Development
• allocating land for development in the context of the State's planning framework, and applying contemporary best practice in design and land management .....
Community purpose
• if land is needed for community purposes, the retention of the land for the community in a way that protects and facilitates the community purpose
Protection
• protection of environmentally and culturally valuable and sensitive areas and feature

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In lieu of the QPWS Code, Forest Products sees advantages in adopting the Freehold Code 'provisions' on other State land[1]. In particular, this would lead to efficiencies to both Forest Products and applicants in conversion of tenure (CoT) applications. Historically Forest Products harvested CoT areas to the QPWS Code prior to conversion, and then assessed and billed the applicant for any residual log volume that might be removed by the landholder under the Freehold Code following freeholding. The adoption of the Freehold Code provisions would eliminate this complicated procedure which imposes additional costs on Forest Products and is frustrating and more expensive for CoT applicants. The approach also improves alignment with other vegetation management requirements for management of non-remnant and category X vegetation.

Forest Products would need to seek agreement from DNRM for the adoption of the Freehold Code provisions in all situations.

For joint discussion: Prior to discussions with DNRM, QPWS views on environmental standards to be applied to harvesting on other State lands, including Forest Products proposal to adopt the provisions of the Freehold Code.

Issue 3. With organisational changes within QPWS the resourcing of QPVVS auditing under the QPWS Code is unclear to Forest Products. Forest Products has been told that the QPWS audit staff are being allocated additional responsibilities.

Audits against the QPWS Code are a key part of Forest Product's Forest Management System and the Government's commitment to responsible forest management.
Also refer Issue 10.

For joint discussion: Forest Products would like confirmation that audits will be programmed for State forests and that auditing will be appropriately resourced using professional audit methodologies, including the use of appropriately skilled QPWS personnel with knowledge and expertise in native forest timber production.

Issue 4. The QPWS Code references Species Management Profiles (SMPs) that outline protective measures for EVNT species. SMPs can be viewed as subordinate documents that support the QPWS Code. The updating of SMPs is long outstanding. Two years ago QPVVS provided a commitment to update the 70 SMPs relevant to native forest harvesting. Forest Products is aware of some work that has been done by QPWS on the koala and frog SMPs, but despite this, there is currently no SMP that is up to date.

The SMPs should retain the option of adaptive management measures. Also many of the SMPs portray harvesting as a threatening process. This needs reassessment given harvesting disturbance actually promotes certain species.

For joint discussion: If SMPs are to remain relevant to the QPWS Code, how is their review and updating going to be resourced by QPWS? Past commitment by QPWS has failed to deliver and Forest Products is willing to consider more innovative, perhaps joint approaches to resourcing SMP reviews.

Issue 5. The QPWS Code contains subject matter that is addressed by other codes or commercially derived procedures which are distinct from environmental management.

For instance, Section 3 is concerned with Worker and Public Safety. These matters are addressed by a separate code — the Forest Harvesting Code of Practice 2007. The QPWS Code should not address safety.

[1] The Freehold Code, as an instrument that applies to a native forest practice on freehold land under the Vegetation Management Act, cannot be applied to harvesting operations on State land under the Forestry Act. However the approach being advocated is that the provisions of the Freehold Code apply to State land.

Commented [AEY15]: QPWS should request DAFF to supply the **legislative basis** for application of the freehold code to Crown lands.

Commented [AEY16]: Conversion of tenure harvests are typically a harvest to "nil value" to reduce the bill sent to the applicant.

Commented [AEY17]: This is only part of the story. QPWS has "historically" agreed to a modified Code application to CoT operations to allow logging to "nil value" (or as close as we are comfortable with) and this still applies at present.

Commented [AEY18]: This paragraph **contradicts** the "essentially the same" statements used earlier in Part 3 of this paper! The watercourse protection requirements of the freehold code are **not the same** as the State code – they allow a reduced standard of protection – and access to more timber closer to watercourses by DAFF!

Commented [AEY19]: QPWS should **NOT** agree to any of this as it would require an Act (according to S45 or the Forestry Act) or some very high-level government agreement.

Commented [AEY20]: Note, that the main reason for this, in my understanding, is that there has been protracted discussions with DAFF that has held the process up.

Commented [AEY21]: QPWS should take care to retain the authority for approving all adaptive management measures.

Commented [AEY22]: The State code states that "The Code is not a substitution or lessening of any other standard, Code or law (1.3)." The State code is concerned with managing native forest timber production and this includes safety and environmental constraints. Section 3 allows the refusal of entry for non-compliance with other safety codes/requirements.

This section emphasises the "duty of care" QPWS and DAFF have in regard to safety. Does DAFF have an issue with this?

Commented [AEY23]: QPWS should request DAFF to supply justification for this request.

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The Freehold Code, as an instrument that applies to a native forest practice on freehold land under the Vegetation Management Act, cannot be applied to harvesting operations on State land under the Forestry Act. However the approach being advocated is that the provisions of the Freehold Code apply to State land.

Forest Products has similar issues with the QPWS Code referencing native title, and 'commercially based' inventory and utilisation standards.

For joint discussion: The focus of the QPWS Code should be solely focused on environmental management. Matters that are addressed by legislation, codes or commercially based procedures that are not relevant to environmental management should be removed from the QPWS Code. This is the approach adopted in the Freehold Code.

Issue 6. Allied to Issue 5, Forest Products believes that the QPWS Code should be more outcome based and less prescriptive where there are several possible 'solutions' or practices that serve the same outcome. Therefore the Code should refrain from giving preference or nominating silvicultural regimes which may be adjusted by Government policy over time. The key matter for the Code is to prescribe residual basal area, habitat tree retention and other outcome-based parameters that silvicultural systems need to address and work within.

Some QPWS operatives are having difficulty accepting that Forest Products is free to nominate 'diameter cutting' (30cm + or 40cm +) over traditional' single tree' selective harvesting. This should not be the issue for QPWS as long as Code outcomes are maintained.

A more outcome based focus would help address certain provisions of the Code that Forest Products is finding restrictive and difficult to meet in every situation e.g. (1) the requirement for at least 50% basal area retention on every hectare, and (2) landing size and road clearing prescriptions that do not cater for the full range of harvesting systems incorporating wider roads and turn arounds.

For joint discussion: Where possible, the QPWS Code should be more focused on environmental outcomes, and less prescriptive. This is the approach adopted in the Freehold Code.

Issue 7. Previous discussions between QPWS and Forest Products have nominated the following changes to arrangements:

- Strategic Harvest Plans will be the mechanism for QPWS to input and alert Forest Products of special forest values applying to a harvest site;
- QPWS will dispense with approval of Operational Harvesting Plans (OHPs), approval only being sought where an aspect of harvesting is outside the provisions of Code; and
- QPWS will continue to audit OHPs.

For joint discussion: Previous discussions between QPWS and Forest Products needs to be confirmed and appropriate wording changes made to the relevant section of the QPWS Code and the associated Operating Guidelines that reflect the changed arrangements.

Issue 8. Schedule 3 of the QPWS Code concerns watercourse protection. This schedule is extremely technical and involves complex decision making on watercourse morphology to derive protection zones.

Joint field days have demonstrated slippage in interpretation of the schedule by both QPWS and Forest Products staff.

The Freehold Code has much simpler watercourse methodology based on stream order.

