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# **AUSTRALIAN PLANTATION PRODUCTS & PAPER INDUSTRY COUNCIL (A3P) SUBMISSION**

## **ON THE**

## **VICTORIAN TIMBER INDUSTRY STRATEGY**

## **- PUBLIC CONSULTATION DRAFT.**

Timber Industry Strategy  
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Thank you for the opportunity to make a submission to the Victorian Timber Industry Strategy - Public Consultation Draft (VTIS).

### ***Australian Plantation Products & Paper Industry Council (A3P)***

A3P is the national industry association representing the interests of all segments of the plantation-based wood products and paper manufacturing industry. A3P member's employ more than 13,500 people in plantation management, sawmills, panel board and paper manufacturing plants, mainly in rural and regional areas. Each year A3P members create and sell more than \$4 billion of products, produce more than 12 million cubic metres of logs, 3 million cubic metres of sawn timber and more than 2 million tonnes of paper.

In Victoria, the plantation, wood products and paper industry manages approx. 422,000 hectares of plantation (22 per cent of the national resource), operates five major paper-making facilities, four large sawmills, two panel board manufacturing sites and numerous smaller wood processing plants and export facilities. The volume of wood harvested from Victoria's plantations (and therefore the associated economic activity) will increase significantly in the near future resulting in continued steady increases in plantation processed fibre and sawn timber production, and the increase in exports of hardwood fibre.

As a result A3P (on behalf of its members) has a keen interest in the VTIS process, and believes it is timely to develop and implement a strategic framework and direction for the Victorian timber industry for the next 20 years.

### ***A3P and the draft VTIS***

A3P endorses the proposed vision for Victoria's Timber Industry *"A productive, competitive, sustainable timber industry, based on secure and sustainable native and plantation forests, that fosters strong Victorian communities"* and endorses the ongoing commitment that the new strategy will not:

- Significantly interfere with the operation of commercial markets in Victoria;
- override existing Codes of Practice for the timber industry that have been put in place to ensure its environmental sustainability; or
- propose changes to the reserve system.

A3P notes that the VTIS vision promotes:

- Responsiveness to change;
- Flexibility and adaptability to capitalise on opportunities;
- Improvement in productivity and competitiveness;
- Adoption of new technology;
- Focus on both supply and demand for wood products; and
- Understanding and responsiveness to community expectations.

A3P supports the new approach by the Victorian government in which the regulatory framework facilitates investment certainty, promotes innovation, and value generation. Once these settings are optimal, and in place, it will allow markets to operate without further significant intervention.

The plantation timber industry is particularly interested in long term strategies because of the long timeframes and critical mass requirements for investments in plantation growing, wood products processing, and pulp and paper manufacturing. To be effective, stable and relevant over time the new VTIS must be based on science, rational analysis, good policy, and not emotion.

This submission will comment on actions identified within the VTIS however some general points of great importance to A3P members to be recognised by the Victorian Government are:

- The role of the timber industry in reducing the national wood and wood products trade deficit via export and import replacement;
- The beneficial environmental impact of this State's timber industry and its part in the avoidance of transferring environmental burdens to other places;
- The industry ability to support regional employment even through drought, socio-economic changes, and other hard times in the rural areas; and
- The importance of the inter-connectedness of all sections of the timber industry (timber growing, sawn timber, wood panels and pulp and paper manufacturing) underpinning a healthy timber sector.

