

Review of the Forest Practices Code - response to comments received during public consultation June 2020

Organisation (if applicable)	Commenter ID	Received	Comment No.	Code Section	Line #	Text of Submission	Response to submission
Angler	1	22/07/2019	1	N/A	none given	Extract: Recent concerns include siltation, all too ready sully or turbidity after rain and excessive algal growth. I have observed clear felling of plantation forests along parts of the (river name withheld) right down to the banks and believe that some of the problems are directly attributable to these practices. It is my belief that silviculture, particularly involving non-native trees, should not extend right to the bank of any river or stream and that the riparian zone and beyond should be protected, in so far as it is possible, by not disturbing native vegetation.	Submitter did not appear to have read draft Code in entirety - only 10 points of Key Change. Emailed to clarify that full text was available, and how to access it, and invited further submission (none received). ADEQUATELY COVERED IN E1.2 - establishing plantations adjacent to watercourses - native reveg encouraged. Also C7.1
Surveyor-General	2	25/07/2019	2	Appendix 5. Requirements for FPP Maps	4186-4227	A clause should be inserted in this section to specify that the datum of the FPP map should be shown in terms of the Datum specified in the version of the Survey Directions Tasmania currently in operation, as issued by the Surveyor General. Explanatory note: the sample plan shows the 'GDA logo'. This is in fact GDA1994, or GDA94 for short. In 2020 Tasmania will be moving to a new datum, GDA2020. The Surveyor General will issue revised Survey Directions in early 2020 to make it mandatory for cadastral surveyors to conduct registered surveys on the GDA2020 datum. Whilst these Directions are only mandatory for Registered Land Surveyors, all entities in Tasmania which use GNSS (GPS) and spatial data will be encouraged to migrate to GDA2020 so that precise positioning and spatial data are more easily made coincident. Spatial Data in LIST for example will be in GDA2020 by 30 June 2020. By referencing the Survey Directions Tasmania , the revised Forest Practices Code will ensure that whatever datum Tasmania is adopting (now and in the future) will be consistently applied in forestry activities.	Add an additional point in the Appendix reflecting the first sentence of the comment. Remove GDA logo from map shown in section A and Appendix 5.
Surveyor-General	2	25/07/2019	3	Appendix 5. Requirements for FPP Maps	4223-4226	Item 10. This should be clarified / augmented to add the following: Where a boundary shown on the map is a property or title boundary, it must only be physically marked or indicated on the ground by a Registered Land Surveyor, and the property or title boundary shown on the map must not be determined by digital software tools from machinery systems or other mapping software. Explanatory note: Only a Registered Land Surveyor is legally entitled to mark property boundaries. Even if the origin of the property boundaries on the map have been prepared by a Registered Land Surveyor (for example, coordinates provided at corners), use of machine control systems or other non-survey grade GNSS (GPS) devices to position the machine in relation to the property boundary shall be avoided, as GNSS (GPS) signals and therefore accuracy degrade significantly in canopied environments. This performance limitation is relevant to all coupe boundaries, but only with property or title boundaries is demarcation prohibited to anyone other than a Registered Land Surveyor.	Sent new words in A3.2 back to Surveyor-General for review, which were then incorporated.
Beekeeping	3	30/07/2019	4	N/A	none given	Extract: Please make amendments to the Forest Practices Code to protect Tasmanian Leatherwood trees for all of our Agricultural industries.	Currently only one reference to leatherwood, in D2.1 Watercourse Management, which identifies dense leatherwood stands as a value which may warrant wider streamside reserves. Not within scope of Code.
TasWater	4	1/08/2019	5	A3.2 Forest Practices Plans (FPPs)	412, 430	Submission: That water quality and flow be included as factors that will be considered when drawing up an FPP	Add the words "water quality and flow" to lines 412 and 430.
TasWater	4	1/08/2019	6	A3.2 Forest Practices Plans (FPPs)	505	Submission: That a definition of Water Management Authority be included in Section G. Submission: That TasWater be identified as the water management authority for town water supply catchments and intakes	FPA would always mean TasWater when referring to the water management Authority. Only problem is name of agency may change over time - need a generic term like "The Forestry Corporation". Suggest "statewide water and sewerage corporation" - words taken from Tas Water website. CHANGED TO "TASWATER"
TasWater	4	1/08/2019	7	A3.2 Forest Practices Plans (FPPs)	505	Submission: That responsibility for, and the process for, consultation with the water management authority be clearly identified in the Code	No change made.
