



## tasmanian conservation trust inc

Amanda Boyd  
FSC Australia  
GPO Box 152  
Melbourne VIC 3001

15 December 2009

Dear Amanda,

### **Lagoon of Islands FSC application**

On 4 November 2009 the Tasmanian Conservation Trust (TCT) received an email from Emily Blackwell from the Soil Association inviting us to comment on the Lagoon of Islands FSC application. Following our request on 4 December for further information, we were provided with a copy of the document 'A Forest Stewardship Council compatible management plan for the 'Lagoon of Islands' property in the Central Highlands of Tasmania', November 2009.

Our comments relate to the above document and we will refer to it as the 'management plan'. We prefer to make comment in a letter format rather than on the 'Stakeholder Consultation form provide' by The Soil Association'.

The TCT has been involved for a number of years in consultation with the owners of Lagoon of Islands property in regard to management of their forests and other values. The TCT welcomes the opportunity to comment on this FSC application, especially as it is the first such application from Tasmania.

In broad terms the TCT strongly supports the management plan and the FSC application. We have a series of comments but most of these are minor in nature and hopefully can be used to improve this excellent management plan.

### **General comment**

We have identified a series of typos, layout error etc but would prefer to provide these directly to the consultant who prepared the management plan.

### **Nature conservation area criteria matrix**

The TCT supports the 'Nature conservation area criteria matrix, Lagoon of Islands' as defined in Table 13. We endorse the 'fair share' principle, aimed at meeting shortfalls on CAR reserve targets, and the underlying goal to address the current 'reservation bias' on the property. We support the use of vegetation types and

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land units within each land system, to, as stated in the management plan, “help ensure areas protected as representative examples on the property have a greater certainty of contributing to biodiversity conservation” (page 59). The 100m buffer recommended in Criteria 9 is especially admirable.

### **6.1 Forests and Forestry Areas**

The TCT is concerned regarding the recommendation that tourism development will be permitted in all zones (presumably including Nature Conservation Areas). We would appreciate being consulted further (as suggested in the management plan) regarding this issue as we believe even well regulated tourism development can have significant impacts, many of which are not subject to regulatory control or are very difficult to control.

If tourists are permitted to bring their pet dogs or hunting dogs they can potentially disturb or kill wildlife. Hunting dogs have recently gone wild in the Central Highlands and become a major environmental and human safety issue. Tourists could bring vehicles from around Tasmania and Australia and this is a potential source of weeds and Phytophthora. Similarly, fishing gear is a potential source of introduced species such as ‘Didymo’.

#### Wood production

We note the biodiversity provisions of the Forest Practices Code are currently under review and they are likely to be finalised at the end of 2010. The management plan may need to be revised sooner than planned depending on the outcomes of this review. The consultant may be able to make mention of this review and pre-empt likely impacts on the Lagoon of Islands property e.g. likely reduction in maximum coupe size.

#### Nature conservation

We note the absence, in this section, of any reference to Aboriginal or European cultural values. The need for further work in regard to Aboriginal values is mentioned on page 68.

#### Forests – special

The proposed trial to re-establish forest at Jillett's Tier is admirable. The TCT suggests that other land owners with similar problems be informed and involved during the planning and implementation phases and perhaps this could be mentioned in the plan. Field days before and after forest reestablishment could be considered.

### **6.3 Synopsis of nature conservation outcomes**

As state in the management plan, the “proportions of both vegetation communities and land units that have been designated for Nature Conservation on the property generally well exceed the guidelines set for the planning processes” (page 63). We congratulate the owners on the impressive conservation outcomes which are recommended.

In particular, we note following exceptional areas and proportions of vegetation communities proposed for nature conservation:

- *E. delegatensis* dry forest and woodland – 1,956 ha (49%)
- *E. delegatensis* dry forest and woodland old growth – 102 ha (100%)
- *E. gunnii* woodland – 16 ha (100%)
- *E. pauciflora* forest and woodland on dolerite – 297 ha (44%)
- *E. rodwayi* forest and woodland – 222 ha (85%)

- Lowland grassland complex – 76 ha (81%)

## **7. Management actions and implementation**

We acknowledge the numerous recommendations which exceed what would normally be expected of the owners.

We note the recent changes to Tasmania's vegetation clearing system – see attached Forest Practices Amendment Regulations 2009. These changes give greater importance to the need for this management plan to be approved by the Forest Practices Authority. The regulatory changes mean this plan would be the only means of controlling vegetation clearing for establishment of some forms of infrastructure [see section 5(L)].

Throughout this section of the management plan there are recommendations for monitoring without specifying who will do it. The TCT recommends the plan specify who will do monitoring e.g. property owner, volunteers, logging contractors or a consultant, and how this is to be resourced.

### **7.1 General aspects of management**

Issue: Formalise identification of management issues

The TCT suggests use of on-ground markers be considered to for sites of high importance and sensitivity e.g. threatened species sites. We note this is recommended in section 7.3 in regard to forest practices and should also be used for conservation management.

### **7.4 Environmental**

Issue: Contribute to the CAR reserve system for forests

We strongly recommend the wording be changed to refer to 'legally binding and perpetual conservation covenants'.

We note that the Forest Conservation Fund has ceased operations in Tasmania.

Issue: Address impacts of stock grazing in Forests and forestry areas

Are numbers of fallow deer and native browsing animals also being monitored?

Issue: Contribute to statewide knowledge of biodiversity

We are concerned that it will be very difficult to ensure consistency and accuracy of record collection among the wide range of likely visitors to the property.

Issue: Protect and enhance habitat of threatened species

The TCT would appreciate being consulted on the "specific management actions for threatened species" when they are developed.

Issue: Environmental weeds

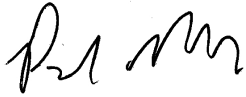
The management plan should recognise agricultural weeds as well as environmental weeds.

Please note the recently formed Tasmanian Weed Alert Network and the creation of a Tasmanian weed alert species list. The property owner and others involved with weed management may wish to become involved with this Network and become familiar with these species. Many of the weed alert species are not yet declared but pose a potential major threat to Tasmania's environment and

agriculture. The Weed Alert Network Project Officer, Jonah Gouldthorpe, can be contacted at the TCT office.

In regard to Ragwort, it is vital the management plan reinforce the need for intensive management just prior to flowering and before seeding e.g. need to revisit each known infestation every week or fortnight at the outside during this period.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter McGlone', written in a cursive style.

Peter McGlone  
Director

**Attachment:**

Forest Practices Amendment Regulations 2009

cc Emily Blackwell, The Soil Association