## **PRIORITY 1 - FACILITATE PRODUCTIVE, COMPETITIVE AND SUSTAINABLE TIMBER INDUSTRIES**

1. ***Action 01 - Provide greater certainty of access to public native forest timber resources.***
  - 1.1 A3P supports Action 1.1, especially the promotion and implementation of sustainable forest management principles for both plantation and native forest. The key principle of sustainable forest management is the simultaneous management of forests for multiple uses - integrating commercial and non commercial objectives such as biodiversity management, timber production, recreation, aesthetics, grazing, soil and water catchment protection, carbon sequestration, cultural and scientific values. A3P has encouraged its members to seek independent sustainable forest management certification or chain of custody certification to demonstrate the sustainability of their forest management to governments, the community and the market. The two main sustainable forest management schemes operating in Australia are the Programme for the Endorsement of Forest Certification (PEFC) and the Forest Stewardship Council (FSC). The PEFC includes the Australian Forestry Standard (AFS). Certification is seen by A3P as a vehicle to ensure that sustainable forest management is adopted, practiced, and is the culture of land managers across Australia.
  - 1.2 A3P has no specific comment to make on Action 1.2.
  - 1.3 A3P has no specific comment to make on Action 1.3.

## 1.4, 1.5 & 1.6

A3P supports in principle Actions 1.4, 1.5 & 1.6. A3P members have an interest in the effectiveness, commerciality, and continuity of sustainable native forest management. Any policy or initiative that increases the potential flexibility and certainty (of sales supply term and provisions) to industry in order to underpin industry's competitive return on investments, allowing re-investment in capital and driving innovation, is welcome especially in the current supply and economic environment.

Forestry (especially plantation forestry) is a capital-intensive long-term industry. In conjunction, fibre processing and manufacturing industries (such as sawmills and pulp/paper plants) undertake large financial investments with long payback timeframes which must be underpinned by security of fibre supply. As a result there are important long-term commercial relationships built up over time between fibre suppliers and processing customers, as an alternate supply of fibre may take years to develop if the primary source is destroyed, say by a wildfire event.

Large amounts of current commercial fibre and future fibre stock (including plantation softwood, plantation hardwood, and native hardwood) were destroyed by the 2009 Victorian bushfires. In the short-term a large salvage program is occurring to utilise the burnt fibre, and in the longer-term there will be potentially significant implications on fibre processing industries. Forest growers (including A3P members) have yet to fully quantify these supply implications but the supply chain will need to work together to ameliorate the current and future impacts. Supply certainty and the continued focus on supply implications and mitigation, is very important to the viability of the timber industry.

Over recent years (the past 10-15 in particular) NSW and South Australia have benefited from significant investment in both green-field and brown-field projects in the wood processing sector. This has seen to have been assisted by support from local and State government for plantation development and investment in processing facilities. On the other hand, planning rules have become less certain in Victoria leading to reduced levels of investment in plantation development and wood processing. In most of Victoria's key plantation areas, a lack of sufficient resource to support internationally competitive scale integrated wood processing facilities is seen to be undermining investment.

## **2. *Action 02 - Improve estimation and communication of sustainable yield from public native forests.***

- 2.1. A3P supports in principle initiatives, such as Action 2.1 and 2.2 that provide increased certainty of commercial supply arrangements, and increased rigour in sustainable forest management.

Victorian timber processors, and pulp and paper manufacturing companies will continue to require base agreements for long term supply security to ensure ongoing investment in value-adding manufacturing operations, and innovation in existing operations.

2.2. See A3P comments on Action 2.1 above.

**3. *Action 03 - Improve the sales system for native hardwood logs from public native forests.***

3.1. Apart from noting that if the basis of the Vicforests Price Allocation Model is to be fair and transparent, it will rely on a firm guarantee, through legislation, of the regional sustainable yield, A3P does not have a specific comment to make on Action 3.1.

3.2. A3P appreciates the intent of VTIS Action 3.2, and suggests that the Victorian government will need to take into account there are additional complexities in native forests such as variations in species, timber quality, and timber characteristics when benchmarking timber pricing and timber pricing systems.