TasWater	4	1/08/2019	8	A3.2 Forest Practices Plans (FPPs)	508	Line 508 is inconsistent with line 2578 which indicates that FPPs will identify town water supply intakes within 5 kilometres downstream of planned forest practices Submission: That line 520 be amended to require that FPPs identify operations within 5 kilometres upstream of a town water intake.	Within 2 km, we have specific restrictions, but FPOs should be aware that there is a possibility of risk within 2-5 km. The two references are not inconsistent.
TasWater	4	1/08/2019	9	A3.2 Forest Practices Plans (FPPs)	520	Line 520 et al provide requirements for what is to be included on FPP maps. The requirements do not include details of the catchment where the planned forest practices will occur, or the location of the planned activities with respect to town water supply intakes (where the activity is within a town water supply catchment) Submission: That FPPs be required to include a catchment plan showing the location of the planned forest practices in the catchment, and where the activities are in a town water supply catchment, the catchment location plan must include the name of the catchment, and the name and location of the town water supply intake	This information is included on Coverpage, where relevant. Catchments are checked and documented in the special values process, but this may not necessarily be documented in the FPP itself. If the town water supply is close enough to a coupe to be on the same map, it will generally show up on the FPP map, but FPP map will generally not show things 5 km away. Add "town water intake, if any" to the list of items at #5 in Appendix 5.
TasWater	4	1/08/2019	10	Table 7 Minimum streamside reserve or machinery exclusion zones widths	2537	Submission: That a minimum streamside reserve or machinery exclusion width of 40 metres be required for all watercourses.	No evidence presented to indicate why this should occur. Not justified based on past experience - no problems with watercourse protection identified in M & A programme.
TasWater	4	1/08/2019	11	Table 7 Minimum streamside reserve or machinery exclusion zones widths	Table 7	Submission: That Table 7 note the requirements of section D2.2 for greater minimum distances for clearfelling adjacent to a watercourse within 2 km upstream of a town water supply intake.	Added another note to this effect in the Notes section.
TasWater	4	1/08/2019	12	D2.2 Water supply and other significant catchments	2571	Submission: That the Forest Practices Authority establish and maintain a register of the areas of town water supply catchments clear-felled in each calendar year.	Not a Code matter. Not within the FPA capacity to do this.
TasWater	4	1/08/2019	13	Appendix 5. Requirements for FPP Maps	4186	Submission: That FPPs be required to include a catchment plan showing the location of the planned forest practices in the catchment, and where the activities are in a town water supply catchment, the catchment location plan must include the name of the catchment, and the name and location of the town water supply intake.	Same comment and response as for comment #9 above - i.e. this is checked and documented in the special values process. No change required. Submission of three-year plans in spatial format may allow analysis of where proposed forest operations are within catchments. This is beyond the scope of the Code.

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FPO(1)	5	8/08/2019	14	N/A	none given	QCofP talks about Sediment Traps , not silt taps, for consistency of terminology we should use the same I think. Sediment trap - A structure or pond to collect sediment.) from QCofP Pg 5. we may need to address this in the FPCode revision as well. Dot point 4 page 22 of the FPC. See lines 734, 873, 881, 945, 947, 1167, 1266, 1966.	"Sediment trap" added to glossary. "silt trap" changed to "sediment trap" throughout text. Diagram corrected.
FPO(1)	5	8/08/2019	15	B5. Quarries and borrow pits	none given	definition of Borrow Pits needs to be clarified.	See comment 20 below
FPO(1)	5	8/08/2019	16	B7. Road maintenance	none given	Concerned about deterioration of major road networks.	See comment 21 below
FPO(2)	9	6/09/2019	17-18	C6.2.1 Construction and use	1999	Re line 1896 about stockpiles, it says at least 10m away from a SSR or MEZ - they actually both sort of exist, so even if you have a plantation coupe and you're operating with a 10m MEZ, technically you still have an SSR that's there as well, even though it makes no difference to what you're doing for harvesting. For example if site prep comes in afterwards and wants to put a firebreak in, for a class 2 they have to put it 30 m away, so it conflicts- its saying if you have a 10 m MEZ you can have your landing 20 m away from the stream, but in reality if you if have a 30m SSR, and you have to keep 10 m away from that, you're actually 40m away from the stream bank, so that wording needs to be changed somehow.	Discussion - can put a stockpile 10 m from a MEZ in an older plantation, even if it is within an underlying SSR. So, the streamside protection mechanism which is applicable during the harvest phase should dictate how far away a stockpile has to be. Changed to: "Stockpiles should be located on well drained sites and at least 10 m further away from the streambank than the required width of any streamside reserve or machinery exclusion zone, as defined in Table 7, and at least 20 m from sinkhole margins."
