

Name	Mathew Hensley
Business (if applicable)	Boral Timber
Email address or preferred method of contact	
Postcode	2443
Do you want your submission marked as confidential? *	No
Do you want to receive future notifications and updates on the PNF Review? *	Yes
Which of the following best describes you? *	Timber Industry
Which draft PNF Code are you providing a submission on? *	All Codes
My comments	Submission covers both Northern and Southern NSW PNF Code Reviews
Attach your submission	 19_05_20_boral_timber_submission_pnf_code_review.pdf 242.90 KB · PDF

Boral Timber Submission – Draft Private Native Forestry Codes of Practice

Introduction

Boral Timber would like to take the opportunity to provide feedback on the draft PNF Codes for Northern and Southern NSW. As a major stakeholder and supporter of the Private Native forestry in NSW, Boral timber fully endorses and supports the new draft codes. The new codes ensure that management, reporting and ongoing sustainability of Private Native forestry is maintained as a viable option in NSW for future industry. With the current concerns facing the State's resource due to the 2019/2020 bushfire season the focus on Private Native Forestry has become vital in supplementing sawlog supplies. This not only allows for continuity of a sustainable timber industry in NSW, it also provides options for landowners to manage the inherent values and risks of their own forests.

Background on Boral Timber

Boral Timber is part of Boral, the ASX100 building products and construction materials company. Boral employs around 16,600 people across its operations in Australia and 16 overseas countries and generates around \$5.8 billion in revenue. Boral Timber provides a full range of high quality timber products in both the hardwood and softwood segments, employing around 350 people across Australia. Boral Timber conducts all of its manufacturing operations in NSW where it has been part of the hardwood industry for over 100 years. In NSW alone Boral Timber employs more than 300 people across nine sites, nearly all of them in rural areas. In addition Boral Timber is a 50% owner of Highland Pine Products which at its Oberon site employs over 200 people. We estimate that in addition to these direct employees, Boral Timber and Highland Pine Products provide employment for around 1,500 people as contractors and suppliers.

In a normal operating year Boral Timber processors close to 175,000 m³ of hardwood logs, with Highland Pine Products processing in excess of 600,000m³ of softwood sawlogs.

Boral Timber has had a long history of large capital investment projects in its hardwood business with more than \$85 million invested over the past 15 years. Much of this has been focused on adding value to what Boral believes is a scarce natural resource. Boral timber strategically coordinates the supply from State owned and Private Native Forest of NSW. This supply from Private Native property supplements up to 15% of the annual sawlog production requirements of the business. It is an integral part of the supply chain, stimulating the local economy of small to medium sized contractors to conduct economically sustainable harvesting operations in the diverse range of private native forests of NSW.

With the release of the new Draft codes for PNF's in March 2020 there are a few points that Boral wish to make comment on.

Local Land Service Management:

- This has been a positive step forward in building a relationship and furthering the landowners understanding of forest management activities. With LLS already having a relationship with landowners in many instances this can identify forest management opportunities previously overlooked and assist the delivery of all the aspects of the code.

Implementation of the Code

- In the event that these codes are successfully implemented, Boral believes that the conditions of the new code should supersede the previous editions. For some PNFs that were approved several years ago there has been a number of changes to prescriptions as the increase in data, knowledge and experience has refined prescriptions to better protect vulnerable species and environmental features. It would be advantageous to conduct operations under the new code if a forest operation plan has not commenced to allow flexibility for landowners to apply the appropriate silvicultural management system to their forest type.

2. 2 Forest Stewardship:

- Boral fully endorses the concept of this for private forest landowners and has a good understanding of the philosophies behind the concept. Boral is a current member of Responsible Wood Chain of Custody community and holds principles of good forest management as a key factor in maintaining a viable and sustainable industry. The long-term management and sustainability of the environment, together with forest production is certainly an area that needs to be addressed and respected. In the past there has been incidences where a lack of knowledge and care has led to the exploitation of forest resources which is clearly visible in the present day.
- Boral is concerned whether this additional document or layer for managing native vegetation on rural lands is an added expense for the landowner. Would the Stewardship plan be applicable and maintained over the long term? The change in market conditions or ownership could possibly mean a change in objectives which could undermine previous work on forest resources. As we are well aware any management activity can have a long-term effect on a forest resource both positively and negatively. Boral proposes that the stewardship plan is enacted for a minimum period that aligns with regeneration / harvest cycles for the forest type and silvicultural management system adopted. This would ensure the positive work for improved forest health and biodiversity is followed through in its entirety promoting a sustainable forest resource.