**4. *Action 04 - Sustainably develop timber plantations and private native forests.***

4.1. A3P strongly supports the recognition of timber plantations as an “as of right” activity in the Farming and Rural Activity Zones as this action removes a current in-equity. This makes the treatment of plantations consistent with other agricultural crops and is consistent with the Government’s strategy not to “pick winners” in land-use. The requirement for planning permits is currently inequitable, has added unnecessary cost, delays, “red tape” and has been a disincentive to development of new timber resources for the processing industries in Victoria. The forest and plantation industry readily accepts that it is the only broad-scale land use to have a legislated Code of Practice to direct the quality of its operations, and it should not be burdened with further layers of regulation.

A3P has been significantly involved with the Plantations for Australia: The Plantations 2020 Initiative. Plantations 2020 is a strategic partnership between the Australian, State and Territory Governments and the plantation timber growing and processing industry. The overarching principle of the Plantations 2020 is to enhance regional wealth creation and international competitiveness through a sustainable increase in Australia's plantation resource. A3P sees that there is close alignment between the Plantations 2020 and the draft Victorian Timber Industry Strategy, with both strategies having a consistent focus on delivering a sustainable and competitive Australian plantation sector. A3P and the plantation timber industry have a keen interest in future plantation investment and feels that this is an area where VTIS needs to develop further complementary actions.

- 4.2. If the Code of Practice for Timber Production is to be amended to reflect changes outlined in Action 4.2, the industry needs to be assured that this is the only fundamental change to be made. Industry has invested considerable time and resources in consultation prior to the current revised version of the Code being approved and further substantial resources in aligning company procedures and operating standards with the revised Code. It is not considered reasonable to create the uncertainty of a changing regulatory framework. A3P also endorses that forest growers/managers not be obliged to use those with the proposed accreditation, and that staff working for forest companies, environmental and forest professionals, also be entitled to become accredited under the proposed system. In addition refer to the associated A3P comment made under Action 9.2.
- 4.3. A3P notes that national consistency, although a worthy objective, is often difficult to achieve in practice and in an effective manner.
- 4.4. A3P supports the intent behind Action 4.4. The long investment periods inherent in establishing and managing plantations for the production of solid wood products require a higher level of certainty to encourage investment. A strong whole-of-Government, and also inter-government, approach can help minimise sovereign risk. Regulatory uncertainty is a major constraint on the expansion of plantations and particularly long-rotation plantations.

The tax arrangements that now underpin private plantation investment through managed investment schemes (MIS) must be allowed to persist, including the recently legislated provisions that support secondary markets in MIS forestry interests. Already these provisions have seen a dramatic upturn in the proportion of MIS forestry investment being directed to long-rotation sawlog plantations. During the current scrutiny being applied to managed investment schemes, the Victorian Government may be called upon to offer support if needed.

- 4.5. A3P supports Action 4.5, the ability of industry to have access to a potential complementary source of timber (veneer, sawlogs, pulplog and other fibre) is important especially in the current supply environment post the 2009 bushfires. A3P commends the VTIS's promotion of sustainable timber production and forest management in private native forestry. A3P suggests an area for additional development is timber supply volume assessment, in order to more effectively manage the timber resource over time.

## **5. *Action 05 - Assist the timber industry to adapt to climate change.***

- 5.1. A3P provides qualified support for this initiative. The four dot point principles identified to manage any impact of land-use change are supported. A3P also suggests water quality must be considered along with water quantity issues resulting from land-use change. A3P support is qualified due to the lack of detail on how, and with whom, the "agreed outcomes" will arise. One of the key issues that arises from this discussion, is that the National Water Initiative should only be implemented as written, that is constrained to consideration of land use change (for example new plantations) not existing land uses.

- 5.2. A3P members are primarily focused on the plantation sector. However, the public native forest will continue to supply timber resource (veneer, sawlog, pulp, firewood etc) for various parts of the wood processing industry for the foreseeable future and stability of this supply is fundamental to underpin investment in the sector especially in light of recent fire impacts on timber supply in the longer term.