FPO(2)	9	21/09/2019	19	Appendix 5. Requirements for FPP Maps	4195	Opinion: no need to describe boundaries shown on map; adds unnecessary padding to FPP	Description of boundaries important for legal reasons -able to reference in court -leave as is
FPO(2)	9	21/09/2019	20	C1. Harvesting Systems	1344	"In most situations the number of extraction tracks and landings used for timber extraction should be minimised, to limit the area of potential soil degradation." Need to get to all wood - shouldn't say "minimised"	"...should be planned and arranged efficiently to limit areas of potential soil degradation" Replaced "minimised" with "kept to a minimum"
FPO(2)	9	21/09/2019	21	C2. Fire management planning	1487	Opinion - C2 Fire management section - wrong place, shouldn't be in Harvesting section	leave section where it is. More on fire in Section E.
FPO(2)	9	21/09/2019	22	Table 4 Guide to harvesting systems for a range of soil erodibilities and slopes	1561	Table 4 - High/Steep /dry or moist cell is "C" - should be "B"	Suggested change not made due to risk.
FPO(2)	9	21/09/2019	23	C4. Felling	1663	"Trees outside the harvesting boundary of the FPP will not be felled unless the primary reason is for safety or fire management, and permission has been obtained in writing from the landowner on whose land the trees stand." Does not take into account landowners who may already be FPP signatories - e.g. large estate owned by one forest manager	This statement meets the Forest Practices Regulations 2017 4b/4h - no change made.
FPO(2)	9	21/09/2019	25	C6.1.1 Construction and use	1869	Change word "snigging" to "extraction"	Done
FPO(2)	9	21/09/2019	26	C6.1.2 Management and restoration	1901	"On soils of moderate-to-high erodibility or less..." CONFUSING AND UNCLEAR	New wording: On soils of low, moderate, and moderate-high erodibility
FPO(2)	9	21/09/2019	27	Table 5 Maximum spacing between grips on extraction tracks	1944	Table 5 - Maximum spacing between grips on extraction tracks. Add note saying that if track is outloped, gripping may not be required	Added a note: "If the track is outloped and water cannot flow for a distance greater than the required grip spacing, grips may not be required."
FPO(2)	9	21/09/2019	28	C7.2 Harvesting plantations in streamside reserves	2157	For plantations established after 1 January 2001 - No plantations are to be harvested within 10 m of a class 1,2, or 2 watercourse. Problem: precludes wildling removal.	Addressed in section E4 Stand maintenance
FPO(2)	9	21/09/2019	29	C7.1 Harvesting native forest in streamside reserves	2119 & 2162	2 x Diagrams - change words from "excavator-type feller bunchers only permitted" to "Felling machines only permitted", to mirror wording change in text.	Changed as per comment.
FPO(1)	11	2/09/2019	20	B5. Quarries and borrow pits	1110 & 1113	I believe the re-wording of this section will lead to borrow pits being open and used in plantation nodes for up to 10 years as the proposal under the new code is to have Plantation FPP's active for up to ten years. Refer Line 542. The intent of Borrow Pits has been for the construction of roads, not maintenance of road networks.	CFPO: OK as long as covered by FPP during use.
FPO(1)	11	2/09/2019	21	B7. Road maintenance	1258	There are major road networks throughout the state which are in very poor state with blocked table drains, blocked culverts, washed out and collapsing bridges...change line 1258 to a "will" statement.	Changed to "will", but makes no difference because "regularly" is not defined. "Prior to expiry of the forest practices plan actions will be taken to prevent severe erosion or road failure of roads". Line 1256 moved to General Principles. Once a FPP expires there is no power for the FPA to enforce road maintenance through the Code if the road is not being used for forest practices purposes. The road construction under the FPP must be of sufficient standard that the integrity of the road and drainage structures will be intact after the FPP expires - the Code prescriptions are sufficient for this to occur. Decommissioning of roads has been discussed and is not supported by forest industry. Note that roads in areas transferred to protected areas have not had any active decommissioning works other than minor works to make them impassable.
FPO(1)	11	2/09/2019	22	B7. Road maintenance	1266	Change to "sediment traps" and replace 'should' with 'will'	Changed to sediment traps but kept as should
FPO(1)	11	2/09/2019	23	C1.2 Coupe dispersal	1485	I believe this section of the code requires strengthening as it is clear from plenty of examples around the state that industry only pay lip service to this concern. Line 1485 - Remove the words "where possible" and replace "should" with "will". (Comment in relation to coupe dispersal)	Deleted "where possible" but kept "should" because it is sometimes not possible to practice coupe dispersal - for example severe windthrow of large areas of plantation in a single weather event.