Forest Products believes that adoption of the watercourse provisions of the Freehold Code to replace existing Schedule 3 would have a number of benefits, including greater efficiency to field application, more ready mapping, more consistent interpretation with less chance of slippage, less on-going training of staff and adopts a common watercourse protection schedule across all tenures (given that Forest Products proposes that the Freehold Code provision be adopted for other State lands — refer Issue 2). Importantly, a simpler watercourse protection schedule would facilitate more efficient and innovative approaches to harvesting that Forest Products wishes to pursue, consistent with the Queensland Forest and Timber Industry Plan e.g. full mechanisation of harvesting.

Commented [AEY24]: Again, DAFF need to support this claim with legislative basis. No proof – no deal!

Commented [AEY25]: As "other State land" is still State land, DAFF need to show why a lesser environmental standard should apply. Community expectation would be most likely to require that protection levels on State lands would be **higher** than on freehold. After all, this is the expectation with management of national parks compared to other tenures!

Commented [AEY26]: This has been corrected in the current review with reference to specific "silvicultural regimes" removed (Schedule 13) and allows for these to be "predetermined by State Government policy." See C8.3.2.

Commented [AEY27]: DAFF are a little off in their interpretation here. The State code prescribes the numbers of habitat and recruitment trees that are to be retained by forest type. DAFF is able to reduce the basal area below 50%, but is then required to add some additional recruitment trees by DBH class. In practice this usually means that the extra trees push the basal area out to just over the 50% again. See Schedule 6.3 and Tables 11 and 12.

Commented [AEY28]: According the code review that DAFF is having so much issue with, DAFF is indeed able to "propose" diameter or girth cutting. (It was not so in the 2007 Code!) However, QPWS is free to approve, not approve or to condition the operation in some way in order to ensure a suitable environmental outcome is obtained.

Commented [AEY29]: Past trials have shown that girth/diameter cutting DOES NOT deliver code compliant outcomes. (Ross/Peter, can you add your comments here?)

Commented [AEY30]: The requirement for habitat tree requirements to apply on every hectare is critical for QPWS to deliver habitat and conservation outcomes from State forests!

Commented [AEY31]: I cannot ever recall having an issue with these aspects in an audit. DAFF are free to request the appropriate landing or road requirements in their harvest plan as they have done in the 4 OHPs Ihave on my desk at the moment.

Commented [AEY32]: Hmmm, I'm beginning to see a pattern here…..why should this code apply to State lands…..?

Commented [AEY33]: These issues were not discussed as part of the previous code review despite what is stated here. All previous discussions refer to OHPs needing to be approved. A Log of Changes can be supplied to support this. Suggest QPWS require DAFF to demonstrate how this change would produce an equal or better environmental outcome.

Commented [AEY34]: "Slippage" may refer to DAFFs re-interpretation of code definitions to make more timber available.

Commented [AEY35]: The freehold code uses a "**modified**" stream order sometimes called a "blue line" stream. These are the blue stream lines drawn on a 1:250k topo map. The State code uses field assessment - attribute-based techniques to determine watercourse type and then protection levels. The approach used by the freehold code fails to pick up **6 classes of watercourse that are smaller** than a Stream 2 from the State code which would correspond to a blue line on a 1:250k map. These would recieve reduced protection under the freehold code.

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For joint discussion: QPWS views on the adoption of the watercourse protection provisions of the Freehold Code to replace the existing Schedule 3 of the QPWS Code.

Issue 9. The QPWS Code references the QPWS Cultural Heritage Management Information System. It is noted that the System does not appear to be available on the DNPRSR website.

For joint discussion: Does QPWS intend to maintain the Cultural Heritage Management Information System and make it accessible to other agencies? If not, it should not be referenced in the Code.

Issue 10. A commercial operator/regulator model underpinned the initial 2002 edition of the QPWS Code, the commercial operator being DPI Forestry as a commercialised business group, regulated by then DNR. The result was a relationship between DPI Forestry and DNR operatives that was somewhat 'polarised'.

The placement of both QPWS and Forest Products in the same department (DERM) was positive to a closer relationship between the two parties.

The environmental credentials of Forest Products has also become more transparent. Forest Products maintains certification to the Australian Forestry Standard as a demonstration of the integrity of its forest management system to address all forest values, including ecological sustainability. Forest Products certification serves as a platform for timber processors to adopt Chain of Custody certification, enabling them to promote their timber products as being sourced from sustainably managed forests.

The QPWS Code and supporting approval/audit processes can (and should) be viewed as a component of this forest management system, thereby contributing not only to sustainable forest management outcomes but also broader industry outcomes.

As mentioned in Section 2 above, the Qld Forest and Timber Industry Plan captures code of practice as being relevant to timber industry outcomes.

Forest Products believes that greater recognition should be given to this 'connection', and that an even more mature 'partnership' between QPWS and Forest Products should now underpin the QPWS Code and protocols, and build on the closer working relationship achieved in recent times. The following is a simple example of a greater partnership approach. In the past Forest Products has had no input into QPWS audit programs. Regional Forest Products staff have been given limited notice of audits and no explanation as to why sites have been chosen for auditing.

Under a partnership model, QPWS auditors and Forest Products would meet at the commencement of the audit year, to allow audit results from the previous year to be jointly reviewed, together with other information including Forest Products internal audits and views on focus areas for auditing. The objective would be to agree on an audit schedule, which locations (forest type x permittee) would be audited, and what aspects of the Code deserve more attention. Audit efforts would be more focused on the issues — those aspects of the Code that have historically high compliance would be audited less intensively. This is considered a more professional audit approach reflective of Forest Products experience with AFS auditors.

For joint discussion: QPWS views on an enhanced partnership model to underpin the QPWS Code.

****

Prepared by:

- David Ward, Manager Sustainability and Operations Policy, Central Office
- Brad Petersen, Manager Timber Production, SE FMA
- Stuart Olive, Manager Timber Production, North FMA
- Simon Cottier, Senior Policy Officer, Sustainability and Operations Policy, Central Office

February 2013

Commented [AEY36]: QPWS should request DAFF to demonstrate (1) how the freehold code watercourse protection requirements will provide the same or better environmental outcome; and (2) what is the legislative basis for QPWS to apply a freehold code to State lands and State forests.

Commented [AEY37]: This sounds very reasonable and a worthy goal. However, it is based on some assumptions that do not stand up when exposed to closer scrutiny. **Firstly**, DAFF have highlighted their initial commercial focus but have neglected to mention that it is still so. DNR-then QPWS, as the environmental regulator, was put in place to make sure harvesting was carried out in accordance with appropriate environmental standards- the standard checks and balances approach - to protect the government from risk. This dichotomy still exists and we should not expect agreement on all points. Philosophically DAFF wants to extract more timber and QPWS wants to limit timber removal to comply with prescribed codes and standards. We will not agree in all cases.
Secondly, it assumes that all parties have an equal contribution and neither has the "power" to dictate.
Thirdly, it assumes that all parties are non-biased and act in a professional manner as required by the public sector code of practice.

Commented [AEY38]: Not the case at all. QPWS audit procedural guide states that a minimum of 2 weeks notice is required unless otherwise agreed. A spot audit can occur if an auditor has time when travelling past a harvest operation. In SEQFA we have tried to give more than 4 weeks notice.

Commented [AEY39]: All sites are available for audit, but this does not mean QPWS has to audit them all. An auditor might seek evidence for one aspect of the code at one site and evidence for another aspect at another site.