Due consideration should be given to more flexible minimum rotation lengths in defining a State sustainable yield objective. This should reflect the option of use of smaller logs, recognise that more productive sites warrant shorter rotation ages, and that thinning facilitates faster growth of retained trees and thus enables reduced rotation ages. A3P calls on the Victorian Government to ensure that the work being carried out under Action 2.21 of *Our Water Our Future, Securing Our Water Future Together* in relation to future management options for State Forests supplying water to Melbourne does not result in a net loss of resource to industry.

- 5.3. A3P commends the Victorian government for identifying climate change impacts and adaption as a key issue and attempting to address it in the VTIS. A3P supports the concept of responding to climate change through prioritization of research and development outcomes that aid climate change adaptation, specifically for the timber industry.

Further A3P identifies the following points that should be considered when this action is developed further:

- R&D outcomes for climate change adaption in order to be effective need to be regionally based, specific in focus and targeted towards priority areas that will bear the brunt of the climate change impacts (eg. marginal rainfall site quality plantation areas on the edge of large timber supply basins);
- Forestry is a long-term commercial business, yet forest managers need valid effective information in the short-term to inform and apply to their management regimes (ie silviculture, site establishment, seedlings, timber quality, species application etc) so that effective adaption to predicted climate change impacts can be achieved;
- Not enough R&D has been undertaken in this area. The Federal Government has allocated \$8m for R&D in this area. This initiative is a good start but more funds and quality proposals are required;

A3P has been at the forefront of the climate change debate nationally and has been heavily involved in the development of the "Climate Change and Commercial Forestry Action Plan" that was initiated by the Department of Agriculture, Fisheries and Forestry. A3P and its members will continue to work with the Victorian government on the progression of this action.

- 5.4 A3P members include significant land and forest managers (of plantation, native forest and other land). These organisations have a significant current and historical role in fire detection, suppression and management on land directly managed by them and on adjacent land holdings in the various states of Australia. These organisations play a key role (and have had a long successful history) in fire management on a landscape scale (across differing land tenures, land uses, and fuel types) including fire suppression, fire prevention, fire policy input, fire planning and management. This includes investment in fire prevention, detection, and suppression resources, commensurate with the plantation asset value and fire risk. Forest Industry Brigades make a significant contribution to Victoria's fire fighting capability and have an important stake in fire management policy discussions.

Strategic hazard reduction burning is a key prevention strategy utilised by forest managers to reduce fuel load and the risk of large bushfires. Other strategies include grazing, mechanical hazard reduction (mineral earth breaks), community education, and regulation of potential fire ignitions. Strategic hazard reduction burning has been shown, by extensive research, real fire experience and history, and acceptance by land and forest managers, to be the most effective fire prevention and mitigation tool in a land/forest manager's arsenal. Please refer to A3P submission to the 2009 Victorian Bushfire Royal Commission at <http://www.a3p.asn.au/admin/assets/pdf/Submissions%20and%20Reports/2009/A3PBushfireSubmissionMay2009final.pdf>

The 2009 bushfires had serious negative impacts on forest growing and timber processing, and the timber industry will seek to work with Government in support of Action 5.4.

## **PRIORITY 2 - ENSURE THE DEVELOPMENT AND OPERATION OF EFFICIENT TIMBER MARKETS**

6. ***Action 06 - Improve freight infrastructure and logistics to support the timber supply chain.***
- 6.1. A3P strongly supports working in partnership with the Commonwealth Government to develop the road, rail, and port infrastructure required to ensure an internationally competitive and efficient environment in which the timber industry can operate. The timber industry is predominately rural-based, with the plantations and forests that supply the raw wood fibre being geographically dispersed. As a result, the importance of cost effective transportation for raw and finished products is vital to ensure a competitive and vibrant timber industry continues in these rural areas in the future. The ability to service an export market in a cost effective manner is also very important for current and future timber industry viability.

