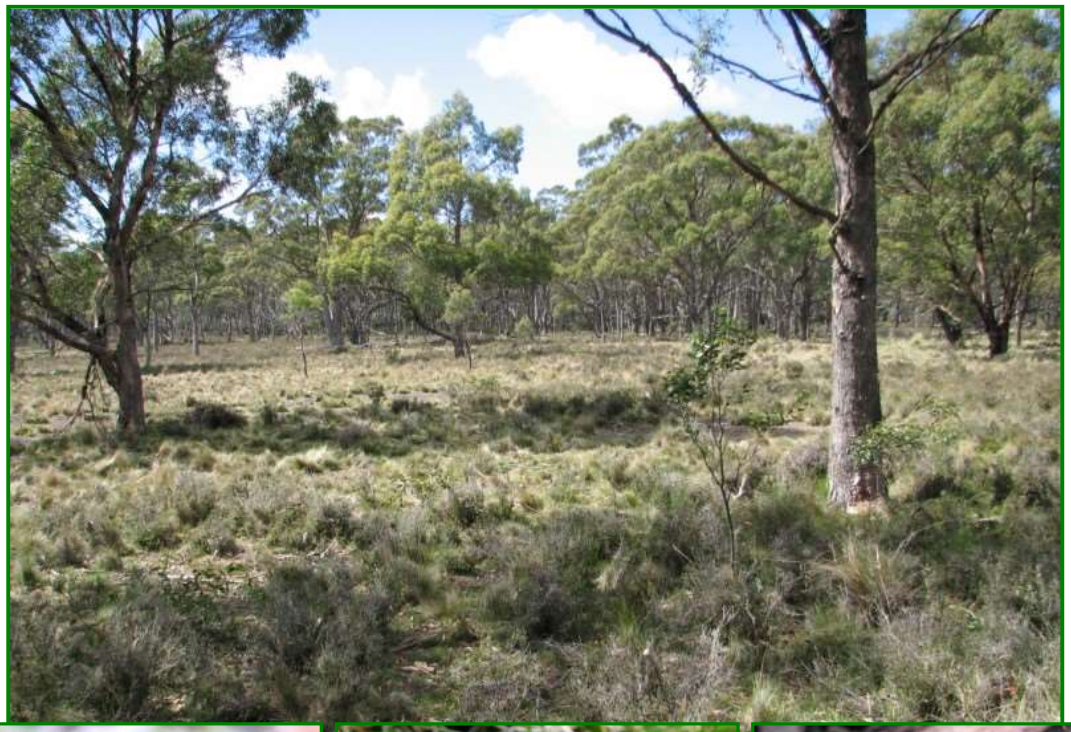
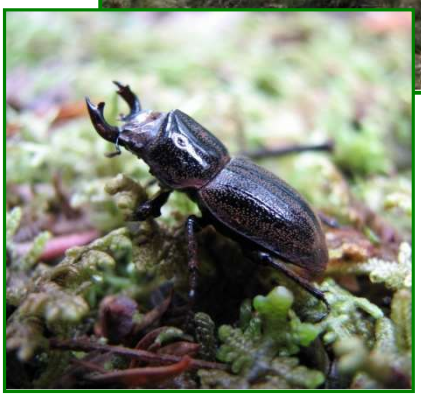
SFM Natural, Cultural and High Conservation Values Management Plan





June 2022

SFM asset management

SFM acknowledges the traditional custodians of the land that we manage. We show respect to their culture and their elders who have managed the land in the past.

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Revision

This document will be updated whenever significant changes occur.

Version	Changes	Date
V1	Original	01/09/2010
V2	Revised	01/09/2011
V3	Major Review	01/11/2012
V4	Minor Update	1/10/2013
V5	Minor Update	23/09/2018
V6	Major Update	29/08/2019
V7	Minor Update	28/04/2020
V8	Minor Update	24/08/2021
V9	Minor Update	30/6/2022

Cover illustrations

Main image: Mosaic of *Eucalyptus rodwayi* forest and woodland and Highland *Poa* grassland near Interlaken; Insets (left to right): Mt Mangana Stag Beetle (*Lissotes menalcas*) from near Geeveston, Ptunarra Brown Butterfly (*Oreixenica ptunarra*) from near Interlaken, Fairy Lanterns (*Thismia rodwayi*) from near Sandspit River (all images: © Mark Wapstra).

Contents

SFM Natural, Cultural and High Conservation Values Management Plan

1.0 Objective

To describe the methods used for effectively identifying, managing and monitoring natural and cultural values and high conservation values (HCV) within SFM's managed forests.

2.0 Process of development and revision

This document was originally produced in September 2010 when it was given the title '*Management and Monitoring of Natural and Cultural Values and High Conservation Values within the SFM Estate'*. The document was re-named '*SFM Natural, Cultural and High Conservation Values Management Plan'* in 2011.

This document was reviewed as part of a Preliminary Audit conducted by Soil Association – Woodmark to identify gaps in SFM's preparation for its first main audit for Forest Stewardship (FSC) certification®. To address issues raised in this Preliminary Audit, SFM engaged Environmental Consulting Options Tasmania (ECO*tas*, Mark Wapstra) to provide an analysis of the actual and potential presence of HCV forests within SFM's managed forests, which at that time were all in Tasmania. This analysis was then reviewed by Fred Duncan, consultant ecologist, who provided comments and direction.

Stakeholder feedback was sought from organisations involved with the range of High Conservation Values potentially present within the estate, and their input incorporated into the document. Following the Main Audit in May 2011, further changes to the document were made. A table of stakeholder issues raised and SFM's response is given in Appendix 1. The document was re-released to Stakeholders in September 2011. No comments were received.

A minor review was undertaken in October 2013 to include consideration of the High Conservation Values (HCVs) Evaluation Framework (released 2013), a guideline for implementing FSC Certification to the FSC Principles and Criteria and Controlled Wood standards developed by FSC Australia.

As part of the process of expanding SFM's certified scope to the mainland of Australia, this document has been revised and lifted to a higher-level Australia-wide planning document for the company. In addition to this high-level planning document, an FMU specific HCV assessment document has been developed which meets the requirements of the High Conservation Values (HCVs) Evaluation Framework and the FSC Australia National Forest Stewardship Standard (specifically Principle 9 and Annex G). It is the FMU specific documents which SFM will invite Stakeholder review and feedback.

Further minor reviews may be undertaken in response to significant changes in legislation, standards or SFM policies, with revised versions posted on SFM's website.

3.0 Scope of this document and planned review

There are three levels of management planning documents that together outline SFM's approach to forest management. This document and the SFM Forest Management Plan represent the top level of management planning, giving over-arching objectives for how forest areas will be managed by SFM, and describing the

systems in place to achieve them. This level is underpinned by FMU specific HCV assessments and Tasmanian and mainland Australia planning documents. These documents describe the relevant legislative and regulatory requirements, and the management approach for identified natural, cultural, and HCV issues in each State. Underneath this, Estate Management Strategies (EMS's) outline the management strategy for each region/forest management unit/defined forest area, followed by site specific property management plans which cover each property and the management of the values found within them. Operational plans are developed for areas in which roading, harvesting or reforestation works are occurring.