Commented [AEY40]: This approach was presented by the previous DAFF Manager SE FMA during the 2009 review of the Operating Guidelines. It was rejected then as it was seen as a means for DAFF to skew the audit process in their favour. Otherwise, DAFF would know where they need to apply the code and where they don't have to do so!

Commented [AEY41]: This is the case now, although we still "cast an eye over such issues" just in case.

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Date : 11/03/2013 9:37:55 AM
From : "O'Malley Martin"
To : "Brittingham Geoff"
Subject : FW: Comments on DAFF Discussion paper
Attachment : DAFF Discussion Paper-QPWS Comments v1.01.doc;

Geoff,

FYI. I haven't had a chance to read through it but Andrew has highlighted his comments clearly.

Are we still planning to have a session to discuss the Audit and harvest program? Also is there a deadline to get comments on the discussion paper back to the committee?

I will have a look through this later.

Regards

Martin

Martin O'Malley
Senior Ranger
Sunshine and Fraser Coast Region
Queensland Parks & Wildlife Service
12, 1st Avenue, Maroochydore, 4558
Ph: 5459 6168

From: Young Andrew
Sent: Monday, 4 March 2013 4:07 PM
To: O'Malley Martin; Cubis Mick
Subject: FW: Comments on DAFF Discussion paper

Hi Martin and Mick,

I have attached some comments on the DAFF Discussion Paper for your info. I know there is a lot there but I am concerned that QPWS will agree to something that will come and bite us later.

As you can see, I have also sent it to the old SREM team for comments. So I will keep you posted on any updates/corrections.

Cheers,

Andrew Young

Senior Ranger — Ecosystem Management | Estate Management — Sunshine & Fraser Coast Region
Queensland Parks and Wildlife Service | Department of National Parks, Recreation, Sport and Racing
Tel: 07 5489 0911
Mob: sch4p4(6) Person
Fax: 07 5482 8755
Email: andrew.young@nprsr.qld.gov.au

From: Young Andrew
Sent: Monday, 4 March 2013 4:05 PM
To: Blinkhorn Raymond; Healy Ross; Henry Stuart; 'Peter Naske'; Rogers Darren
Subject: Comments on DAFF Discussion paper

Hi Colleagues,

I have commented at length on DAFFs Discussion Paper. Could you please have a look at what I have said and correct any ramblings or rantings and add your own astute comments.

I will forward this up to Martin O'Malley and Mick Cubis so my region is aware of what is going on in the meanwhile.

- DAFF seem to want QPWS to "approve" all their requests instead of presenting arguments/proof to back up their statements. This shifts the "burden of proof" and the risk to QPWS.
- DAFFs comments on why the freehold code should apply to other State lands is very circuitous. In fact the Forestry Act says that it applies to forest products on all Crown land. I have suggested that QPWS simply request the legislative basis for applying the freehold code on other States and State forests.
- In some claims they have misinterpreted the code and in others made seemingly false statements

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I believe QPWS should tread very carefully!

Cheers,

Andrew Young

Senior Ranger — Ecosystem Management | Estate Management — Sunshine & Fraser Coast Region
Queensland Parks and Wildlife Service | Department of National Parks, Recreation, Sport and Racing
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FOREST PRODUCTS PERSPECTIVE ON CODES OF PRACTICE
FOR NATIVE FOREST TIMBER PRODUCTION
Discussion Paper

1. PURPOSE

The purpose of this Discussion Paper is to trigger discussion between Forest Products and QPWS on key issues concerning the review of the *Code of Practice for Native Forest Timber Production on State Lands 2007*.

2. FOREST AND TIMBER INDUSTRY CONTEXT

The Queensland Government's priorities include a commitment to secure and develop the Queensland forest and timber industry. To this end, as part of the Government's various action plans, it resolved to develop and implement a forest and timber industry plan.

In December 2012 the joint working group comprising Timber Queensland, DAFF, other key industry stakeholders presented the *Queensland Forest and Timber Industry Plan* to the Minister Agriculture, Fisheries and Forestry. The Plan's underlying imperatives includes enhanced access to resources, reduced regulation, increased efficiencies and reduced production costs towards improving competitiveness and industry investment.

Codes of practice are important to Government and an important element of the Plan. Action 6.2 of the Plan states a *Maintain high standards of environmental and workplace safety as expressed in approved codes of practice for forest management* (underline is author's emphasis).

Codes are also important to Forest Product's Forest Management System and Australian Forestry Standard certification which serves timber industry Chain of Custody certification.

3. ENVIRONMENTAL CODES FOR NATIVE FORESTS

The environmental management standards applying to native forest timber production are addressed by two codes:

- on State Forests and other State Lands — the *Code of Practice for Native Forest Timber Production on State Lands 2007* (hereafter referred to as the QPWS Code). Historically QPWS has applied the QPWS Code to Forest Product's forest harvesting operations to give effect to its custodial responsibility for native forests under the Forestry Act; and
- on freehold land — the *Code Applying to a Native Forest Practice on Freehold Land* (hereafter referred to as the Freehold Code). Landholders must comply with the Freehold Code to undertake a native forest practice under the Vegetation Management Act.

The environmental outcomes achieved by both Codes are essentially the same, given the common expertise and technical input underpinning development of the Codes. Whilst the QPWS Code served as a model for the development of the Freehold Code, the prescriptions of the Freehold Code were made simpler to serve self-application and assessment by landholders (and the harvesting contractor), without compromising environmental outcomes. This is most evident with the watercourse protection provisions of the Freehold Code. The QPWS Code remains more complex and highly prescriptive.

4. QPWS CODE REVIEW

The QPWS Code states a commitment that it will be reviewed after 5 years. The initial edition of 2002 was reviewed in 2007, giving rise to the 2007 edition that remains current.

The expectation of Forest Products and industry is that the 2007 edition of the QPWS Code will be reviewed in line with the 5 year schedule.

Commented [AEY1]: QPWS need to be careful when DAFF starts to 'interpret' words used in guidelines and Codes. They have a history of applying a new interpretation to the text to suit themselves. This is why DAFF moved so far from the intent and agreed definitions in Watercourse Protection (Schedule 3) that in 2010 resulted in joint field meetings to resolve several re-interpretation issues.

The implicit assumption here is that the current Code is not "approved" because it has not been reviewed. However, the 2007 Code stands until this is completed.

The context of Action 6, within Strategic Priority 3 – Forest resource, is one of "increas(ing) the current timber output." This sets the framework for most of DAFF statements in this paper.

Interesting that they didn't quote Action 8.1 that speaks about the "adoption of best practice native forest management."

Commented [AEY2]: This will be addressed in comments on Issue2. But note that here DAFF states that the two codes are essentially the same wrt environmental outcomes.

Commented [AEY3]: This statement is only partly correct. What has been left out is that this "simpler" introduction was to make it easy for (technically untrained) landholders to initially comply with *and* because the freehold code was voluntary. The intent was always that, as time went on, and landholders became familiar with it, that the freehold code would move in line with the State code.

Commented [AEY4]: Note again the statement that environmental outcomes will not be compromised.

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QPWS commenced a review process in 2012 to meet the review schedule. QPWS intended to complete the review process by July 2012. Several meetings were held between QPWS and Forest Products officers to negotiate changes to the Code. Agreed changes mainly addressed improved wording and clarification, and removing out of date references. Note that the QPWS premise was to refine what was already in the Code, rather than entertain fundamental changes to the basic 'construct' of the Code.

