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Phone Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(optional)*

**Do you agree to have your comments anonymously published by Forico ?** **Yes / No**

**Do you wish your feedback to remain private and confidential ? Yes / No**

**Forico Management Activity**

Plantation inputs have been supplied in recent years from the following non- FSC**®** certified suppliers:

* AKS Forest Solutions;
* SFM Forest Products (including the Lenah Estate);
* Reliance Forest Fibre; and
* Private small, low intensity, managed forests (SLIMFs) from time to time.

Forico may utilise these and other suppliers within Tasmania from time to time, in accordance with the controls present in Forico’s Due Diligence System. Irrespective of who the Supplier is, the protocols detailed below must be complied with.

**Overview of Control Measures**

Forico only sources plantation material from Forico-managed certified plantations and third-party Suppliers from industry / other private plantations in accordance with the Forico Environmental Sustainability Policy, Forico Stakeholder Engagement Policy, and the Forico Chain of Custody Standard aligned to the Due Diligence System.

Forico will complete a Supply Chain verification on HCVs for all its suppliers using the FSC Australia **High Conservation Values (HCVs) Evaluation Framework** and the associated National Risk Assessment, HCV databases to be referenced ([FSC Australia Controlled Wood Risk Assessment](https://fsc.org/en/document-centre/documents/resource/396)).

Prior to receiving any plantation material from a Supplier, a detailed planning process must take place to prepare a certified Forest Practices Plan (FPP). The FPP must be certified by a Forest Practices Officer (delegated authority under the Tasmanian *Forest Practices Act 1985*) and signed by the landowner and applicant.

Independent FPP compliance audits are conducted by the Forest Practices Authority of all third-party Suppliers in Tasmania, and the results are published within the publicly available Forest Practices Authority (FPA) Annual Report.

Forico will undertake annual verification assessments of third-party Suppliers (referred to as the Verification Audit). Forico’s Verification Audit addresses all HCV criteria (1 – 6) not simply those restricted to FPP obligations.

During the annual Verification Audit, verification is conducted by viewing operational plans and maps, natural values evaluation, and confirming conformance to prescriptions within the FPP and requirements in the *Forest Practices Code 2020* during field audits. Verification audits are conducted either by Forico or an independent third-party consultant.

Field Verification Auditors inspect (i) HCV classes at each forest plantation assessed to confirm that the Supplier is adhering to the HCV provisions in their Forest Practices Plan; and (ii) that the wood harvested from the operation is not being harvested from forest native forests being converted to plantations or non-forest use. This evidence is used to validate the risk assessment.

**HCV 1. Species Diversity.**

Third Party Suppliers interrogate publicly available maps, overlays and databases to identify any threatened flora / fauna species as listed on the Tasmanian *Threatened Species Protection Act 1995* (TSPA) and the Commonwealth *Environment Protection and Biodiversity Conservation Act* (EPBCA)inhabiting or adjacent to the plantation operation. Forico interprets that “threatened” is used generically to refer to species listed as rare (Schedule 5), vulnerable (Schedule 4), endangered or presumed extinct (Schedule 3) of the TSPA; and as Vulnerable, Endangered, Critically Endangered and Extinct under the EPBCA.

Spatial data is accessed through publicly available GIS databases to determine HCVs, using internal and external data sources of known locations or habitat suitability, for example (including but not limited to) Natural Values Atlas, Biodiversity Values Database, TasVeg, Habitat Suitability Mapping.

These databases also help to generate the FPP Map including the identification of values within and adjacent to the operational area.

During the preparation of a FPP, site assessment, planning and mapping must evaluate and determine the identification of all natural and cultural values, and ensure appropriate management of HCVs present. Where HCVs are present within or adjacent to the operational area, prescriptions must describe operational constraints to maintain or enhance the values present. Where required, control measures must be implemented through consultation with FPA technical experts and other stakeholders (e.g. specialists from DPIPWE).

Values noted in the data search may or may not be present in the plantation so field assessment is required to check if listed habitats and values are present within the operational area. For example, eastern barred bandicoot sightings might be noted in the data but the ground truthing exercise will confirm if their habitat (e.g. open grassland) is present in the plantation area. If the habitat is not present, then the prescription is not applied.