The *SFM Natural, Cultural and High Conservation Values Management Plan* covers the approach that is to be used in regard to natural and cultural values for all properties under SFM's management control, regardless of land tenure or certified status. Additionally, the areas within the FSC Group Certification Scheme are evaluated for the presence of HCV forest as described below.

3.1 Resource base and certified areas

SFM holds forest management certification to Sustainable Forest Management Australian Standard AS4708 - Responsible Wood (RW), and the FSC Australia National Forest Stewardship Standard (FSC NFSS).

For the purposes of RW, SFM initially defined the scope of its RW certification (its Defined Forest Area, or DFA) to include all of its native forest management on private properties in Tasmania. This has been re-defined to include plantation areas in Tasmania and on the mainland. The makeup of the DFA changes periodically as properties pass into and out of SFM's management control.

For FSC certification, forest areas owned by other parties but managed by SFM are considered individual Forest Management Units (FMUs). The collection of FMUs define the scope of the FSC-certified area, which is covered by a Group Certification Scheme. SFM's FSC-certified area currently contains FMUs in Tasmania, South Australia, Victoria, and Western Australia.

A full description of SFM's resource base is given in the *SFM Forest Management Plan*, available as a download on our website (www.sfmes.com.au). The locations of properties that make up the Resource Base are shown on maps available on the company website. New properties will be identified periodically on the website as they come under SFM's management control.

3.2 Legislative and regulatory environment

The main Commonwealth legislation relevant to natural values is the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA). This Act lists threatened species, ecological communities and threatening processes at the national level.

Several statutes relate to the preservation of cultural values at the national level, including the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*. Importantly, additional legislation in each State identifies natural and cultural values worthy of protection in that jurisdiction.

4.0 Identifying natural and cultural values and High Conservation Values

The identification of natural and cultural values is undertaken during the initial planning and mapping process prior to the preparation of operational plans. Issues of potential environmental significance that may be present within, or adjacent to, the

proposed operational area are evaluated, and management prescriptions developed.

These include flora, fauna, cultural heritage (both indigenous and non-Aboriginal) geomorphology, soil and water, and visual landscape. These areas are addressed by the Responsible Wood Criteria 4.3, 4.5, 4.6 and 4.8 and the Forest Stewardship Council Principles 6 and 8. The assessment process also covers High Conservation Values, as addressed in FSC Principle 9.

In 2013, FSC Australia developed a *High Conservation Values (HCVs) Evaluation Framework* for use in the context of implementing FSC Certification to the FSC Principles and Criteria and Controlled Wood Standards. The document was updated in 2019, shortly after release of the NFSS and references a Directory of Information Sources, a database of existing data sources which may identify HCV's. The use of the framework is not normative (compulsory) for Forest Management certification, however, is considered here for completeness. SFM have also referred to another document to add clarity, the HCV Resource Network publication *Common Guidance for the Identification of High Conservation Values (2013)*.

Some natural and cultural values may be initially identified from publicly available sources (e.g. databases). *The Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth) lists the flora and fauna species and communities that are considered threatened Australia-wide. Additional legislation in each State further identifies threatened taxa at the State level.

Field assessments are an essential part of the planning process, and often result in the identification of additional values. All staff and/or consultants conducting these field assessments have been specifically trained in identifying natural and cultural values. The results of these assessments are documented by SFM, and the management prescriptions required to manage them are derived using the accepted process for the relevant State, input from stakeholder engagement (including professional advice). Any new sites identified are provided to the State government agency responsible for managing Statewide datasets, as required under legislation.

4.1 Flora

Consideration of flora values during the planning process aims to identify any flora values present at both the vegetation community and individual species levels. A major focus of the fieldwork involves the classification and mapping of vegetation community boundaries. During this work suitable habitat for priority species may be identified, and formal flora surveys may be undertaken based on known locations of priority species in the local area or in similar ecosystems.

Flora values can also be important as habitat components for certain fauna species, e.g. *Poa* grassland may provide habitat for the threatened Ptunarra Brown Butterfly, *Eucalyptus baxteri* or *E. arenacea* provide critical feeding habitat for the threatened (Critically Endangered) South Eastern Red-tailed Black Cockatoo, and forests dominated by *Eucalyptus ovata* or *E. globulus* may provide habitat for the threatened Swift Parrot.

The pathogen *Phytophthora cinnamomi* (PC) can affect a range of native flora species as described in the 2018 'Threat Abatement Plan for Disease in Natural Ecosystems caused by *Phytophthora cinnamomi*'. Specific vegetation communities are acknowledged as being particularly susceptible to PC due to the presence of many of these individual species. PC may also impact on a single species in a

community that is otherwise not affected. SFM field staff have been trained to recognise indicator species and the symptoms that indicate the presence of PC.

Other flora values include the identification of remnant patches of native forest, locations of weed species that may already be present on the site, and the presence of forest health issues such as insect attack. Declared weeds have the potential to not only invade properties managed by SFM, but also adjoining properties.

The identification of flora values is also discussed below in the section on High Conservation Forests – category HCV3.

4.2 Fauna

Known locations of nests, dens and colony sites used by threatened fauna may be identified from publicly available databases. Much of the focus of fauna value planning, however, is on the identification of potentially suitable habitat for species likely to be present in a particular area. Formally accepted habitat descriptions are used in conjunction with field assessments to identify suitable habitat for these species. In some cases, as for the wedge-tailed eagle, the identification of suitable habitat leads to a search for nests and/or the discovery of a new nest.

Threatening processes that relate to fauna are also considered in the planning process. For example, the chytrid fungus is a pathogen that is prevalent in cooler areas throughout southern Australia and has been linked to a decline in some frog species. Forestry, among other activities, may affect the rate at which this disease spreads. Accepted management approaches aim to conserve ecologically resistant amphibian populations, with an emphasis on threatened and endemic amphibians. Therefore, identification of suitable habitat for such species is important in the planning stage.

4.3 Soil, Water and Geomorphological Values

Geological features, landforms, and certain types of soil associations are considered important for forestry planning. These are intrinsically valuable and worthy of protection from environmental harm. They are also important in the landscape, as they may be linked to surrounding areas and geological assemblages, e.g. through limestone features. SFM staff have been trained to identify unusual geomorphological features in the landscape and to consult with experts as required.

The identification of soil and water values is undertaken to determine potential impacts of a forestry operation on water quality, soil stability and geomorphic features. As part of the assessment process, the location and catchment areas of all watercourses within and adjacent to the proposed operational area are mapped. Streams are assessed for any erosion features which may require widening of unharvested riparian reserves. Parent rock materials, soil types, erodibility characteristics and slopes are all assessed and contribute to the location of harvest boundaries, and the types of machinery permitted in the coupe.

Acid Sulfate Soils (ASS) underlie parts of some coastlines and some inland locations. They are natural soils that contain sulfides (mostly iron sulfides), usually in microscopic form. Most of these sulfides were formed by bacterial activity (sulphate-reducing bacteria) in underwater sediments over thousands of years. Sea water provides a ready source of sulfate sulfur for conversion to sulfides and thus extensive areas of ASS tend to be found on low-lying coastal margins once covered by sea water. Acid sulfate soils may also underlie inland areas such as peat bogs, salt lakes and wetlands.