FPO(1)	11	2/09/2019	24	C1	C2	Access for fire management should be included in "Outcome Statements" in both the Roading section of the Code and section C2.	No change
FPO(1)	11	2/09/2019	25	E1.2 Site preparation techniques	3076	Add a new dot point - introduction of weeds	Changed as per comment.
FPO(1)	11	2/09/2019	26	E1.3 Post-harvest fire management	3261	Management of forest fuels has virtually disappeared in the last 10 years. This cost has been dropped from budgets and transferred to wildfire fighting. Replace "may" with "will"	Where harvest residues are to be retained on site, the risks of unplanned fires should be assessed and managed.
FPO(1)	11	2/09/2019	27	E1.3 Post-harvest fire management	3270	Replace "may" with "will"	If the harvest residues are not to be burned, appropriate fire protection measures should be taken to prepare the site for unplanned fires.
FPO(1)	11	2/09/2019	28	E1.7 Fire breaks and access tracks	3458	Remove the words "slash management" from this line.	Runoff will be slowed down and diverted away from fire breaks and access tracks using measures such as outloping, grips, and spoon drains. Where practicable, water should be diverted into vegetation or slash.
FPO(1)	11	2/09/2019	29	E3.2 Diseases	3586	E3.2 Should Chytrid fungus and myrtle rust be included?	Other threats to forest health arise from time to time, e.g. myrtle rust and Chytrid fungus. Where these are associated with forest practices and may impact the environment, specialist advice should be sought and management prescriptions developed if required.
PWS	12	16/09/2019	30	N/A	none given	I am advised that PWS has no comment to make. It appears we are satisfied with the proposed amendments.	not required

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Industry(2)	13	16/09/2019	31	Table 1 A guide to road and access track design	645	Table 1 A Guide to road and access track design - class 3 road - typical traffic volume should be 1500t	Took the entire line out and concentrated on desired outcome in first general principle of B2: • Roads and tracks should will be designed to withstand both the tonnage of wood to be extracted, and the weather conditions anticipated, in order to minimise sediment in runoff and maintain a hard working surface for carting.
Industry(2)	13	16/09/2019	32	Table 1 A guide to road and access track design	645	Table 1 A Guide to road and access track design -class 4 road - typical traffic volume should be 1500t	As above (comment 32)
Industry(2)	13	16/09/2019	33	Table 4 Guide to harvesting systems for a range of soil erodibilities and slopes	1561	Very steep and very high classes - blank cells, no category - assign category D	Changed as per comment.
Industry(2)	13	16/09/2019	34	Table 4 Guide to harvesting systems for a range of soil erodibilities and slopes	1561	Blank category for "generally no harvest" - blank cells, no category - assign category D	Changed as per comment.
Industry(2)	13	16/09/2019	35	C6.1.2 Management and restoration	1902	Table 2 - should read Table 5	Changed as per comment.
Industry(2)	13	16/09/2019	36	C9. Steep country harvesting (slopes 20° and above)	2315	Coupe size on steep slopes: 50 ha - should read 100 ha. The 50 ha rule is historical carry-over from native forest cable harvest days, based on landscape and burning impacts. Plantation coupes up to 100 ha on majority slopes >20 degrees should be permitted.	There is a lot of evidence that argues against an increase in coupe size on steep slopes: severe erosion of stream channels in the Fingal plantations after harvest of large areas (50-250 ha) and landslides in the steepland riparian areas in Oldina plantations. It is not correct that landscape and burning effects in native coupes were the chief driver of the 50 ha rule - the hydrological effects were paramount then and still are. No change made to the to the rule, "unless approved by the CFPO who will take into account potential hydrological impacts."
Industry(2)	13	16/09/2019	37	E1.2 Site preparation techniques	3173	...windrows will be positioned at least 10 m from streamside vegetation - add words "where practical to do so" to allow FPO to determine based on site conditions	The context here is windrows within Class 1, 2 and 3 streamside reserves, and the Operational approach states that these areas "should be managed to encourage the re-establishment of native species". With this in mind windrows designed to be burnt shouldn't be closer than 10 m to existing vegetation - the risk of burning the native vegetation would be too great and this action would not be in keeping with the aim to reestablish native species. However, windrows could be allowed within 10 m (but not within 5 m) provided there is no intention of burning them. Left as is.
Industry(2)	13	16/09/2019	38	E1.2 Site preparation techniques	3177	Control of pine wildlings in SSRS without FPP: add "stem injection" as technique, as reflects current practice	Changed as per comment.