Despite the good start by both parties to review the QPWS Code, MoG changes and other priorities overtook the review process during latter 2012, and the process stalled. Significant changes in government policy have occurred over this period.

As a result, a revised QPWS Code has not been finalised and approved for implementation.

5. DISCUSSION

Listed below are issues that Forest Products would like to advance for further consideration in the QPWS Code review process. The issues raised are predicated on a desire that fundamental changes and efficiencies should be now canvassed in the review, given more clarity in relation to Government priorities, and mandates and resourcing of agencies.

A copy of latest draft of the Code is attached to accompany this Paper. This version:

- incorporates changes to the 2007 Code agreed between QPWS and Forest Products as part of the earlier review process. These changes are not marked up/evident;
- some wording changes suggested by QPWS or Forest Products that have yet to be agreed, shown as tracked changes; and
- reinforces main issues that Forest Products is advancing in this paper, as described below.

Also note that on-going internal consultation within Forest Products continues to raise the same impediments to efficiencies that require serious consideration for change.

Issue 1. The Code review process to date has been discussed in Section 4. It is desirable that the Code review be reactivated in order to finalise a new Code. The reactivated process should build on the progress made so far, particularly the agreed changes reflected in the latest draft. It is also desirable that fundamental changes to the content and operation of the QPWS Code be considered and implemented as part of the review process.

Commitment to reactivate the QPWS Code review should also embrace associated and required review of the Operating Guidelines for Native Forest Timber Production on State Lands as a follow up process, as the Guidelines supports the Code.

For joint discussion: Confirmation that QPWS will recommence a joint team process to review the Code, with established milestones and timeframe, and with scope for examination of fundamental changes to the Code arrangements than hitherto considered.

Issue 2. Portfolio responsibilities for the Minister National Parks, Recreation, Sport and Racing, as presented in the Administrative Arrangements Orders (No. 4) 2012, include 'custody and management of State Forest not part of the plantation licence agreement'. Implicit to the Administrative Orders is that QPWS has jurisdiction over State Forest, but not other State lands. The responsibility for the management and use of State land is with the Minister for Natural Resources and Mines through DNRM.

QPWS can no longer require the adoption of the QPWS Code on other State lands where QPWS has no jurisdiction.

Commented [AEY5]: It was actually started in May 2011.

Commented [AEY6]: Rather, if fundamental changes were necessary, then a better environmental outcome had to be demonstrated. This was the 'standard' for assessing any proposed change.

Commented [AEY7]: The process stalled because DAFF walked away from any further discussions because QPWS would not agree to a few of their specific proposed changes. It should be noted that (I would estimate) about 80% of DAFFs suggestions were accepted.

Commented [AEY8]: Most of these changes are to do with government direction not on environmental standards. As such, there is very little impact on the NFTP code.

Commented [AEY9]: Note the emphasis on "approved" again. QPWS has the authority to "approve" the State code, after consultation, not DAFF!

Commented [AEY10]: Note that these "same impediments" have been requested by QPWS since Nov 2012 when QPWS was 1st advised of them and have not been supplied until now.

Commented [AEY11]: Again, if there any "fundamental changes" that QPWS is unaware of, as long as there is a demonstrated same or improved environmental outcome, these should not be an issue. Note that the previous review did not consider fundamental changes designed to cut DAFF costs, with no demonstration of a same/better environmental outcome, to be a valid reason for such a change.

Commented [AEY12]: This was always QPWS' intent once the code had been finalised.

Commented [AEY13]: As stated above, QPWS was waiting for DAFF to "recommence a joint team process" after they withdrew from the previous review.

Commented [AEY14]: Beware "definitions" again. Attention is drawn to the title of the State code: Code of practice for native forest timber production on **STATE LANDS**. If the government wanted to change the title of the code and its jurisdiction, it could have done so. Your attention is also directed to Section 45 of the Forestry Act 1959. That states in part, "Except where otherwise expressly provided by some other Act ….. the following shall at all times be presumed to be the absolute property of the Crown, unless and until the contrary is proved …(a) all forest products and quarry material on all Crown lands .... (g) commercial species of timber on a lease subject to an agreement between the Minister and a lessee for commercial timber on the land under the Land Act 1994." So, the Forsetry Act is **explicitly** called up in relation to Crown lands (including other State lands) and the Land Act, therefore the State Code should apply. Traditionally, the Forestry Act and the State code of practice have always been applied to other State lands. The Forestry Act states that an Act is required to overturn this situation. **QPWS should request proof by DAFF of why and how the freehold code should be applied to other State lands and the legislative mechanism that supports this.** Interestingly, the Land Act states that "the administration of this Act, land to which this Act applies must be managed for the benefit of the people of Queensland by having regard to the following principles—
Sustainability
• sustainable resource use and development to ensure existing needs are met and the State's resources are conserved for the benefit of future generations
Evaluation
• land evaluation based on the appraisal of land capability and the consideration and balancing of the different economic, environmental, cultural and social opportunities and values of the land
Development
• allocating land for development in the context of the State's planning framework, and applying contemporary best practice in design and land management .....
Community purpose
• if land is needed for community purposes, the retention of the land for the community in a way that protects and facilitates the community purpose
Protection
• protection of environmentally and culturally valuable and sensitive areas and feature

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In lieu of the QPWS Code, Forest Products sees advantages in adopting the Freehold Code 'provisions' on other State land[1]. In particular, this would lead to efficiencies to both Forest Products and applicants in conversion of tenure (CoT) applications. Historically Forest Products harvested CoT areas to the QPWS Code prior to conversion, and then assessed and billed the applicant for any residual log volume that might be removed by the landholder under the Freehold Code following freeholding. The adoption of the Freehold Code provisions would eliminate this complicated procedure which imposes additional costs on Forest Products and is frustrating and more expensive for CoT applicants. The approach also improves alignment with other vegetation management requirements for management of non-remnant and category X vegetation.

Forest Products would need to seek agreement from DNRM for the adoption of the Freehold Code provisions in all situations.

For joint discussion: Prior to discussions with DNRM, QPWS views on environmental standards to be applied to harvesting on other State lands, including Forest Products proposal to adopt the provisions of the Freehold Code.

Issue 3. With organisational changes within QPWS the resourcing of QPVVS auditing under the QPWS Code is unclear to Forest Products. Forest Products has been told that the QPWS audit staff are being allocated additional responsibilities.

Audits against the QPWS Code are a key part of Forest Product's Forest Management System and the Government's commitment to responsible forest management.
Also refer Issue 10.

For joint discussion: Forest Products would like confirmation that audits will be programmed for State forests and that auditing will be appropriately resourced using professional audit methodologies, including the use of appropriately skilled QPWS personnel with knowledge and expertise in native forest timber production.

Issue 4. The QPWS Code references Species Management Profiles (SMPs) that outline protective measures for EVNT species. SMPs can be viewed as subordinate documents that support the QPWS Code. The updating of SMPs is long outstanding. Two years ago QPVVS provided a commitment to update the 70 SMPs relevant to native forest harvesting. Forest Products is aware of some work that has been done by QPWS on the koala and frog SMPs, but despite this, there is currently no SMP that is up to date.

The SMPs should retain the option of adaptive management measures. Also many of the SMPs portray harvesting as a threatening process. This needs reassessment given harvesting disturbance actually promotes certain species.