If acid sulfate conditions underlie such natural features, disturbance will result in a release of sulfuric acid and reduced oxygen levels in the water.

4.4 Cultural Heritage

Aboriginal people have called Australia home for tens of thousands of years. Aboriginal people still maintain cultural practices, access their cultural resources and continue cultural activities that provide a strong connection to their current and traditional lifestyle. The tangible aspects of Aboriginal heritage consist of objects, places, natural resources, and artefacts. The intangible aspects of Aboriginal heritage consists of important spiritual places. This heritage is important to Aboriginal people and must be managed, protected, understood and respected. The best practice for ensuring Aboriginal heritage is managed and protected in an appropriate manner is to involve the Aboriginal community. SFM operations have the potential impact on Aboriginal cultural heritage. Examples of the type of Aboriginal heritage that could be impacted include rock art, stone artefacts, stone arrangements, middens, burial sites, scar trees, massacre sites and other places of spiritual and cultural significance.

Other cultural heritage includes post-colonial non-Aboriginal heritage. Historical heritage, such as old buildings, ruins, logging or mining infrastructure, or stockyards, are an important part of Australia's post-settlement history and must be preserved and respected.

The likelihood of Aboriginal and other historical cultural heritage being present in the proposed operational area is assessed using the approved methods for the relevant State. If required, checks are conducted to establish if any cultural heritage sites are known to exist on the land being considered for operations. This may be followed by field surveys, and the development of heritage protection prescriptions if artefacts are identified.

4.5 Visual Landscape

Visual management for forestry operations aims to ensure that operations stay within the character of local land use, while minimising their visual impact. The three major elements of public sensitivity, distance zones, and scenic quality are used to classify the importance of visual management for a proposed harvest area. Viewing points from sites such as roads, recreational boating areas, and lookout points are determined from reconnaissance and local knowledge. Depending on the complexity of the site and the attitudes of the viewing public, photographs, maps and drawn profiles may be adequate to determine the likely visual impact. In more prominent or sensitive locations, computerised modelling of "viewsheds" from which the site can be seen may be necessary.

4.6 High Conservation Values

High Conservation Values (HCVs) are classified as values within the forest of outstanding and critical importance. They are intended to capture conservation issues of high priority or significance on a national, regional or global scale, and to ensure that values of national or international conservation significance are properly identified and addressed. HCVs may be identified during the planning process in much the same way as other natural and cultural values described above.

The concept of "biodiversity hotspots" is relevant to that of HCV forests. Conservation International, a non-profit environmental organisation based in Washington DC, has identified 36 biodiversity hotspots around the world, including one in the southwest of Western Australia. Within Australia, 15 national biodiversity hotspots were identified by the Australian Government's Threatened Species Scientific Committee in 2003. Biodiversity hotspots are areas that support largely intact ecosystems with a good representation of naturally occurring species and communities. Additionally, they support a high diversity of locally endemic species with restricted known ranges. Hotspots were identified where the natural ecosystems were largely intact, the occurrence of endemic species was abundant, and the levels of current or future threat to biodiversity were considered to be high. The identified hotspots will be taken into consideration in SFM's management planning.

When initially preparing this document, SFM engaged Environmental Consulting Options Tasmania (ECO*tas*, Mark Wapstra) to provide an analysis of the actual and potential presence of HCV forests within the SFM forest estate. This analysis was then reviewed by Fred Duncan, consultant ecologist, who provided comments and direction. Stakeholder input was then sought, discussions held, and alterations made to this document (Appendix 1). This document was then updated as part of the process of expanding SFM's certified scope to the mainland of Australia and was lifted to a higher-level Australia-wide planning document for the company. In addition to this high-level planning document, an FMU specific HCV assessment document has been developed which meets the requirements of the High Conservation Values (HCVs) Evaluation Framework and the FSC Australia National Forest Stewardship Standard (specifically Principle 9 and Annex G). It is the FMU specific documents which SFM will invite Stakeholder review and feedback.

This management plan is based on the principle that the company's routine planning for biodiversity management will include consideration of HCVs. The sections below outline the approach SFM has proposed for identifying each of the 6 HCVs. Individual Property Management Plans (PMPs) for FSC Group Scheme properties will include a description of any HCVs identified on that property and the management approach to be employed. Stakeholder consultation regarding HCVs will be conducted as new properties (FMUs) become Provisional Members in the FSC Group Scheme.

The "precautionary approach" to HCVs is a requirement for FSC certification. The precautionary approach means that when there is some doubt as to the presence a HCV, the precautionary assumption is that the value is present. Incomplete information shall not be used as a justification for actions that may negatively affect an attribute of HCV (Proforest 2008).

The six categories of HCV forests are defined in the ProForest publication *Assessment, Management and Monitoring of High Conservation Value Forest: A Practical Guide* (ProForest 2008) and were initially used to frame the HCV analysis below. Although these definitions have been accepted and adopted by FSC Australia, they have

been updated to reflect the definitions outlined in Annex G of the *FSC Australia National Forest Stewardship Standard (NFSS)*.

HCV1 – Specifies diversity. Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.

The NFSS considers HCV 1 to include one or more of the following values: areas that contain significant concentrations of rare and threatened species or that contain habitat critical to the survival and long-term viability of these species, areas that contain centres of endemism, areas that contain significant concentrations of rare species that are poorly reserved at the IBRA region scale, areas with mapped significant seasonal concentrations of species, areas of high species/communities diversity, and areas of refugia.

SFM has interpreted HCV1 forests as forest areas that are known or likely to support, based on available habitat information, significant concentrations of flora and fauna species classified as threatened. Note that the term 'threatened' is used in its generic sense and includes all species afforded a legislated conservation status in Commonwealth and State legislation, and the IUCN Red List (categories above near threatened).

All new properties being considered for management by SFM will be subject to a review of possible occurrence of HCV1 values. All of SFM's FMUs are digitised onto a computer-based mapping system (Geographic Information System, or GIS). Records of threatened flora and fauna, as defined above, are obtained from relevant databases, and overlain on the proposed FMU and/or within approximately 1 km.

The known or likely presence of threatened flora and fauna within each FMU is assessed by examining the database records falling within or adjacent to the FMU. Where available, spatial data from relevant databases relating to landscape-level biodiversity measures such as endemism, refugia and old growth are overlain on the new FMU. The potential of an FMU to support threatened fauna can be assessed by overlaying available potential range boundary maps for specific species where available. Where values are identified from these desktop analyses, they will be specifically investigated in the field for confirmation, and to identify appropriate management options if the values have been found to be present.

HCV1 - Fauna

The identification of HCV1 involves both the identification of known locations (point records) of threatened species and the identification of potential suitable habitat for threatened species. Several species of threatened fauna have wide distributions and occur in a wide range of vegetation types, although usually some specific locations and/or habitat features are regarded as *potential* habitat and likely to support that species in the short and/or long term.