As investment in infrastructure is very expensive, specific targeting of limited investment funds becomes very important. A3P recommends:

- that a strategic process for infrastructure investment and funding priority setting with industry consultation is vital for effective and optimal infrastructure development; and
- targeting of infrastructure investment (road and rail solutions) at smaller, essential local government projects would yield great benefits to efficient timber/finished product transport.

**7. *Action 07 - Facilitate the development and commercialisation of new and emerging markets for timber and timber-related products.***

7.1. A3P endorses Action 7.1 and is actively engaged with the Commonwealth Government on the CPRS development. There are opportunities for plantation industries which sequester carbon however there are risks to Energy Intensive Trade Exposed (EITE) industries, such as timber panel producers, and pulp and paper processors. All sections of the timber industry are interconnected, and any impacts of a CPRS scheme on a group of industries is likely to have impacts on the others. This uncertainty will have a direct impact on investment and innovations in the timber industry.

7.2 A3P strongly supports the intent of Action 7.2, with the Commonwealth and State governments seeking the inclusion of carbon stored in wood products in the international climate change framework. A3P would like to see this raised as a priority action at all levels as the lead time to a resolution appear to be long, and opportunities for investment will be missed. A3P's members are also interested in the opportunities that may be created for reforestation under the CPRS.

Provided the CPRS is well designed, the forest growing sector can provide an important, positive contribution to emissions mitigation and abatement by sequestering carbon in new forests and displacing the use of emissions-intensive products with timber (which is less emissions-intensive to produce and also contains carbon). The proposal in the draft CPRS legislation is only to recognise carbon storage as the forest grows; if a plantation is harvested, the proposed rules assume that 100% of carbon stored during tree growth is released back to the atmosphere. This is clearly not the case. The CPRS should reflect the genuine fate of carbon in harvested plantations by recognising carbon stored in harvested wood products.

A3P supports the inclusion of harvested wood products in the CPRS and believes that the Government should lead the international debate by demonstrating how this can be done. A3P would welcome further opportunities to work constructively with the Government to achieve this outcome.

7.3 A3P supports Action 7.3, as it has the potential to open up new opportunities for all plantation growers and native forest producers. This should enable the pooling of resources to achieve critical mass for bio-energy investments and assist in developing economies of scale for competitive green energy.

- 7.4 A3P supports Action 7.4, in particular research into the potential applied use of wood for bio-energy production. A3P is heavily engaged in the CPRS discussion and has made many public submissions on many components of the CPRS and the enhanced Renewable Energy Target. These public submissions can be found on A3P's website: <http://www.a3p.asn.au>.

A3P would encourage the Victorian Government to ensure that its policies in relation to renewable energy and emissions trading are consistent with the Australian Government's approach. These issues are global in nature and require a clear and nationally consistent approach to avoid irrational and inefficient market distortions or additional administrative burdens for industry (for example multiple, duplicative reporting requirements).

**8. *Action 08 - Support market access and improve biosecurity for sustainable timber production.***

- 8.1. A3P strongly supports and encourages international third party certification schemes for forest management and many of its members are certified against one or both of the major certification standards. A shortfall in the certification concept has been the lack of demand for certified wood in the market place and implementation of Action 8.1 will provide valuable impetus to the recognition of the value of certified wood. Government leadership in recognition that third party certification unambiguously demonstrates sustainable forest management is very positive and can be used to clarify and simplify the certification concept in the minds of consumers.
- 8.2. A3P supports in principle the development of a Forests and Timber Biosecurity Framework. A3P members (especially forest growers/managers) have much to offer (skills, knowledge and applied experience) the consultative process to develop an effective and cost efficient Forests and Timber Biosecurity Framework. A key issue that needs to be discussed during development is the national cost-sharing arrangements for biosecurity incidents.