For joint discussion: If SMPs are to remain relevant to the QPWS Code, how is their review and updating going to be resourced by QPWS? Past commitment by QPWS has failed to deliver and Forest Products is willing to consider more innovative, perhaps joint approaches to resourcing SMP reviews.

Issue 5. The QPWS Code contains subject matter that is addressed by other codes or commercially derived procedures which are distinct from environmental management.

For instance, Section 3 is concerned with Worker and Public Safety. These matters are addressed by a separate code — the Forest Harvesting Code of Practice 2007. The QPWS Code should not address safety.

[1] The Freehold Code, as an instrument that applies to a native forest practice on freehold land under the Vegetation Management Act, cannot be applied to harvesting operations on State land under the Forestry Act. However the approach being advocated is that the provisions of the Freehold Code apply to State land.

Commented [AEY15]: QPWS should request DAFF to supply the **legislative basis** for application of the freehold code to Crown lands.

Commented [AEY16]: Conversion of tenure harvests are typically a harvest to "nil value" to reduce the bill sent to the applicant.

Commented [AEY17]: This is only part of the story. QPWS has "historically" agreed to a modified Code application to CoT operations to allow logging to "nil value" (or as close as we are comfortable with) and this still applies at present.

Commented [AEY18]: This paragraph **contradicts** the "essentially the same" statements used earlier in Part 3 of this paper! The watercourse protection requirements of the freehold code are **not the same** as the State code – they allow a reduced standard of protection – and access to more timber closer to watercourses by DAFF!

Commented [AEY19]: QPWS should **NOT** agree to any of this as it would require an Act (according to S45 or the Forestry Act) or some very high-level government agreement.

Commented [AEY20]: Note, that the main reason for this, in my understanding, is that there has been protracted discussions with DAFF that has held the process up.

Commented [AEY21]: QPWS should take care to retain the authority for approving all adaptive management measures.

Commented [AEY22]: The State code states that "The Code is not a substitution or lessening of any other standard, Code or law (1.3)." The State code is concerned with managing native forest timber production and this includes safety and environmental constraints. Section 3 allows the refusal of entry for non-compliance with other safety codes/requirements.

This section emphasises the "duty of care" QPWS and DAFF have in regard to safety. Does DAFF have an issue with this?

Commented [AEY23]: QPWS should request DAFF to supply justification for this request.

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The Freehold Code, as an instrument that applies to a native forest practice on freehold land under the Vegetation Management Act, cannot be applied to harvesting operations on State land under the Forestry Act. However the approach being advocated is that the provisions of the Freehold Code apply to State land.

Forest Products has similar issues with the QPWS Code referencing native title, and 'commercially based' inventory and utilisation standards.

For joint discussion: The focus of the QPWS Code should be solely focused on environmental management. Matters that are addressed by legislation, codes or commercially based procedures that are not relevant to environmental management should be removed from the QPWS Code. This is the approach adopted in the Freehold Code.

Issue 6. Allied to Issue 5, Forest Products believes that the QPWS Code should be more outcome based and less prescriptive where there are several possible 'solutions' or practices that serve the same outcome. Therefore the Code should refrain from giving preference or nominating silvicultural regimes which may be adjusted by Government policy over time. The key matter for the Code is to prescribe residual basal area, habitat tree retention and other outcome-based parameters that silvicultural systems need to address and work within.

Some QPWS operatives are having difficulty accepting that Forest Products is free to nominate 'diameter cutting' (30cm + or 40cm +) over traditional' single tree' selective harvesting. This should not be the issue for QPWS as long as Code outcomes are maintained.

A more outcome based focus would help address certain provisions of the Code that Forest Products is finding restrictive and difficult to meet in every situation e.g. (1) the requirement for at least 50% basal area retention on every hectare, and (2) landing size and road clearing prescriptions that do not cater for the full range of harvesting systems incorporating wider roads and turn arounds.

For joint discussion: Where possible, the QPWS Code should be more focused on environmental outcomes, and less prescriptive. This is the approach adopted in the Freehold Code.

Issue 7. Previous discussions between QPWS and Forest Products have nominated the following changes to arrangements:

- Strategic Harvest Plans will be the mechanism for QPWS to input and alert Forest Products of special forest values applying to a harvest site;
- QPWS will dispense with approval of Operational Harvesting Plans (OHPs), approval only being sought where an aspect of harvesting is outside the provisions of Code; and
- QPWS will continue to audit OHPs.

For joint discussion: Previous discussions between QPWS and Forest Products needs to be confirmed and appropriate wording changes made to the relevant section of the QPWS Code and the associated Operating Guidelines that reflect the changed arrangements.

Issue 8. Schedule 3 of the QPWS Code concerns watercourse protection. This schedule is extremely technical and involves complex decision making on watercourse morphology to derive protection zones.

Joint field days have demonstrated slippage in interpretation of the schedule by both QPWS and Forest Products staff.

The Freehold Code has much simpler watercourse methodology based on stream order.

Forest Products believes that adoption of the watercourse provisions of the Freehold Code to replace existing Schedule 3 would have a number of benefits, including greater efficiency to field application, more ready mapping, more consistent interpretation with less chance of slippage, less on-going training of staff and adopts a common watercourse protection schedule across all tenures (given that Forest Products proposes that the Freehold Code provision be adopted for other State lands — refer Issue 2). Importantly, a simpler watercourse protection schedule would facilitate more efficient and innovative approaches to harvesting that Forest Products wishes to pursue, consistent with the Queensland Forest and Timber Industry Plan e.g. full mechanisation of harvesting.

Commented [AEY24]: Again, DAFF need to support this claim with legislative basis. No proof – no deal!

Commented [AEY25]: As "other State land" is still State land, DAFF need to show why a lesser environmental standard should apply. Community expectation would be most likely to require that protection levels on State lands would be **higher** than on freehold. After all, this is the expectation with management of national parks compared to other tenures!

Commented [AEY26]: This has been corrected in the current review with reference to specific "silvicultural regimes" removed (Schedule 13) and allows for these to be "predetermined by State Government policy." See C8.3.2.

Commented [AEY27]: DAFF are a little off in their interpretation here. The State code prescribes the numbers of habitat and recruitment trees that are to be retained by forest type. DAFF is able to reduce the basal area below 50%, but is then required to add some additional recruitment trees by DBH class. In practice this usually means that the extra trees push the basal area out to just over the 50% again. See Schedule 6.3 and Tables 11 and 12.

Commented [AEY28]: According the code review that DAFF is having so much issue with, DAFF is indeed able to "propose" diameter or girth cutting. (It was not so in the 2007 Code!) However, QPWS is free to approve, not approve or to condition the operation in some way in order to ensure a suitable environmental outcome is obtained.

Commented [AEY29]: Past trials have shown that girth/diameter cutting DOES NOT deliver code compliant outcomes. (Ross/Peter, can you add your comments here?)

Commented [AEY30]: The requirement for habitat tree requirements to apply on every hectare is critical for QPWS to deliver habitat and conservation outcomes from State forests!

Commented [AEY31]: I cannot ever recall having an issue with these aspects in an audit. DAFF are free to request the appropriate landing or road requirements in their harvest plan as they have done in the 4 OHPs Ihave on my desk at the moment.

Commented [AEY32]: Hmmm, I'm beginning to see a pattern here…..why should this code apply to State lands…..?