A number of other species of threatened fauna have wide distributions and occur in a range of vegetation types, but it is practical to define specific habitat features *critical to the persistence of the species*. This *significant* habitat includes both areas known to be of high priority for the maintenance of breeding populations throughout the species range, and areas that do not currently support breeding populations of the species but that need to be maintained in order to ensure the long-term future of the species e.g. the South Eastern Red-tailed Black Cockatoo (regionally distributed but nest sites and foraging habitat are significant). With respect to these types of

species, where areas within the SFM forest estate support significant habitat, HCV1 values can be considered to be present. It would be unusual and unlikely for plantation areas to support significant concentrations of threatened fauna.

HCV1 - Flora

Native forest may have the potential to support threatened flora to varying degrees. Previous records of species from within 1km of the FMU, site characteristics, surveys and/or specialist opinion are used to determine their presence or absence. Adequate protection of potential habitat can frequently be afforded in the proposed prescriptions. For example, several species of threatened flora are strongly associated with riparian habitats, which are routinely excluded from operational areas. It would be unusual and unlikely for plantation areas to support significant concentrations of threatened flora.

HCV2 – Landscape-level ecosystems and mosaics. Intact Forest Landscapes and large landscape-level ecosystems an ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

Forest areas have the potential to be considered HCV2 forests if they form a significant part of a large and relatively intact block of forest, where these are rare in the wider landscape. The NFSS considers HCV 2 to include one or more of the following values: landscape-level native forests with successional stages, forest structures, and species composition that are similar in distribution and abundance to native forests that have experienced minimal human disturbance, excluding traditional Indigenous management regimes; forests recognised as being regionally significant at the bioregion or larger scale in formally recognised reports or peer-reviewed journals, due to the unusual landscape-scale biodiversity values provided by a size and condition of the forest relative to regional forest land cover and land use trends; forests that provide regionally significant habitat connectivity between larger forest areas and/or refugia; and Intact Forest Landscapes, wilderness areas, forests that are roadless, and/or have not been affected by forest management activity.

There are no publicly available databases that define or delineate, in either a general or a specific sense, forest sites in Australia that may meet the criteria of HCV2 forests. The use of GIS layers that predict the extent of endemism, refugia and old growth forest, as described under HCV1 above and HCV3 below, is also relevant to the evaluation for HCV2. When available, these layers are used to give a landscape context to the proposed operational area.

Potential FMUs for the FSC Group Scheme are examined with respect to their spatial relationship to extensive areas of native vegetation that may be considered to contain national, regional, or globally significant large landscape-level forests.

Privately-owned native forest often contains areas that have been subject to human-induced disturbance. Histories of logging, ringbarking, grazing and gravel-mining have all shaped the character of the landscape. In most places, these activities have left a legacy of roads, tracks, and log landings within the forest. Where the FMU's adjoin public forest, there is almost always a history of forest harvesting associated with these surrounding areas as well.

The selective harvesting techniques employed within our native forests are not stand-replacing events, and as such do not fragment continuous forest cover. Where

multiple age structures are present, these are maintained within the stand post-harvest. Streamside buffers and other areas retained for fauna habitat within the harvest unit specifically target older, hollow-bearing components of the stand. Plantation areas do not fit the criteria of HCV2.

HCV3 – Ecosystems and habitats. Rare, threatened, or endangered ecosystems, habitats or refugia.

The NFSS considers HCV3 to include ecosystems (including rainforests) that are threatened, depleted or poorly reserved at the IBRA bioregion scale, or are subject to threatening processes predicted to substantially reduce their extent and function; areas for conservation of important genes or genetically distinct populations; old-growth forest; and remnant vegetation in heavily cleared landscapes and mature forest in degraded landscapes.

Defining HCV forest for SFM's FMUs in relation to the broad definition of HCV3 (above) requires a consideration of the terms "rare", "threatened", "endangered" and "ecosystems". For the purposes of defining HCV3 forest within the SFM forest estate, Commonwealth and State listed threatened vegetation types have been recognised. The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides for the listing of nationally threatened ecological communities. In Tasmania, Schedule 3A of the Tasmanian *Nature Conservation Act 2002* identifies vegetation communities that are considered "threatened" at the State level. Victorian 'threatened' ecological communities are identified listed in the Flora and Fauna Guarantee Act (1988) and captured at the Bioregion level by the *Criteria for Bioregional Conservation Status of EVC's*. No state level legislation outlines threatened ecological communities in South Australia and in Western Australia, threatened ecological communities are listed under the Biodiversity Conservation Act 2016 at the state level.

In land use decisions affecting forest vegetation that is difficult to classify, a precautionary approach is adopted, with the forest type being allocated to the community that has the higher conservation priority.

A clear picture of the classification and extent of vegetation communities within SFM's FMUs is fundamental for the purposes of evaluation for HCV3 values. This data is collected in the field and mapped as part of the natural and cultural values evaluation process, prior to being approved by specialists. Database layers of vegetation communities are referred to as an initial guide but can often differ from ground-truthed vegetation mapping, especially at a local scale.

In native forest, higher quality wood production forests are generally not classified as threatened because they are widespread, common and well-reserved. At a property-level scale, sites supporting threatened vegetation types are often excluded from operational areas due to unsuitable forest types (often of low commercial quality on infertile substrates) or unsuitable site characteristics (e.g. poorly drained or rocky areas).

HCV4 – Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.

The NFSS states that HCV 4 is focused on basic ecosystem services in critical situations. Due to the dispersed nature of SFM's managed properties across the landscape, it is

relatively unlikely that they could be classified as being critical to basic services of nature.

Timber Harvesting Plans and Operational Plans must take the goals of regional catchment management authorities into account. This is particularly important when plantations are harvested and re-planted, affecting the demand for water within a catchment.

All watercourses within the FMUs are protected by streamside reserves, whose widths vary depending on catchment area to provide watershed protection and erosion control. No harvesting may occur within these streamside reserves. Frequently, these reserves are made wider than required by legislation or regulatory requirements, representing a precautionary approach to soil and water management.

HCV5 – Community needs. Sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or Indigenous Peoples.

To date, none of SFM's FMUs have been identified by their owners, neighbours, or local stakeholders as performing such functions. See also discussion under HCV4.

HCV6 – Cultural values. Sites, resources, habitats and landscapes of global or national cultural, archaeological and historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples, identified through engagement with these local communities or Indigenous Peoples.

The NFSS considers HCV6 to include aesthetic values; historic values of global or national cultural or archaeological significance; long term research sites; social (including economic) values; spiritual and cultural values.

As part of the natural and cultural values evaluation, a desktop assessment is conducted to establish the likelihood of Aboriginal and non-Indigenous cultural heritage being present on the land being considered for operations (see section 4.4). On the basis of this, a field survey may be warranted, and will be conducted by a suitably qualified person as permitted in the relevant State.

SFM includes representatives from Indigenous community groups in its list of stakeholders and has sought and received feedback regarding its methods for the identification and protection of Aboriginal heritage. Additionally, this engagement ensures that any areas currently being used for traditional activities by the community could be discussed with SFM before operations began. To date no such areas have been identified.

5.0 Managing natural and cultural values

Management options for forest areas containing significant natural or cultural values or HCVs may take several forms. For example, areas may be excluded from the managed area, reserved within it, or harvested subject to restrictions specifically designed to protect the value. These management prescriptions may at times exceed legal requirements, where specific site conditions require a more precautionary approach. Identified natural and cultural values and their management zones (if any) are indicated on the PMP map and any operational planning maps (e.g. Forest Practices Plan (FPP), Timber Harvest Plan (THP), operational map). SFM have also

considered the movement of key plant and animal species between reserved and harvested/operational areas.