2.3 Reporting requirements:

- This new reporting framework provides an accurate measure of active PNF's, and we encourage a more centralised data collection for future analysis. This would assist in the formulation of Stewardship plans for future PNF's and allow policy makers to make better and more informed decisions regarding Private Forestry for the future.
- One issue though is the ability for stakeholders to access information/records to ensure that due-diligence on timber resources can be carried out. This is a requirement under current Chain of Custody certification schemes. Currently there is no public third party data source which allows this to occur easily. Other stakeholders in the community would also appreciate knowing that operations within their regions are legitimate and legal, having public access to limited PNF data on approved and active PNFs would allow for this. Transparency of information is crucial in gaining public confidence that this resource is being managed in accordance with the conditions and protocols of the Code.

3.1 Small scale Harvesting:

- A great idea and allows a legal framework for small resource owners, there was obviously a demand for this to be incorporated in the code as small scale resource owners fell under the same code conditions as large scale resource owners in current codes. Assessing these PNF's under the proposed prescriptions would require additional resources to ensure monitoring and policing of compliance. Boral sees a benefit to simplifying the process for small scale harvesting which will assist in capturing the activity across all harvesting operations. Segregation of smaller non-commercial lots that still require active forest management may potentially increase LLS workload but will ensure that previous unknown harvesting activity will now be captured and apply the same environmental and silvicultural principles of the PNF Code.

3.2 Minimum Stand Basal Area for Single Tree Selection:

- The simplification of retained Basal area is a positive move, with minimum 10m³/ha on the Northern and minimum of 12m³/ha on the Southern Codes. This removes any potential confusion or discrepancy over deciphering original overall stand height.
- The sampling criteria, intensity and minimal thresholds allow it to be easily monitored ensuring compliance is maintained. The addition of the sample methodology provides a consistent approach which removes any bias or statistical error that can potentially arise from sampling error or misinterpretation of the guidelines.
- The removal of the minimum stand basal areas for broad forest types should be reconsidered. This mechanism assists and ensures silvicultural harvesting systems are adopted for site specific species, adopting the incorrect silvicultural system for certain forest types can impair the performance of the site when regenerating. Boral would welcome the introduction of broad forest type with aligned basal limits to suit.

3.4 Forest regeneration:

- Critical for the long-term management of forests, although monitoring the success of this in the past has been an unknown. Boral encourages an active / routine monitoring arrangement as part of the Forest Stewardship Plan that requires ongoing involvement from the Landowner to monitor the regeneration performance post-harvest. This could be achieved via a triennial measuring requirement in Forest Stewardship Plan and in conjunction with the reporting requirements of PNF. This could assist identifying remedial action if regeneration is not performing as expected from the monitoring exercises.

4 & 5 Pest Management & Fire Management

- Including these both into the Stewardship plans allows landowners the opportunity to incorporate pest and fire management strategies into the planning phase and potentially allocate the required resources as part of their regular forest and land management activities. This is positive inclusion for the codes.

6.2 Protection of habitat and biodiversity

- In regard to the retention of habitat trees, Boral acknowledges that the Code now recognises the adoption of 2 dead trees that can contribute to the minimum 10 hollow bearing trees in every 2 hectares. This inclusion will be beneficial in years to come to cater for areas of resource that have been impacted by fire and resulted in a larger number of mature trees that may be dead but that have positive biodiversity values.
- Boral has concerns that the code may encourage that only the minimum number of habitat trees are retained as outlined in 6(b). There appears to be no recognition within the code for landowners and forest ecosystems that wish to retain above the current prescriptions of environmental protections. Landowners may wish to do this in order to promote additional biodiversity values and the acknowledgement of ecological functionality of the forest as a whole, rather than down to individual attributes within the landscape. This should be encouraged within the code and documented within the Stewardship Plan.

In summary, the simplification of some of the technical aspects of the Code, especially around BA retention and silvicultural practises is a positive move. The future management of PNF will become more critical in time, as the value of forestry fibre continues to provide products that are natural, recyclable and renewable assisting with carbon sequestration and storage.

Boral would like to encourage the ongoing community awareness and education on the positive attributes that the forest industry provides. There needs to be emphasis on sustainable forest management activities as part of future proofing our communities through forest fuel reduction management, improving and maintaining native flora and fauna and stimulation of regional economies for the future.

Mathew Hensley
Resource Manager
Boral Timber