Commented [AEY33]: These issues were not discussed as part of the previous code review despite what is stated here. All previous discussions refer to OHPs needing to be approved. A Log of Changes can be supplied to support this. Suggest QPWS require DAFF to demonstrate how this change would produce an equal or better environmental outcome.

Commented [AEY34]: "Slippage" may refer to DAFFs re-interpretation of code definitions to make more timber available.

Commented [AEY35]: The freehold code uses a "**modified**" stream order sometimes called a "blue line" stream. These are the blue stream lines drawn on a 1:250k topo map. The State code uses field assessment - attribute-based techniques to determine watercourse type and then protection levels. The approach used by the freehold code fails to pick up **6 classes of watercourse that are smaller** than a Stream 2 from the State code which would correspond to a blue line on a 1:250k map. These would recieve reduced protection under the freehold code.

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- Simon Cottier, Senior Policy Officer, Sustainability and Operations Policy, Central Office

February 2013

Commented [AEY36]: QPWS should request DAFF to demonstrate (1) how the freehold code watercourse protection requirements will provide the same or better environmental outcome; and (2) what is the legislative basis for QPWS to apply a freehold code to State lands and State forests.

Commented [AEY37]: This sounds very reasonable and a worthy goal. However, it is based on some assumptions that do not stand up when exposed to closer scrutiny. **Firstly**, DAFF have highlighted their initial commercial focus but have neglected to mention that it is still so. DNR-then QPWS, as the environmental regulator, was put in place to make sure harvesting was carried out in accordance with appropriate environmental standards- the standard checks and balances approach - to protect the government from risk. This dichotomy still exists and we should not expect agreement on all points. Philosophically DAFF wants to extract more timber and QPWS wants to limit timber removal to comply with prescribed codes and standards. We will not agree in all cases.
Secondly, it assumes that all parties have an equal contribution and neither has the "power" to dictate.
Thirdly, it assumes that all parties are non-biased and act in a professional manner as required by the public sector code of practice.

Commented [AEY38]: Not the case at all. QPWS audit procedural guide states that a minimum of 2 weeks notice is required unless otherwise agreed. A spot audit can occur if an auditor has time when travelling past a harvest operation. In SEQFA we have tried to give more than 4 weeks notice.

Commented [AEY39]: All sites are available for audit, but this does not mean QPWS has to audit them all. An auditor might seek evidence for one aspect of the code at one site and evidence for another aspect at another site.

Commented [AEY40]: This approach was presented by the previous DAFF Manager SE FMA during the 2009 review of the Operating Guidelines. It was rejected then as it was seen as a means for DAFF to skew the audit process in their favour. Otherwise, DAFF would know where they need to apply the code and where they don't have to do so!

Commented [AEY41]: This is the case now, although we still "cast an eye over such issues" just in case.

Published on DNRSI Disclosure Log
RTI Act 2009

Date : 27/02/2013 4:59:09 PM
From : "Brittingham Geoff"
To : "O'Malley Martin" , "Cubis Mick"
Subject : FW: Discussion Paper

Martin/Mick

I have suggest to Neil and Jason that we get all necessary parties, in particular the SREMs, together in the near future to run through current forest policy.

Geoff Brittingham
Regional Director (Sunshine and Fraser Coast)
Queensland Parks and Wildlife Service
Department of National Parks, Recreation, Sport and Racing
6/12 First Avenue, Maroochydore, Qld
PO Box 318, Maroochydore, Qld, 4558
Ph 5459 6112 Fax 5459 6190
Mob sch4p4(6) Pe
Email: geoff.brittingham@nprsr.qld.gov.au

From: Andrew sch4p Young [mailt sch4p4(6) tpg.com.au]
Sent: Wednesday, 27 February 2013 4:42 PM
To: O'Malley Martin
Cc: Brittingham Geoff; Young Andrew
Subject: RE: Discussion Paper

Hi Martin,

In reading this discussion paper, I note 2 things:

1. It "appears" to have been intentionally delivered late to deny QPWS any time to review it before the meeting (QPWS has requested these issues since Nov 2012)
2. It "appears" to include intentional "errors" that at best "skew" information in a positive way for DAFF

Philosophically, one would not expect QPWS and DAFF to agree on every issue. We are coming from very different perspectives. QPWS is trying to ensure environmental standards are maintained on its estate / DAFF are trying to maximise profits.

a) On several levels and on many issues these will be mutually exclusive positions. QPWS needs to become comfortable with this difference! What we need where we cannot agree is a defined process where QPWS is involved at every step. Not wheeled in at the last minute to a *fete accompli*.
b) If DAFF want to have *carte blanche* on State forests, then they should apply to regain custodianship of them and return to sustainable harvesting regimes. The old 70/80+ harvest was sustainable on a 40-50 year cycle; current 60+ Part A harvest may be sustainable on a 70-80 year rotation; 40+ might be sustainable on a 100-120 year cycle; 30+ might be .....
c) If DAFF are custodians of State forests, QPWS could still carry out an audit role as a "third party" audit of the process, or the auditors could be included in DAFFs compliance unit.

I will comment on the issues where information is not clear below:

Issue 1: The reason the Code review stalled late last year was that FP withdrew from the process because they were not getting their way. As far as QPWS was concerned at the time (Nov 2012) the review was completed, although this would have to be reviewed now in light of new govt policies.

Issue 2: QPWS has never "required" the operation of the Code on other state lands – it was set at a higher policy level that the Code simply reflected. If in fact USL is under DNRM, then DNRM minister should be able to decide if the NFTP Code is to apply. (NOTE: DAFFs statement that the freehold code allows no residual timber bill to the landowner IMPLIES THAT THESE CODES DELIVER VERY DIFFERENT OUTCOMES!)

Issue 3:

Issue 4: The long time for review has been a direct result of FPs attempts to control the review process to obtain a better outcome for themselves. Those involved in the two SMPs mentioned have been driven to distraction by FPs tactics.

Issue 5: I agree with DAFFs comments somewhat! I am not sure that safety should be removed – it might not be a good look. QPWS should still be able to audit these areas, which is why they were called up by the NFTP Code originally, regardless of whether the NFTP Code adds new conditions.

Issue 6: QPWS acknowledges that DAFF is free to nominate diameter or girth cutting. However, as it is QPWS estate, DAFF needs to understand that QPWS has the right to not approve any such nominating where it will deliver a sub standard outcome. Previous trials of girth limit cutting have been found to be very sub-standard to normal Code outcomes.

Issue 7: Removing the ability of QPWS to approve OHPS with be a backwards step in that OHP approval is a process where desirable environmental outcomes are negotiated BEFORE any on-ground outcomes have taken place. Any corrective actions post-harvest will be more expensive to FP and deliver a reduced environmental outcome.

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Issue 8: The NFTP Code is technical because it is a very complex environment to operate in AND because all QPWS and DAFF staff are highly trained. It does not make sense to reduce protection levels just because it is a complex/difficult section of the Code. (NOTE: field staff have been able to use and apply it successfully for years....)

Issue 9:

Issue 10: This "mature approach" was attempted to be introduced by DAFF during the 2009 Operating Guidelines review. Its "enhanced partnership" was clearly rejected at that time because it was seen for what it was – an attempt for DAFF to control the audit process and gain better outcomes.