SFM acknowledge that different species have varying levels of mobility (e.g. kangaroos are highly mobile while koalas are quite the opposite). To manage this, SFM maintain existing native vegetation and corridors for species like the koala, SFM carefully consider the harvesting direction to ensure that the koalas move towards habitat areas. The nature of the plantations under SFM management also allow for movement of species via remnant native patches scattered through the plantation which are protected from operations.

For the purposes of this document, areas referred to as "reserves" includes any areas retained from harvesting in FPPs/THPs such as streamside reserves, steep slopes, wildlife habitat clumps, areas of highly erodible or vulnerable karst soils, and other areas set aside for various management reasons. Sometimes, areas supporting known sites or habitat of threatened species or vegetation types may be included in reserves. The prescriptions set out in the operational planning document provide an enforceable, auditable mechanism for achieving protection of the value(s).

The NFSS, under which SFM holds its FSC certification, stipulates that certificate holders shall identify conservation measures for the protection and/or restoration of representative sample areas. These areas in combination with other components of the conservation area network comprise a minimum of 10% of the Forest Management Unit. SFM exceeds this requirement, having approximately 19% of its FSC-managed forest area in reserves.

5.1 Flora (includes threatened flora, vegetation types and other flora-related values)

All flora species listed as vulnerable, endangered and critically endangered under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* are, by virtue of their listing, protected by that Act. All flora species listed as threatened under State laws are, by virtue of their listing, protected by those laws.

Prescriptions to avoid the spread of *Phytophthora cinnamomi* (PC) are included in operational plans where appropriate. To prevent the spread of PC or weeds, the washdown guidelines for machinery are prescribed and records of machinery washdown between properties are kept.

Areas of native non-forest vegetation where many of the principal characteristics of native ecosystems such as complexity, structure and diversity are present occur in small areas under SFM's management control. For operational reasons, landowner preference, OHS or landscape reasons these are generally excluded from the operational areas. If they lie within operational boundaries, they are managed using prescriptions designed to preserve their unique values.

Wetlands are defined in Article 1.1 of the Ramsar Convention (1971) as "areas of marsh, fen, peat land or water, whether permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres". There are several wetlands within SFM's FSC-certified area, some of which are of High Conservation Value. All wetlands are routinely excluded from SFM's operational areas and prescriptions are detailed in operational plans to ensure their protection.

5.2 Fauna

All fauna species listed as vulnerable, endangered and critically endangered under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* are, by virtue of their listing, protected by that Act. All fauna species listed as threatened under State laws are, by virtue of their listing, protected by those laws.

Procedures for managing habitat for fauna values include using publicly available databases to identify values, undertaking site assessments to identify sites and potential habitat and using decision-support tools where available.

On any property where SFM has management control, existing habitat is protected (Wildlife Habitat Strips (WHSs) and Wildlife Habitat Clumps (WHCs)) from operations to ensure connectivity and integrity is maintained. Where WHSs are present, forested areas on adjacent properties are linked to these areas, providing a continuity of habitat across tenure. In addition to WHSs declared in operational plans, SFM routinely defers from harvesting large areas of forest, creating *de facto* informal reserves. WHCs are smaller, protected patches established within harvest areas. Both WHCs and WHSs must be located where they will capture trees with hollows, downed logs, ground cover, and other features that provide habitat for wildlife.

Measures to control the spread of the chytrid fungus in the amphibian population are given in the Commonwealth Government's *Threat Abatement Plan* (Department of Environment 2006). Allan & Gartenstein's (2010) manual *Keeping it Clean* provides general guidelines on managing the pathogen. However, to prevent the spread of PC or weeds, machinery washdown guidelines are enforced in the SFM's managed forests and records of machinery washdown between properties are kept. Application of these prescriptions, within the scale and intensity of SFMs forestry activities, address the risk of spreading the chytrid fungus within and between SFM's FMUs.

5.3 Earth Sciences

Management of geomorphological and soil and water values begins during the planning process, considering slope, soil type and erodibility, and the presence of permanent and/or intermittent watercourses. If issues are identified, a specialist may visit the site to determine the best way to proceed.

All watercourses in are buffered with no-harvest zones / no-operation zones of various widths based on their catchments and classification.

For management of soil and water issues such as erosion control, watercourse protection and the preservation of riparian zones, the regulatory guidelines for each State are the minimum standard for SFM's operations. Any new road construction is undertaken according to relevant roading manuals, if available.

Acid Sulfate Soils (ASS) are natural soils that contain sulfides (mostly iron sulfides), usually in microscopic form. In an undisturbed and waterlogged state these soils are harmless, but when disturbed and/or exposed to oxygen through drainage, excavation or climate change, a process of oxidation can produce sulfuric acid in large quantities. SFM recognises that management precautions for ASS are important and has incorporated a check for their presence into its planning process.

5.4 Cultural Heritage

SFM is committed to ensuring that Aboriginal and historic cultural heritage present on SFM-managed land is identified and preserved.

SFM have staff who are trained to search for and identify high sensitivity zone indicators for Aboriginal cultural heritage. If a site is found or suspected, the appropriate channels will be followed to recommend a formal search for artefacts. Several SFM staff have completed a Cultural Heritage Course, and gained competency in archaeological site surveying, recording, and management and legislation. This more detailed search may take place before or after the operation, depending on the likelihood of the operation providing enhanced visibility of the ground surface.

If a new cultural heritage site is identified during the planning process, SFM drafts specific management prescriptions to protect the site in consultation with stakeholders. The location of the site is forwarded to the appropriate department for inclusion on site databases. If the operation is underway, a variation will be made to the operational plan to include the approved management prescriptions for the newly identified site.

Two Commonwealth legal statutes that have been enacted to ensure the preservation and protection of cultural heritage. Those relevant to SFM are:

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*; and
- *Environment Protection and Biodiversity Conservation Act 1999*

Each of these acts set out a number of provisions relating to Aboriginal and historical cultural heritage and creates specific offences at law for damaging or interfering with Aboriginal or historic cultural heritage. Both individuals and corporations are required to abide by this legislation, which is applicable to all states of Australia. Individual State statutes also apply to the protection of Aboriginal cultural heritage and are identified in the planning manuals for that State.

Several sites containing Aboriginal artefacts have been identified on land managed by SFM and are protected by buffer zones from forest operations. Detailed management prescriptions for each site are detailed in site specific PMPs.

5.5 Visual Landscape

Modifications to reduce visual impact are incorporated into operational planning on an as-needed basis. Measures such as rounding off the corners of the coupe boundary or lessening the intensity of cutting along skyline ridges may be prescribed when public sensitivity is high, and operations are highly visible. In some cases, monitoring of the skyline throughout the operation may be prescribed. This consists of a system of periodic checks, including the taking of photographs, from a specific location over the period of harvest. Operations are halted if any adverse impact on the skyline is detected, and an on-site meeting held at the viewpoint to discuss how to proceed.