**9. *Action 09 - Strengthen governance arrangements for forests and timber production.***

- 9.1. A3P supports the general initiative of continual improvement in Government administration, to optimise timely decision making, policy development, and application of regulations.
- 9.2. Administration, application and audit of the Code of Forest Practice for timber production on private land has been inconsistently applied by municipalities in the past and managed in different ways. However there have been some particularly good models for its operation in the shires in the North East of the State where a high level of engagement and co-operation with Shire forestry officers has provided excellent outcomes in monitoring compliance. There has been a more regulatory approach in the Gippsland area with even some sharing of audit data but again with good outcomes in terms of meeting the requirement of shires to effectively monitor compliance.

The number of punitive actions taken due to non-compliance is spectacularly low given the level of scrutiny and the number of forestry operations which occur on private land in the State.

The principle from Action 5.1 of this Strategy should be considered here in Action 9.2 *"The benefits of government action to manage the impacts of...change must outweigh the associated costs"*. It is not clear that there is a significant issue to be resolved here and it is unlikely that the proposed solution would be simple and effective to implement.

The changes proposed in Action 9.2 go some way to addressing some of the general Code compliance issues on private land and a Forest Practices Unit is a good start to concentrate experience, knowledge and resources for the continual improvement of forest operations in the state. However the proposal includes the training and accrediting of staff working in forest companies and this appears to be an unnecessary additional burden of "red tape" and a call on staff resources which is contrary to the objective of reducing "red tape".

Forestry companies employ forestry professionals, and often accept the additional significant costs of being certified against AFS and FSC sustainable forest management standards or both. These standards are strongly recognized in Action 8.1 of the Strategy. This brings with it a range of checks and audit trails to ensure the procedures are in place internally to comply with the law including the Code. An Accredited Forest Practitioner (AFP) training and accreditation program would create a further layer of registration and other continuing administrative procedures and additional costs. The Shire may receive Timber Harvest Plans lodged by the company signed by an AFP, however provided it meets the requirements of the Code it should not matter who lodged the plan. In addition lodgment by an AFP still does not absolve them of the responsibility to ensure the plan is compliant or that there will be compliance on the ground.

If the accreditation is compulsory and the objective is to have disciplinary arrangements where there is non compliance then that involves a further suite of administrative measures. If it is a voluntary arrangement it will not be likely to gain traction.

In April of 2002 the State Government announced funding to Timber Towns Victoria to establish and administer a state-wide system of accreditation for a two year period. The system was developed in January 2003 but did not gain support because it did not provide any fundamental benefit and being a voluntary system complete with disciplinary measures it did not attract volunteers. The shires were still required to ensure compliance and any plan or operation certified by an AFP could not automatically be deemed to comply with the requirements of the Code. The need to leave the code compliance with the Shires who argue they do not have the expertise or resources, while at the same time establishing a Forest Practices Unit with those expertise and resources is not well explained in the VTIS.

A3P considers the Forest Practices Unit is a good initiative and urges that it be staffed with people who have strong operational experience. There have been examples where the lack of expertise argued by the local government has manifested itself in poor decisions by staff who were not sufficiently accountable and which became time consuming for the plantation companies. They provided no environmental benefit and reduced respect and confidence in the Shire's role. This should not be replicated in a Forest Practices Unit.

A3P is concerned that a proposal is being put forward in the VTIS which is not likely to be an effective measure and which detracts from a good strategy document. A3P would be pleased to work with departmental staff to understand the objectives of the proposal and develop an efficient and effective alternative.

- 9.3. Apart from urging continued consultative involvement between the Minister and industry regarding policy development, A3P has no specific comment on the current proposed governance arrangements.

### **PRIORITY 3 - DRIVE INNOVATION IN FORESTRY SCIENCE, TECHNOLOGY AND PRACTICE CHANGE**

#### **10. Action 10 - Encourage industry innovation and research and development (R&D).**

- 10.1 A3P supports in principle Action 10.1, and states our concern that research and development (R&D) activity in the forest and wood products sector in Victoria has declined and become disparate as a result of restructuring, and changes in views, about Government R&D responsibilities.

