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Dear Minister Groom,

I write to you on behalf of the Ecological Society of Australia (ESA) with regards to the Tasmanian Government's Policy for Maintaining a Permanent Native Forest Estate (PNFEP).

The ESA is the peak organisation of professional ecologists working in universities, industry and Government with over 1200 members nation-wide. Two of the ESA's objectives are to (1) foster conservation and ecological management of native biota, and (2) advise government agencies where ecological principles may be relevant to decision making.

The ESA is concerned that recent amendments to the PNFEP substantially water down protections for remaining native forests in Tasmania and King Island.

I note that previously the PNFEP required retention of 95% of the forest estate present in 1996 but that in the 2017 revision this requirement has been dropped. The now-missing clause previously set a limit to wholesale land clearing, acting as an essential protection against habitat loss. Habitat loss remains the world's biggest threat to biodiversity and strong protections like the threshold set in the RFA are critical to protect biodiversity, to meet the forest conservation objectives of the RFA and to meet Australia's obligations as signatories to the Convention on Biological Diversity.

The changes to the PNFEP now permit land-holders to clear up to 40ha of their property every year for agricultural purposes, with the potential to clear up to 200ha at once within a five year window. This policy effectively nullifies the limitations on total land clearing originally imposed by the RFA. While the 2017 policy claims that it does not permit broad-scale clearing, allowing 40ha to be cleared per property per year will effectively lead to ongoing landscape transformation.

Changes to land clearing policy in relation to King Island are particularly concerning. King Island has less than 30% native vegetation cover, yet the Tasmanian Government will allow further land clearing. Given the extent of forest loss on King Island and its isolation from potential sources of colonists should local extinctions occur, banning all forest clearing is important to avoid escalating the risk of biodiversity loss.

In order to protect our native biodiversity, the ESA urges the reinstatement of the limits to land clearing agreed to in the RFA and an immediate ban on clearing on King Island.

Don Driscoll.

Professor Don Driscoll
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