5.6 High Conservation Values

The precautionary approach, in terms of management, explicitly recognises all possible information is not available, but nevertheless attempts to address the obvious and major impacts/threats while more information is collected (Proforest 2008)

Management strategies for the HCV's identified within SFM's FMU's include measures such as exclusion or reservation of areas from harvesting, buffering of important known sites from harvesting and other forest operations, and seasonal restrictions designed to ensure breeding success of threatened species. Consultation with relevant stakeholders and specialists, and communication of any new values identified for inclusion in State-wide databases also form important parts of the management process.

The decision to harvest or reserve any area of forest, including threatened communities, is made carefully. In Tasmania, one of the primary considerations is the likelihood of establishing successful regeneration from native production forests. Areas that are potentially difficult to regenerate due to grass, frost, rockiness, or previous degradation will generally be excluded from harvest, placed in reserves, or harvested lightly so as to be left fully stocked. Rocky knolls are generally reserved from harvest, due to their lack of seedbed for regeneration and tendency to contain priority flora species. Streamside reserves are often widened from their required width to encompass most or all of a riparian vegetation type, which may contain priority flora species and habitat of priority fauna species. Threatened vegetation communities, which usually have had their extent substantially reduced since European settlement, warrant a greater proportion of their extent reserved from harvest. This is reflected in the *SFM Native Vegetation Management Policy*.

Where threatened communities occur within SFM's managed areas, they are excluded from harvest areas and included in designated reserves. In other cases, areas of the identified threatened vegetation type have been included within the harvest area. In these situations, a silvicultural system that ensures the protection and maintenance of the vegetation community, and/or any habitat of threatened fauna species dependent upon that community, is employed.

Threats to HCVs present within SFM's FMUs include:

- damage by introduced plants, animals and disease.
- unplanned fire;
- firewood cutting and unauthorised access;
- disturbance/loss of breeding habitat.
- population fragmentation.
- habitat degradation by domestic stock and/or deer;
- human interference;
- forest operations; and
- natural forces of weathering, decay, windthrow, and tree roots.

SFM makes every effort to protect natural and cultural values (including High Conservation Values). If for any reason damage to such values is caused by SFM's operations; the operation will be suspended without delay and appropriate actions will be taken to restore the values and protect them from any further damage.

6.0 Monitoring of conservation values

6.1 Objective

To determine whether management actions have been implemented effectively and if conservation values are being maintained and/or enhanced, using a method capable of detecting change over time.

6.2 Routine operational monitoring

Natural and cultural values across SFM's managed estate are routinely monitored in several ways, including:

- forest Harvesting Audits performed monthly throughout the harvesting phase: these check compliance against prescriptions written into FPPs / THPs for management of natural and cultural values and results of harvest monitoring are reviewed in annual management reviews:
- forest health checks during Browsing Monitoring, Regeneration Surveys, Progressive Harvest Assessments, and general Forest Health Monitoring programs: results of this silvicultural monitoring are reviewed in annual systems (management) reviews;
- property inspections, performed throughout the year;
- annual monitoring program of FSC Group Scheme sites for compliance with various aspects of the FSC Principles and Criteria; and
- annual auditing by the certification bodies for Responsible Wood and Forest Stewardship Council (summaries of audit visits and findings are available on the SFM website, www.sfmes.com.au).

Tasmania only:

- Certificates of Compliance undertaken at the completion of Roading, Harvesting, and Regeneration phases of the operation (certificates are filed with the Forest Practices Authority and are a legal requirement); and
- audits conducted annually by the FPA on a random sample of the FPPs, checking compliance with all prescriptions (results are published in the FPA's annual report).

6.3 Conservation values monitoring

In addition to the above-listed routine monitoring checks, a more formal commitment to conservation monitoring takes place for FMUs within the SFM Group Certification Scheme to address FSC requirements.

- Natural, cultural and / or high conservation values will be identified through the SFM planning process. These values are afforded a level of management / protection under relevant state / commonwealth legislation. For natural and HCV values, suitably qualified specialists will be engaged to undertake field verification of values which may include such assessments as vegetation condition assessments (VCA) or flora / fauna surveys and make recommendation as to the appropriate management in order to achieve positive ecological outcomes. This information will then be incorporated into management plans to maintain / enhance identified values including ongoing assessment of values over a prescribed timeframe ie VCA undertaken every ten years or following major environmental event ie wildfire and assessment / management of identified threats.

- Natural, cultural and / or high conservation values will be monitored on an annual basis to identify threats to these values and ensure the applied management actions are effective in maintaining / enhancing conservation values. Threats can include new or emerging threats including (but not limited

to) weed infestations, damage by introduced plants, animals and disease, unplanned fire, firewood cutting, habitat degradation by domestic stock and/or deer.

- Any issues detected by the Conservation Values Monitoring program will cause the SFM Corrective and Preventive Action process to be initiated, and appropriate action will be taken to address the problem.
- Results of the Conservation Values Monitoring program will be collated and reported on at the Annual Systems (Management) Review.
- SFM will publish a summary of its annual Conservation Values Monitoring program every 5 years and make this available publicly via its web site.

6.4 Collaborative monitoring projects

In Tasmania, SFM collaborates with the Forest Practices Authority (Tasmania) Biodiversity Program to contribute to their existing programs of monitoring of conservation values. In the Green Triangle (SA, VIC), SFM collaborate with and provide property access to the Nature Glenelg Trust and the Glenelg Hopkins Catchment Management Authority (GHCMA) for environmental restoration and monitoring works. This has the advantage of utilizing specialist skills and expertise and having conservation values within the SFM Group Certification Scheme monitored by independent experts in a standardized manner. SFM also participates in an annual program of wedge-tailed eagle nest monitoring to determine use patterns of nests and breeding success.

Appendix 1. Stakeholder comments and SFM responses May-Sept. 2011

SH	Stakeholder Comment	SFM Response
1	Section 3 – I would like to see an acknowledgment of weeds in this section.	Two sentences added in Section 3.1. Reference to washdown guidelines already given in Section 4.1.
1	Section 3.2 – I would like to see included the Chytrid fungus which is prevalent throughout Tasmania. Could include what does SFM do to prevent spread i.e. on site wash down facilities etc.	Description added in Section 3.2. Action (washdown) added to Section 4.2.
1	Section 3.3 Would like to see acid-sulfate soils included in this section.	Description added in Section 3.3 and management actions added in section 4.3. A check of TheList map coverage for Acid Sulfate Soils has been added to the SFM planning process.
2	Please find attached my version of the Aboriginal cultural heritage section for your management plan. I am happy to discuss it further if you feel anything is not clear or requires amending.	Attachment included in full in Section 3.4.
2	Re: Legislation covering aboriginal heritage management: "…I think it best to cover all the bases so if/when the document is viewed by Aboriginal community members it is all encompassing."	Relevant legislation now included in section 4.4.
3	I think it is a well considered approach and note that SFM is going beyond the requirements of the forest practices system in the management and monitoring of natural values and 'high conservation forests'. I support your intention to link monitoring of conservation values with monitoring programs being run by the FPA.	See section 5.4 for discussion of collaborative monitoring projects.
3	Under Commonwealth-listed Ecological Communities on p. 8. There are 3 communities that occur in Tasmania.	Included in list in Section 3.6.