For each threatened fauna species with potential habitat or known sites in or adjacent to the operational area, the Threatened Fauna Adviser decision-support system maintained by the Forest Practices Authority is consulted, providing prescriptions for forest management where specific species and values are present. The advice is based both on State and Commonwealth legislation including relevant recovery plans. The third-party Supplier, when developing the FPP, will include necessary measures to manage any species found within the plantation area. If a natural value is noted as present in the planning field assessment the prescription is applied and included within the FPP. In addition, the FPA expert may be consulted and provide additional advice to be incorporated in the prescription.

The field assessment process also has considerations for adjacent areas. For example, if a wedge-tailed eagle nest is present close to a plantation and may be impacted by harvesting activities (i.e. disturbance).

If during the field assessment exercise something is discovered that was not mentioned in the data search, appropriate prescriptions are implemented and the FPA expert is notified to advise on the prescription.

Areas of remnant native vegetation, waterways and associated riparian zones within a plantation are clearly identified on harvest plans and associated maps and are excluded from harvesting operations in line with the *Forest Practices Code 2020* and FPP.

**Do you have any comments regarding whether these controls are sufficient at managing these values during harvesting operations? Are further controls needed?**

*Your comments*

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**HCV2. Landscape Level Ecosystems and Mosaics.**

Operations are predominantly located within modified landscapes which are mosaics of agriculture, plantation forestry, and natural forest. Due to the scale and intensity of the these operations, HCV 2 are generally considered to be not applicable given that no large landscape level values are present.

Most third-party Suppliers are generally within the Small Low Intensity Forest Management (SLIMF) definition prepared by FSC Australia. As such there are no large landscape-level forests within these areas.

However, if the plantation is adjacent to a large intact native forest, there are considerations such as the control of potential weeds or wildlings are incorporated into future forest management obligations.

**Do you have any comments regarding whether these controls are sufficient at managing these values during harvesting operations? Are further controls needed?**

*Your comments*

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**HCV 3. Ecosystems and Habitats.**

The process for identifying HCV 3 values is the same as for identifying HCV 1 values since the various data sources are legislated to maintain or enhance populations of rare, threatened and endangered ecosystems. Spatial data is accessed through publicly available GIS databases to determine HCVs, using internal and external data sources of known locations or habitat suitability – e.g. Natural Values Atlas, Biodiversity Values Database, TasVeg, Threatened Fauna Adviser, Habitat Suitability Mapping, and Land Information System Tasmania (LISTmap – spatial information regarding ownership, watercourses, contours, land use, etc).

Forico’s interpretation of HCV 3 comprises vegetation types listed as threatened ecological communities under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA), or as threatened vegetation types under Schedule 3A of the Tasmanian *Nature Conservation Act 2002* (NCA).

Areas of remnant native vegetation within a plantation are clearly identified within FPP’s and associated maps and are excluded from harvesting. Both remnant vegetation and wetlands may provide refuge / habitat for native / migratory species. Such areas are excluded from operational activity.

Any remnant vegetation and wetlands providing habitat for native or migratory species are excluded from operational activity. Streamside Reserves (SSR), Machinery Exclusion Zones (MEZ) and Wildlife Habitat Strips (WHS) are incorporated within the preparation of the FPP in accordance with the *Forest Practices Code 2020*.

Specifically, with respect to watercourses, soil and water riparian zones:

* areas must be excluded during operations and waterflow must remain unimpeded;
* roads must be constructed and maintained to minimise the potential effects of erosion;
* watercourses must be crossed at designated crossing points; and
* harvesting prescriptions relating to wet weather limitations must be detailed within the FPP.

**Do you have any comments regarding whether these controls are sufficient at managing these values during harvesting operations? Are further controls needed?**

*Your comments*

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**HCV 4. Critical Ecosystem Services.**

Forico has undertaken a detailed internal analysis of plantation distribution within all Tasmanian water catchments (Refer to the publicly available *Forico HCV Assessment and Management Plan* on the Forico website). The Tasmanian Geoconservation Database (TGD) – available through the publicly available Land Information System Tasmania (LISTmap) website – provides spatial information with respect to geological and geomorphological features. Other useful spatial information available in this website includes (i) soil type; (ii) contours; (iii) elevation; and (iv) watercourse location. All these data input categories can determine whether watershed protection and erosion control will be impacted by operational activity.

For water values, there is an initial check to observe if there is any impact on town water / domestic water catchments. If there is a town water supply in the catchment there is an obligation under the *Forest Practices Code 20*20 to implement control measures to mitigate any risk.