A3P considers that there is an ongoing role for State Governments in providing a critical mass of R&D expertise in Government departments and/or academic institutions to provide public good services in relation to forest management and the suite of forest and wood products. Areas of particular concern include:

- biosecurity (forest/tree health surveillance, pest control and quarantine);
- bio-energy initiatives; and
- climate change adaptation.

A3P encourages the Government to continue a high level of consultation with industry regarding the development and priorities of the Government's R&D proposals and investments.

- 10.2 A3P supports in principle Action 10.2 and suggests that the current structure of Forests and Wood Products Australia (FWPA) is a useful framework for an effective and cost efficient R&D funding organization.

## **11 Action 11 - Improve industry occupational health and safety**

- 11.1 A3P strongly supports this Action 11.1 for the Victorian government to encourage the development and adoption of best safety practices within the industry. VTIS should seek mechanisms to improve the level of occupational health and safety across the industry. Work-safe Victoria has been active through its Peak Forum for safety in the timber industry, and recently a new set of safety guidelines were developed together with industry. Programs on raising the level of safety performance should concentrate on assisting industry adopt best practice and improved data collection.
- 11.2 A3P supports the promotion of Best Practice OH&S standards and to that end provides direct and active engagement by being represented on the Forest Industry Council.

## **PRIORITY 4 - FOSTER STRONG COMMUNITIES**

### **12 Action 12 - Build a safe and skilled workforce**

- 12.1, 12.2 & 12.3 A3P supports the intent of Action 12.1, 12.2 & 12.3. VTIS should promote the future of the industry by reviewing the training requirements of the industry and developing a strategy to ensure a coordinated program of training provision is in place. The industry and its workforce cross the Victorian borders with both NSW and South Australian and it is critical that efficiencies are gained by coordinating across states. The employment opportunity and the training task created by the rapid increase in harvesting which will soon occur within the blue-gum industry requires strong Government input and co-ordination.

A3P is a member of ForestWorks, as are many A3P member companies. The Australian Government has designated ForestWorks as the Industry Skills Council for the forest and wood products industry. A3P encourages the Victorian Government to support the activities of ForestWorks and thereby enhance training and skills development for the industry in Victoria.

ForestWorks strategic planning over recent times has highlighted the need for improved communication, coordination and integration in skills development and training delivery between companies in the industry, registered training providers and employees or potential employees. Because of the regional location and relatively small size of the industry greater coordination is essential. A3P encourages the Victoria Government to provide funding to assist the coordination of training and skills development in the timber industry.

### **13 Action 13 - Enhance community understanding of the benefits of Victoria's forests**

A3P supports in principle Action 13.1 & 13.3, but is interested to see what funds, potential funding sources that may be targeted, and what individual programs are proposed?

A3P commends efforts to raise the profile and promote understanding of the valuable role that the timber industry and downstream conversion industries have in Victoria and especially rural communities.

A3P has no specific comments to make on Action 13.2 & 13.4.

## **VTIS Implementation**

A3P seeks a whole of government approach in ensuring facilitation of the Victorian Government's policies supporting the timber industry. There appears in some sections of government to be a lack of understanding of the critical value of the plantation products and paper industry to Victoria, and to regional prosperity.

Conflicting legislative and regulatory requirements among various Victorian Government departments and local government, particularly in relation to the establishment of new plantations creates a less than competitive regulatory environment for investment in Victoria, compared with NSW and South Australia.

A3P recommends that for the final VTIS to effectively meet any of its objectives it must be supported with adequate human resources, funding resources, and underpinned by the continued will of the Victorian government. Many of the actions identified in the VTIS will require a regional implementation vehicle and in the current environment with the demise of the regional Private Forestry Development Committees, it is unclear to A3P how these actions will be progressed.

A3P and the plantation timber industry look forward to working constructively with the Department of Primary industries and other relevant agencies in the finalisation and implementation of the VTIS.

***[End of A3P submission]***

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