SH	Stakeholder Comment	SFM Response
	'alpine Sphagnum bogs and associated fens' was listed in 2009 under EPBC.	
3	Table 2 Masked Owl suitable habitat…Better to say something like 'eucalypt forest with old growth components, specifically hollows, cracks or cavities.'	Correction made in Table 2.
4	General: "…I would like to respond in generally congratulating SFM in taking the initiative a responsible step to seek potential FSC Certification for precautionary based, responsible forest management. I take special note of statements such as: "…SFM has adopted the precautionary approach of exclusively using various forms of partial harvest, rather than clearfell,…[in threatened forest communities]"	Comment appreciated.
4	General: I would like to suggest that the planning horizon be short, medium and long term and that cutting intervals should be based on optimum flexibility and care for maintaining the continued production of the growing forest stock. This optimisation approach could lead to shorter intervals of re-visits in whole stand management, consequently harvesting less at each time but more often.	Silvicultural regimes are targeted to maintaining viable forest communities while running cost-effective operations. See SFM Forest Management Plan for more discussion of average rotation lengths and harvest volumes.
5	Page 4 – 3.6, line 1 'outstanding critical importance' – What does this mean ? – clarification needed.	Additional clarification has been placed in text.
5	Page 5 – 3.6, HCV1 – "Forest areas containing….", Line 2 – Note that 'threatened' includes rare, vulnerable and endangered' and that under the Tas forest practices system all threatened species are treated the same regardless of threatened status. In this way SFM is meeting this criterion which only refers to 'endangered' species".	Additional clarification has been placed in text.
5	Page 5 – 3.6, HCV1 Second paragraph – I would include species groups listed as priority species in App 2 of RFA,	SFM recognises the intent of the comment but notes that the management of priority species groups referred to in

SH	Stakeholder Comment	SFM Response
	such as hollow-dependent species, cave fauna, aquatic species. Hollow-using species as a group are of high conservation significance because of their dependence on tree hollows for refuge and nesting. Such fauna are known to be amongst those most likely to be impacted by forestry activities.	Attachment 2 such as hollow-dependent fauna, karst species and aquatic species was linked to the provisions of the Forest Practices Code. This document already outlines how threatened species (e.g. threatened hollow-dependent, karst and aquatic fauna) are managed, and how SFM takes a precautionary approach to management of other values
5	Page 5 – 3.6, HCV1 Final paragraph - Forest Botany Manual (should have citation – FPA, 2005). This comment applies throughout, see also for RFA and where other policy and planning tools mentioned.	Botany Manual and other planning manual citations made.
5	Page 6, Second para, line 6 – 'listings' replace with 'descriptions'. Mention that the potential habitat descriptions are developed in consultation with species specialists an endorsed by DPIPWE and FPA. Their development follows the Agreed Procedures.	Stakeholder comment incorporated.
5	Line 3, Replace 'prime habitat' throughout with 'significant habitat'. Use definitions of habitat agreed and used in FPA Planning Guideline 2008/1 (one that guides retention of threatened fauna habitat in proposed conversion operations) and in revised TFA. You could add a definitions section at the start of this report to help the reader.	Descriptions of habitat clarified. Definitions provided in text. Citation for Planning Document added.
5	Second Para, line 7 – Replace '…but nest sites and potential nesting and foraging..' with '…but nest sites and potential breeding-habitat (includes nesting and foraging habitat within the breeding range)…'.	Stakeholder comment incorporated.
5	Page 7, HCV2 – "Forest…." Line 4 – delete 'context'. Remnants should be included as HCV.	Remnants do not, in and of themselves, fit within the HCV3 definition.

SH	Stakeholder Comment	SFM Response
5	Page 8 – HCV3 – This could include cave systems (not sure if you have any), oldgrowth, relic rainforest, remnants?	None of these environments currently included in FMUs. See SFM Native Forest Management Policy.
5	Page 10 2nd paragraph – To be precautionary these streams should have a 30m SSR. Alternatively see recommendation in sub-objectives Table of Biodiversity review report (page 137) – maintain a % of class 4's unharvested within each sub-catchment	SFM recognises the intent of the comment and notes that in relation to any aquatic HCVs (e.g. where threatened aquatic fauna or riparian vegetation types are identified from the FMU), these will be managed in accordance with recognised policy such as the recommendations delivered via the *Threatened Fauna Adviser* or as required by legislation – where this requires extension of SSRs, this will be applied. Application of a "blanket" expansion of SSRs to 30 m in additional situations is not supported at this stage.
5	Page 11 – first line – I would reword and make sure the 'Duty of Care policy' under the Code is clear here.	Additional clarification added in text.
5	Page 11 – 2nd para – What about habitat clumps? Need something about measures for hollow retention. For general approach under FPsystem see FEM paper …	Additional clarification provided in section 4.0.
5	Maps illustrating the location of WHSs on large properties would be useful	Maps of individual properties and FMUs are maintained for planning and operational purposes, but are subject to commercial-in-confidence restrictions. An indication has been made to certain stakeholders that property-specific information may be provided upon landowner consent and the signing of a Confidentiality Agreement.
5	Table 2 – reference FPA(2002)(TFA) and note that this Table provides a brief summary of the key actions. For full actions in different scenarios are delivered by the TFA, FPA(2002).	Change made in Section 4.2 to reflect stakeholder comment.

SH	Stakeholder Comment	SFM Response
5	Table 3 –The 'Precautionary approach' measures are ones that are required under legislation. Move most back into the 'Protection measures' column. Make sure the precautionary measures are over and above Code and associated planning tool requirements. Turn should into wills. Some suggestions below – GPH – Management of hybridisation and European wasps – See Surrey hills management plan. DOV – Move final para about SP into protection measures column – rest OK DGL – move into protection measures – Restoration of E.glob dry forest remnants to aid connectivity could be a precautionary approach. Swift parrot – move all into protection measures column – Could have 'contribute to swift parrot monitoring by DPIPWE as precautionary approach. Golden g – Move all into Prot measures column – Could have 'headwater restoration' as prec approach. WTE - Move all into Prot measures column – Could have 'no activity checks' or 'restoration of reserves' in HCV area or 'contribute to eagle nest monitoring project' as prec approach. PTT - Move all into Prot measures column – could have wasp control, grassland management as precautionary approach – talk to Gunns re Surrey Hills. Mt Art – Restoration of SSRs in catchments where species occurs – precautionary. All pre-op surveys are part of standard protection measures	Table 3 edited to reflect precautionary approaches taken.

