**Tasmanian Public & Environmental Health Network (TPEHN)**

<http://www.sourcewatch.org/index.php?title=Pollution_Information_Tasmania>

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Re: **Draft Forestry Tasmania Management Plan 2014** **– Initial Consultation on Draft Criteria and Objectives**

Forestry Tasmania acknowledges that its Management Plan 2014 (FTMP 2014) is being prepared to fulfil its key responsibilities contained within the Forest Management Act 2013, Section 8, which includes the responsibility to manage and control all Permanent Timber Production Zone Land (PTPZL). Forestry Tasmania also acknowledges that it needs (is required to) to secure Forestry Stewardship Certification (FSC) for its timber production and ensure that PTPZL is managed professionally and sustainably for the long term benefit of current and future generations, with the protection of important environmental and cultural values.

Therefore, one of the key areas that Forestry Tasmania needs to include in its Management Plan is the protection of water catchments with the articulation of clear strategies to ensure that no activities undertaken within the FTMP 2014 will adversely impact water quality. Adherence to the current Water Quality Act (State Policy on Water Quality Management 1997), Water Management Act 1999, National Water Initiative, Australian Drinking Water Guidelines and the Australian and New Zealand Guidelines for Fresh and Marine Water Quality contained within the National Water Quality Management Strategy (NWQMS) are a prerequisite for land use. FSC in its main objectives, states that pesticide-free measures should be taken for all pest control. Forestry Tasmania needs to articulate its pesticide policy, along with its pest control management strategies and policies in its Management Plan.

Comments regarding Criteria:

* **Criteria 1: Sustaining biodiversity**

Biodiversity needs to be protected within all areas affected by the timber industry with no adverse impact on ecosystems due to forestry practices and land management.

* **Criteria 2: Sustaining healthy forests and communities**

Forestry Tasmania needs to clearly articulate what it means by its sweeping generalised heading to this criteria.

How has Forestry Tasmania arrived at what the ‘natural conditions’ are for controlled fire and how will it use these to achieve its objectives? Does Forestry Tasmania collaborate with DHHS to abide by the national pollution standards for air quality including PM2.5 emissions?

Pesticides should not be used in timber production in PTPZL, in accordance with protecting water catchments, water quality and allowing for healthy communities.

Any chemicals used by Forestry Tasmania should not be allowed to impact adversely on water quality and so the phrase ‘minimise adverse impacts’ is a completely inadequate statement and aim.

Water, soil and geodiversity values do need protection; how this will be achieved needs to be clearly detailed. In some instances values will need to be improved- how will Forestry Tasmania identify these sites and what policies will be put in place to achieve this?

How is Forestry Tasmania interacting with communities who derive their water from and around PTPZL? They along with all downstream users need to be included in decision making regarding land management and water quality. National Toxics network (NTN) and TPEHN has already articulated these issues to FSC.

* **Criteria 3: Sustaining forest production**
* **Criteria 4: Sustaining community relations, heritage and public access** See theabove comments in Criteria 2; transparent, respectful and meaningful engagement with dialogue is essential.
* **Criteria 5: Sustaining capability and safety**
* **Criteria 6: Sustaining science-based stewardship** Science to inform continuous improvement in forest policy and management, must also include science to inform continuous improvement in policies sustaining healthy ecosystems and communities as in Criteria 1 and 2. Much scientific research has been done demonstrating the adverse impacts of the use of chemicals (including pesticides, wetting agents, fertilisers) on ecosystems including human health. Research on air pollution from smoke is also showing marked generalised adverse impacts on health. Forestry Tasmania needs to be abreast of all relevant science and implement changes to protect ecosystems and communities as well as adhering to Tasmanian and Australian regulatory systems, many of which are not up to date with modern science or technologies. Independent certification of forestry management should not mean that the certifier is in any way employed or linked to Forestry Tasmania, the Tasmanian Government or FSC and this must be an absolutely transparent process with full stakeholder engagement including all downstream water users.

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