Cheers, Andrew Young

From: O'Malley Martin [mailto:Martin.O'Malley@nprsr.qld.gov.au]
Sent: Wednesday, 27 February 2013 9:58 AM
To sch4p4(6 tpg.com.au
Cc: Brittingham Geoff
Subject: FW:

Hi Andrew,

As discussed . Can you provide comments back to Geoff and me say by 1pm. His meeting is at 4 but this will allow a bit of time.

Keep it concise (dot points maybe)

Also attached media cutting re DGs letter.

Thanks

Martin

Martin O'Malley
Senior Ranger
Sunshine and Fraser Coast Region
Queensland Parks & Wildlife Service
12, 1st Avenue, Maroochydore, 4558
Ph: 5459 6168

From: Brittingham Geoff
Sent: Wednesday, 27 February 2013 9:54 AM
To: O'Malley Martin
Cc: Cubis Mick
Subject:

Martin

In response to you question.

Yes please.

Regards

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From: Brittingham Geoff
Sent: Wednesday, 27 February 2013 9:54 AM
To: O'Malley Martin
Cc: Cubis Mick
Subject:

Martin

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Regards

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Date : 14/05/2013 9:43:20 AM
From : "Young Andrew"
To : "O'Malley Martin"
Cc : "Brittingham Geoff"
Subject : RE: OHP for E-MMMO017 and E-MMMO018

Hi Martin,

No we are still looking into this one to provide feedback to DAFF. Peter Lusk has sent me some concerns regarding roading and visitation. I have requested a BAM assessment from Emma Hobbs (she has indicated it should be back by 23/5) as it was slated to come over to the conservation estate. I am concerned about harvest regimes. DAFF are now committed to 'sustainable harvest regimes' but I am concerned that 30+ and 40+ are NOT sustainable and therefore should be off the table.

I will put some formal feedback together and forward it on to you as soon as I can.

Cheers,

Andrew Young

From: O'Malley Martin
Sent: Monday, 13 May 2013 5:08 PM
To: Young Andrew
Cc: Lusk Peter
Subject: FW: OHP for E-MMMO017 and E-MMMO018

Andrew,

FYA. Have we already done this one?

Second email to follow

Regards

Martin

Martin O'Malley
A/Manager, Technical Support
Sunshine and Fraser Coast Region
Queensland Parks & Wildlife Service
National Parks, Recreation, Sport & Racing
12, 1st Avenue, Maroochydore, 4558
Ph: 5459 6168; Mob sch4p4(6) Perso

From: Brittingham Geoff
Sent: Monday, 13 May 2013 4:44 PM
To: O'Malley Martin
Subject: FW: OHP for E-MMMO017 and E-MMMO018

Martin

For your consideration please.

This is previous Western Hardwoods area.

Regards

Geoff Brittingham
Regional Director (Sunshine and Fraser Coast)
Queensland Parks and Wildlife Service
Department of National Parks, Recreation, Sport and Racing
6/12 First Avenue, Maroochydore, Qld
PO Box 318, Maroochydore QLD 4558
Ph 5459 6112 Fax 5459 6190
Mob sch4p4(6) Per
Email: geoff.brittingham@nprsr.qld.gov.au

From: Olive Stuart
Sent: Wednesday, 8 May 2013 5:32 PM
To: Brittingham Geoff

Published on DETSI Disclosure Log
RTI Act 2009

Cc: Cubis Mick; Mcgregor Steven
Subject: FW: OHP for E-MMMO017 and E-MMMO018

Geoff
Attached is an OHP and maps for a proposed sale on SF 28 Coominglah. This sale is outside the SEQFA area in the Western Hardwoods area near Monto.
Please contact me if you require any further information or clarification.
Regards
Stuart Olive
Manager (Timber Production)
Forest Products,
Department of Agriculture, Fisheries and Forestry

North Forest Management Area
Telephone: 07 48373311 **Facsimile:** 07 48373315 **Mobile:** sch4p4(6) Perso
Email stuart.olive@qld.gov.au

Level 4, 209 Bolsover Street, Rockhampton Q 4700
PO Box 1762, Rockhampton Q 4700

From: Mcgregor Steven
Sent: Tuesday, 23 April 2013 3:14 PM
To: Olive Stuart
Subject: OHP for E-MMMO017 and E-MMMO018

Stuart,

Please find attached OHP and maps for the proposed sale on SF 28 Coominglah for you to send on for approval.

Regards

Steve McGregor
Forest Ranger in Charge, Monto
Forest Products
Department of Agriculture, Fisheries and Forestry
Telephone 0741 661433 **Facsimile** 0741 661871
Mobil sch4p4(6) Pe
Email steven.mcgregor@daff.qld.gov.au

13 Rutherford Street, Monto Q 4630
PO Box 219, Monto Q 4630

Published on DETSI Disclosure Log
RTI Act 2009

Date : 12/03/2013 10:27:46 AM
From : "Jacobi Jason"
To : "Hobbs Emma"
Cc : "Kelly Todd" , "Brittingham Geoff"
Subject : RE: Part A SEQFA State forests
Attachment : State forests.pdf;

Emma,
All SEQFA part A areas are now potentially subject to ongoing harvesting - refer attached letter (2nd page top paragraph).
If a harvesting permit application has been received by Sunshine and Fraser Coast Region, it needs to go to Geoff Brittingham. He will allocate it to one of his SHREMS for action.

Thanks,

Jason

Jason Jacobi
A/Executive Director - Operations West
Queensland Parks and Wildlife Service
Department of National Parks, Recreation, Sport and Racing
Ph: (07) 33305272
Mob: sch4p4(6) Per
Email: jason.jacobi@nprsr.qld.gov.au

From: Hobbs Emma
Sent: Tuesday, 12 March 2013 8:05 AM
To: Jacobi Jason
Subject: RE: Part A SEQFA State forests

No worries, happy to follow this up myself if you don't know anything off the top of your head (particularly to talk Rob Hughes and Bill Gordon) to see what the go is, but just wanted to check internally whether there has been any thought given to these areas so far.

One particular issue is that someone in Sunshine Coast Region has received a harvesting permit application for one of these areas and has no idea what to do with it, so I need to get back to him ASAP.

Thanks,
Emma.

Emma Hobbs | Principal Project Officer
North Stradbroke Island Strategy
Department of National Parks, Recreation, Sport and Racing
Telephone: 07 3330 5976 | Mobile: sch4p4(6) Per | Facsimile: 07 3330 5996
Email: emma.hobbs@nprsr.qld.gov.au

From: Jacobi Jason
Sent: Monday, 11 March 2013 6:06 PM
To: Hobbs Emma
Subject: RE: Part A SEQFA State forests

will get back to you?
J

Jason Jacobi
A/Executive Director - Regional Operations West
Queensland Parks and Wildlife Service
Department of National Parks, Recreation, Sport and Racing
Ph: (07) 33305272
Mob: sch4p4(6) Pe
Email: jason.jacobi@nprsr.qld.gov.au

From: Hobbs Emma
Sent: Monday, 11 March 2013 3:38 PM
To: Jacobi Jason
Subject: Part A SEQFA State forests

Hi Jason,

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I'm getting a couple of questions about the status of the part A State forests - do you know whether the future management of these areas has been considered by government? i.e. for allowing harvesting and also for consideration for any forests for protected area. I am a bit out of date with this matter sorry, so if you have any info would you mind giving me a call?

Thanks,
Emma.

