

21 June 2010

Department of Sustainability and Environment
Attention: Sustainable Water Strategies Branch
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Dear Sir/Madam,

**Re: Australian Plantation Products and Paper Industry Council (A3P)
Submission on the Draft Western Region Sustainable Water Strategy.**

Thank you for the opportunity to make a written submission on the Western Region Sustainable Water Strategy (WRSWS). Please note that this letter of support and the submission by the Victorian Association of Forest Industries forms the basis of A3P written response to the WRSWS.

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. A list of A3P members and statistics on their operations is available from the A3P website: www.a3p.asn.au.

A3P members include significant forestry plantation managers and significant wood product and paper manufacturers (some located in Victoria). Forestry plantations are involved in the water cycle playing a role in water interception and water quality. Wood product and paper manufacturers use water within their processes and are large regional employers.

A3P acknowledges the importance of good management of water resources. As a responsible land user, the forestry plantation industry has a role to play in water management. Many Australian plantation managers have achieved sustainable forest management (SFM) certification to substantiate their management credentials. SFM standards include forest management criteria requiring the protection and good management of water resources for water quality, water flows, and the prevention of water pollution.

A3P supports the submission by the Victorian Association of Forest Industries which addresses the Accounting for all Significant Water Uses in Chapter 6 of the WRSWS.

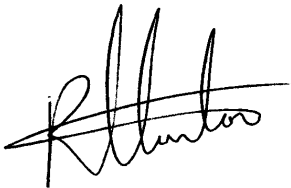
Specific points that DSE should consider and address in the Western SWS, to better reflect the spirit and principles of the National Water Initiative (NWI) and other policy principles, appreciate the role that plantations play in the landscape, and achieve equitable water management outcomes include:

- Unintended outcomes (unsustainable industry activity and reduced plantation investment) due to uncertainty and increased cost of inequitable water policy development and measures;
- Appropriate determination of the 'significance' of an interception activity in the context of the relatively small significance of plantations;
- Policy development should be constrained to the consideration of land use change (for example new plantations) not existing land uses, in line with NWI principles;

- All policy on water interception must be underpinned by sound, repeatable and reliable science;
- All land-uses should be treated equitably and all forms of land-use change considered;
- Incorporation of the principle of no retrospectivity in relation to policy measures;
- The benefits of a policy measure or intervention must outweigh the costs (potential complexity of licensing, establishing water rights and the trading of these rights);
- Benefits of land-use change to the community (social economic and environmental) should be taken into account;
- Replanting a crop (including a plantation) following harvesting does not constitute a change in land use; and
- Policy must be adaptive and flexible, supported by investment in new science and research.

The forestry industry looks forward to working constructively with the DSE. If you have any questions about A3P's submission please contact Gavin Matthew **(02 6273 8111 or gavin.matthew@a3p.asn.au)**.

Yours sincerely



RICHARD STANTON
Chief Executive Officer

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