SH	Stakeholder Comment	SFM Response
5	Page 21 – 5.1 – Objective I suggest a rewording to - 'To determine whether management actions have been implemented effectively and if conservation values are being maintained and enhanced.'	Suggested wording incorporated.
5	5.2 Suggest change to - Routine implementation monitoring (includes Compliance monitoring)	Changed to "Routine Operational Monitoring".
5	5.2 - Move dot point two to 5.3	Left as is – more relevant to operational monitoring.
5	5.3 Suggest addition of Conservation Values monitoring – Effectiveness monitoring	Left as is, effectiveness monitoring mentioned in text.
5	Add monitoring of effectiveness of hollow retention measures to 4.2.	Monitoring is covered in Section 5.4.
5	5.4 – I would call this collaborative monitoring projects. Make it clear that this is 'effectiveness monitoring'. This work would be done in collaboration with FPA, University of Tasmania, CRC Forestry and DPIPWE.	Change to title of section made.
5	References - If you include Hollow fauna then see reference list in Hollows booklet. - You could add … swift parrot paper from Aust Zool.	Hollows booklet is a general guideline only – not required to be cited specifically in this document. Swift parrot paper acknowledged as good background material but no requirement to cite in this document.
6	Firstly the focus on legislative norms as being the measure of meeting the principles and criteria does not work. We do not accept that legislative norms or the current forest practices system in Tasmania is FSC compliant or should be used as a measure of compliance (other than off course Principle 1) and more particularly we do not believe it constitutes a FSC standard for conservation	The forest practices system provides a framework for all forest management within the State. Some aspects of the system contribute to SFM's ability to address the FSC Principles and Criteria and the Woodmark Standard.

SH	Stakeholder Comment	SFM Response
	planning or FME forest management system to address HCV.	
6	In particular this approach is especially poor at dealing with issues of landscape scale conservation matters meaning that wider ecosystem health and function issues and fauna species requirements are particularly poorly addressed.	The forests in which SFM operates generally have a long history of human disturbance, and the low-impact selective logging techniques employed are not stand-replacing events. See also addition of SFM's Native Forest Management Policy.
6	Setting the bar on legislated documents as being the only source of flora and fauna species with HCV 1 values is not acceptable. As indicated, at the very least other work resulting from government, academic and other professional and expert assessments need to be considered and addressed.	This comment was discussed with the stakeholder and no specific suggestions of additional species were made. Additions to the Natural Values Database by members of the public are commonly made. There is an existing process for any person to nominate a species for listing under State and Commonwealth threatened species legislation – if any such species is listed, as information and guidelines become available, SFM will apply these to forest management, as outlined in the document.
6	The assessment taken in the report on HCV 2 is dismissive of the potential for these values to exist based largely on lack of existing state-wide assessments. It is likely that many areas of native forest in Tasmania will have HCV 2 values as they are either part of the extensive tracts of natural ecosystems in the state or important remnant forests in remaining areas.	Additional discussion of this point has been added in Section 3.6.
6	In regards to HCV 3 the assessment that logging in threatened forest communities is going to be undertaken by SFM is not supported. This organisation] is strongly of the view that the conservation of threatened forest communities is not enhanced by allowing logging operations to occur in them.	Harvesting in HCV3 communities is consistent with the FSC Principles and Criteria and guidance publications produced by Proforest. The Proforest definitions of the 6 HCV classes have been accepted by FSC International.

SH	Stakeholder Comment	SFM Response
6	As I mentioned in our meeting the clear way to address a good number of these issues would be to utilise the commonwealth government funded Regional Ecological Management system developed for property level conservation management while comprehensively addressing the landscape context. We consider this to be the best available approach to address these issues in a FSC context. I appreciate that you indicated in our meeting that you would not likely undertake this approach but again I would point you in this direction in order to be able to produce a management and documentation regime in which we have confidence that FSC standards are being met.	The REM is one tool that is available. SFM believes that the suite of planning tools described in this document and the SFM Forest Management Plan do an equally effective job and are more suitable to our non-contiguous estate.
7	I see no evidence you have surveyed or considered prescriptions for the management for old-growth forest remnants.	The SFM Native Forest Management Policy refers to old-growth.
7	It is important that you have evidence beyond RFA data for claims of no oldgrowth	Field surveys of each property are done to identify forest communities and structure. Vegetation mapping is assessed by specialists and retained.
7	…how are you planning to deal with the inevitable small patches of rare, threatened and poorly reserved communities within the estate	The SFM Native Forest Management Policy refers to rare, threatened and poorly reserved communities.
7	I suggest you consider undertaking some survey work	Field surveys are performed for every property as part of the planning process. This is stated in the document and has also been communicated to the stakeholder in question.
7	…you explicitly state that you will only consider species and ecosystems that are the subject of legislation and rule out taking any other sources as authoritative. This is not consistent with best practice for FSC certification	This comment was discussed with the stakeholder and no specific suggestions of additional species were made. Additions to the Natural Values Database by members of the public are commonly made.

SH	Stakeholder Comment	SFM Response
		There is an existing process for any person to nominate a species for listing under State and Commonwealth threatened species legislation – if any such species is listed, as information and guidelines become available, SFM will apply these to forest management, as outlined in the document.
7	I believe that the geo-locational information you have provided is not adequate to allow for the testing of assertions in the document. You need to provide maps that show property boundaries and as an absolute minimum the forests that are the subject of the proposed certification.	An improved, locator-type map was provided at a meeting attended by this stakeholder. Due to the third-party nature of property ownership within the Group Scheme, such information is subject to commercial-in-confidence restrictions. An indication has been made to certain stakeholders that property-specific information may be provided upon landowner consent and the signing of a Confidentiality Agreement.
7	I strongly recommend that you move to a property planning based approach rather than a logging planning based approach that uses the forest practices system as a template.	Harvesting boundaries within a property are the product of landowner input and preference as well.
7	HCV1: The document seeks to establish that current legislation, regulations, guidelines and prescriptions will be adhered to and that these values will be identified as plans for logging are drawn up. This approach is neither precautionary or best practice.	It is important that legal requirements are identified in the initial part of the planning process. Prescriptions and their implementation are, in practice, often much more restrictive than required by law.
7	I understand that you do identify areas for exclusion but what is the long term fate of these areas?	As explained in section 4.0, these areas become classified as "vulnerable land", essentially creating reserves in perpetuity. See section 5.0 for monitoring program to be implemented in reserved areas.
7	HCV2: …it would also appear that a number of the properties are adjacent or close to large contiguous	Adjacent reserves are one of the issues checked in the planning process. The nature of the silviculture employed

SH	Stakeholder Comment	SFM Response
	tracts of reserves and or state forest. Which may or may not meet this criteria.	ensures that environmental impacts on reserves are avoided.
7	HCV3: …examine the published work that was done by Bushcare as part of the NHT to look specifically at the conservation values of forest within this IBRA. A regional ecosystem approach would act as an appropriate surrogate.	SFM attempted to locate these works and was unable to do so. This was explained to the stakeholder at a face-to-face meeting and in a subsequent email. No further information was provided.
7	HCV3: IT IS COMPLETELY UNACCEPTABLE THAT YOU ARE CLEARLY POROPOSING TO LOG SOME OF THE MOST ENDANGERED FOREST ECOSYSTEMS IN TASMANIA. I and the engo community as a whole would expect that these threatened forest ecosystems are protected by conservation covenant or as a minimum conservation management agreements.	Harvesting in HCV3 communities is consistent with the FSC Principles and Criteria and guidance publications produced by Proforest. The Proforest definitions of the 6 HCV classes have been accepted by FSC International.
7	HCV4: I am strongly supportive of your decision to go beyond the regulatory norm in terms of the protection of Class 4 streams.	Comment appreciated.
8	Phrasing changes suggested to Section 3.4.	Suggested phrasing incorporated.
8	Add EPBCA to list of relevant legislation related to management of indigenous culture.	Added to list.