Emma Hobbs | Principal Project Officer
North Stradbroke Island Strategy
Department of National Parks, Recreation, Sport and Racing
Telephone: 07 3330 5976 **|** Mobile sch4p4(6) Pe **|** Facsimile: 07 3330 5996
Email: emma.hobbs@nprsr.qld.gov.au

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Queensland Government

Department of Agriculture, Fisheries and Forestry

Reference: CTS00238/13

16 JAN 2013

RECEIVED DATE 17/1/13 BY LD

Dr John Glaister
Director-General
Department of National Parks, Recreation, Sport and Racing
PO Box 15187
City East Qld 4002

Dear Dr Glaister John

The principal purpose of this letter is to inform you of recent decisions by the Honourable John McVeigh MP, Minister for Agriculture, Fisheries and Forestry regarding the management and harvesting for commercial log timber production of native forest areas within State Forests.

Minister McVeigh has approved that the areas of State Forests previously excluded from further harvesting by the former State Government, as well as the State Forest areas proposed for tenure transfer to the protected area estate, are now available for commercial log timber production and associated harvesting once again. This includes the State Forest areas within the 1.2 million hectares previously identified in the Western Hardwoods and Cypress Regions for proposed inclusion in the protected area estate and the remaining State Forest areas in central Queensland, the Mackay-Proserpine area and the north Queensland ecotone forests.

The reinstatement of these State Forest areas has provided a much needed boost of confidence to the native forest timber industry through the provision of greater certainty of supply. There is once more a belief in a long-term future for this significant regional and rural industry.

In addition, the management of the cypress forests within State Forests in southern and central Queensland for on-going commercial log timber production has allowed the department to offer the long awaited sales permits to the 14 eligible cypress sawmillers to harvest cypress sawlogs under the provisions of the *Forestry Act 1959* for period from 1 January 2013 to 31 December 2037.

Published on DETSI Disclosure Log
FOI Act 2009

Floor 8
Primary Industries Building
80 Ann Street Brisbane
GPO Box 46 Brisbane
Queensland 4001 Australia
Business Centre 13 25 23
Website www.daff.qld.gov.au
ABN 66 934 348 189

Release

The Minister has also approved that harvesting can commence in the so-called Part A areas within the region covered by the South East Queensland Forests Agreement. This harvesting is required to help meet the State's contractual supply commitments for south east Queensland and is scheduled to commence this year.

These matters were briefly discussed at the 9 November 2012 quarterly meeting of the newly formed Queensland Parks and Wildlife Service (QPWS) and the Department of Agriculture, Fisheries and Forestry (DAFF) Forestry Operational Group, where discussions were respectively led by Mr Clive Cook of QPWS and Mr Geoffrey Kent of DAFF.

At the next meeting of the QPWS and DAFF Forestry Operational Group, scheduled for 13 February 2013, DAFF proposes to discuss in more detail the efficiencies for both agencies that should be incorporated into *Code of Practice for Native Forest Timber Production for State Lands*, including the suggestion that there should be no requirement for QPWS to approve a Code compliant Operational Harvest Plan for a State Forest sale area. DAFF is also keen to see the current five yearly review of this Code completed as soon as possible as this has benefits for both industry and the agencies.

DAFF will in the near future provide QPWS with a Strategic Harvesting Plan for each region listing the proposed individual areas (or MUIDs) scheduled for harvesting over the next few years.

If your Office requires any further information, please contact Mr Geoffrey Kent, Director, Forestry of the Department of Agriculture, Fisheries and Forestry on telephone 07 3405 6920 or email geoffrey.kent@daff.qld.gov.au.

Yours sincerely

sch4p4(6) Personal information

Jack Noye
Director-General
Department of Agriculture, Fisheries and Forestry

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RTI Act 2009

Date : 15/03/2013 3:18:19 PM
From : "Healy Ross"
To : "Cubis Mick"
Cc : "Young Andrew" , "Brittingham Geoff" , "Harris Leigh" , "Griinke Mike" , "Henry Stuart" , "Naske Peter"
Subject : RE: QPWS Approval Required to harvest a number of forest products from G-TP52826

Mick,

I am unable to approve this OHP. My reasons for not approving this Part A MUID are set out below.

- I am aware that Part A MUIDs in the SEQFA are now available for timber harvesting. (DG-DG letter of 16/01/13)
- I understand that under the SEQFA these Part A MUIDs were to be harvested on a 70+ maximum with stems retained on a spacing basis beneath this. (SEQFA 2.13)
- The SEQFA did not allow for any other harvest regimes to be used.
- At present, if I were to approve operations to any other than a 70+ regime, I believe I would be in breach of the SEQFA and the Forestry Act as no alternative to the SEQFA has been agreed upon.
- I cannot approve any Part A harvest operations until I have been advised what harvest regimes are to apply to these areas in the SEQFA.

In addition to Part A MUIDs, I have had no instructions regarding harvest regimes to be applied to the former 'ARCS' MUIDs in the Western Hardwood area (30+) or reinstated forests in Central and North Queensland except for two specific operations which I reluctantly approved.

I have assumed that forests in the SEQFA 40+ areas and Western Hardwood 30+ areas, would continue to be harvested at those unsustainable levels because of contract commitments with sawmillers.

I understand from the DG-DG letter of 16/01/13 that the reinstated forests are to be harvested sustainably. This implies the use of some other harvest regime rather than 30+ or 40+.

Regards,

Ross Healy
Phone: 4936 0559
Mobile: sch4p4(6) Persc

From: Cubis Mick
Sent: Thursday, 14 March 2013 4:45 PM
To: Healy Ross
Cc: Young Andrew; Brittingham Geoff; Stumm Lance; Harris Leigh; Griinke Mike
Subject: FW: QPWS Approval Required to harvest a number of forest products from G-TP52826
Importance: High

G'day Ross

My enquiries regarding this request have lead me to you as I understand that you are covering Stuarts OHP duties Section 78B(2)(c)

That being the case can you assess the attached OHP please?

cheers

Mick Cubis
Manager Technical Support
Sunshine and Fraser Coast Region
Queensland Parks and Wildlife Service
National Parks, Recreation, Sport and Racing
07 54596113
sch4p4(6) Per

From: Stumm Lance
Sent: Tuesday, 12 March 2013 3:59 PM
To: Brittingham Geoff
Cc: Cubis Mick; Petersen Bradley
Subject: QPWS Approval Required to harvest a number of forest products from G-TP52826
Importance: High

Geoff,

DAFF Forest Products require QPWS approval in order to harvest a number of forest products from G-TP528 (Part of Deongwar State Forest).
The sawlog component has been tentatively allocated to Schifke Sawmill. Sawlog quantity has been estimated at approximately 3270m3. The remainder have been allocated as per the Operational Harvest Plan document.
Part of the muid may be able to be harvested during periods of wet weather as part of the area is easily accessed using the Esk Hampton road.

It would be appreciated if the approval process was given some urgency due to the recent wet weather and the impact it has had on current sale areas and the sawmill's contractors ability to harvest the timber.

Attached is the OHP and associated maps.

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RTI Act 2009

Regards,

Lance Stumm
Forest Ranger in Charge,
South East Forest Management Area, Kingaroy
Forest Products
Department of Agriculture, Fisheries and Forestry
Telephone: 07 4160 4205 **Facsimile:** 07 4162 4450 **Mobile:** sch4p4(6) Perso
Email: lance.stumm@daff.qld.gov.au
Shop 2 / 16 Alford Street, Kingaroy,Q 4610
PO Box 15, Kingaroy Q 4610

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