The FPP classifies watercourses within the operational area based on the size of the water catchment present. The size of the buffer is dependent on catchment size but also sometimes other values such as the fauna / flora species present, soil type / erodibility classification present. Control measures include the width of the buffer to be applied and restrictions on machinery to prevent issues like sedimentation downstream.

There is also an evaluation of geology and erodibility of soils. The *Forest Practices Code 20*20 specifies the type of machinery that can be used depending on the degree of slope and soil erodibility.

Fire plans are developed as part of the forest practices planning. Burning outside the fire permits period requires an official notification to the Tasmanian Fire service.

Fire breaks are in place and kept open as a requirement of the *Forest Practices Code 2020*.

For roads and landings, the *Forest Practices Code 2020* prescribes standards that must be met. If developing a new road, prescriptions and conditions applied. These will vary depending on the type of road for example a new temporary road used only in the summer the requirement may be to restore the road after the harvest is over. For existing roads, there are requirements to maintain culverts and drainage. In addition, landing sites are restored after the harvest.

Geology and slope maps are used to identify soil and erosion risks. These are confirmed during field assessments.

The *Forest Practices Code 2020* requires issues like slope protection, erosion control, setbacks applied to waterways, access tracks, roads, stream crossings, log landings and stream crossings to be addressed.

**Do you have any comments regarding whether these controls are sufficient at managing these values during harvesting operations? Are further controls needed?**

*Your comments*

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**HCV 5. Forest Areas Fundamental to Meeting Basic Needs of Local Communities.**

Plantations that are located upstream or within 2 kilometres of a town water supply are identified using the Earth Science planning tools of the Forest Practices System.

<https://www.fpa.tas.gov.au/>

The information captured relates to HCV 5. The assessment identifies catchments, town water supplies and plantations upstream from drinking water catchments. Draft prescriptions are developed, that are assessed for appropriateness by the expert within the FPA and liaison with the local council (if required).

Forico has undertaken a detailed internal analysis of plantation distribution within all Tasmanian water catchments (Refer to the publicly available *Forico HCV Assessment and Management Plan* on the Forico website). The analysis accounts for all land use activities / practices conducted throughout the relevant catchments (plantation forests, native forest, agriculture etc). This internal dataset is reference during the verification process to determine that the impacts of the plantation management activity at a catchment level is adequately addressed.

**Do you have any comments regarding whether these controls are sufficient at managing these values during harvesting operations? Are further controls needed?**

*Your comments*

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**HCV 6. Cultural Values.**

When addressing traditional cultural identity (Aboriginal heritage), an external database called the Aboriginal Heritage Register (AHR) is used to investigate and determine the identification of any known Aboriginal sites. Third parties can access the Aboriginal Heritage Property Search to determine whether there is a need to seek further advice about Aboriginal cultural heritage in an identified area.

Aboriginal Heritage Tasmania regulates Tasmania’s unique Aboriginal heritage and manages the AHR. Any known sites are protected by law (Tasmanian *Aboriginal Heritage Act 1975*). A planning and mapping process to identify and evaluate areas containing potential HCVs, specifically Aboriginal sites in high sensitivity zones, must be undertaken before any development activity commences.

The “[*Procedures for Managing Aboriginal Cultural Heritage When Preparing Forest Practices Plans*](https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0004/225346/Procedures_for_managing_Aboriginal_Cultural_Heritage_Forest_Practices_Plans_version_1.12.pdf)” is a document used to address Aboriginal cultural aspects of forest management in Tasmania.

Historical cultural heritage (predominantly European) is coordinated through Heritage Tasmania who manage the Tasmanian Heritage Register (THR). The “*Procedures for Managing Historic Cultural Heritage when Preparing Forest Practices Plans*” provides comprehensive instructions when protecting historic cultural heritage sites.

Consultation with an expert is required to confirm management of known sites through prescriptions that are included within the FPP and communicated to operators. If Aboriginal sites / artefacts or European cultural heritage are identified during operational activities, exclusion zones are immediately located around the respective site for maintenance of site integrity, with the appropriate specialist / regulator are contacted to seek their advice and guidance on future management requirements.

**Do you have any comments regarding whether these controls are sufficient at managing these values during harvesting operations? Are further controls needed?**

*Your comments*

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**Do you have any other comments you would like to communicate regarding the Supply Area or any of the Suppliers that sell plantation material to Forico?**

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**Thank you for your time. Forico will provide a written response to all participating stakeholders on how their comments were considered within 60 days following the submission date.**