Industry(2)	14	16/09/2019	39	N/A	none given	Concern re pre-Code plantations in SSRS, specifically along the [redacted] River. Extract: "The damage caused by the harvesting operations is contrary to the General Principles of Section C7 of the Draft Code, between lines 2064 and 2074, and more specifically, to the condition's mentioned in lines 2201 and 2206. While the Draft Code appears comprehensive, it doesn't go far enough and fails to specifically recognise the problem of remnant bankside vegetation falling into the river post-harvest. While [redacted] and others may be exempt from the provisions of this Draft Code due to the age of the plantations, I can't see how they can be permitted to allow such damage to be caused. Perhaps the Code should provide options such as requiring removal of all vegetation likely to fall into the river post-harvest, or alternatively requiring post-2001 streamside buffers for these plantations. Certainly, the harvester should be required to remediate the banks, remove the fallen vegetation and prevent further degradation of the river."	Pre- Code plantations were planted to the banks of the [redacted] River in some places and in others native vegetation had grown in the riparian area but had blown over once the protection of the plantation was removed. Salvage harvest (as specified in the Code) was allowed, in order to remove pines near the river and to extract those that had fallen into the river and also to harvest native species that were in danger of falling into the river. There may have been minor bank damage but the overall plan was to ensure a long term good outcome by restoring the riparian zone (at least 10 m) with wind-resistant native species such as blackwoods and this was done. There may have been an appearance of [redacted] being exempt from the Code but this was not the case - all was done with careful planning in consultation with the FPA, after field inspections with the landowner and contractor. No change requires, see also comments 42 and 43.
ENGO (1)	15	17/09/2019	40	Glossary	3943	Long submission re restoration vs. rehabilitation forestry. Line 3943 (Rehabilitation Plantings) should be amended to include burning, direct seeding and weeding as additional techniques beyond planting.	Changed as per comment. See also comment 110.
Industry(3)	16	17/09/2019	41	D2.1 Watercourse management	2571	The provision relates to D2.2 Water supply and other catchment management. The updated provision refers to 'no more than 5% to be clearfelled in any calendar year. For partial or selective harvesting, a pro rata approach based on harvest intensity may be applied. I would like to request that the reference to 'calendar' be removed. This is because forest managers, such as STT and others, develop three year plans and annually report on harvest operations by financial year. Planning and reporting against this provision by calendar year (interpreted as January to December) would be unnecessarily onerous.	Previous Code said "annually". Replaced by "financial year, July to June" This also spans the traditional summer harvest period. Changed to " in any year ending 30 June"
Angler	17	19/09/2019	42	D2.1 Watercourse management	2539	Long submission re pre-Code plantations in SSRS, specifically the [redacted] River. Extract: "The effect of those provisions is clear and they are totally inadequate in terms of complying with the environmental protection requirements of the Act (above): For plantations established after 1 January 2001, streamside reserves are effectively reduced to 10 metres; and for plantations established before 1 January 2001, streamside reserves are reduced to Zero metres! Plantation managers can effectively clearfell a historical plantation right up to the banks of a river or stream and not be accountable for the damage caused to other 'stakeholders', nor can they be required to rehabilitate the damage they have caused to the waterway. This is not 'best practice' forestry in any sense of the term."	See comment 39 and 43. No change required.
ENGO (2)	18	20/09/2019	43	N/A	none given	Extract: "The Forestry Practices Code "prescribes the manner in which the forest practices shall be conducted in accordance with section 31 of the Forest Practices Act 1985." Unfortunately as stated by the Forest Practices Authority "comments relating more broadly to the forest practices system as a whole will not be evaluated during this process". This means that plantations planted prior to the implementation of the Forest Practices Code 1987, that did not require streamside reserves, remain outside the Code and are non-compliant with the current Forestry Code in respect to riparian management and setbacks from streams. This situation occurs on the [redacted] River in the vicinity of [redacted] where [redacted] pine plantations about the river without the benefit of the 40m setback as required for Class 1 rivers in the contemporary codes."	See also comments 39 and 42 . The pines abutting the river were planted prior to the Code. Present plantations are at least 10 m away from the river, as required by the Code when it is the intention that they should be harvested. No change required
ENGO(3)	19	20/09/2019	44	N/A	N/A	Objection to the amendment of the Code under section 32 of the Act. Indicated would provide a follow-up submission.	Advise FPA at December meeting that nothing further to the objection was received
ENGO(4)	20	20/09/2019	45	D4. Biodiversity	N/A	Discourse about the failure of the Code review process to address biodiversity conservation	No specific changes requested by commenter. Biodiversity conservation is dealt with in the Code through the requirement to use associated planning tools.

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PFT	21	20/09/2019	46	Preamble	110	delete ', ' and 'any' as it is incorrect that 'any clearance and conversion of threatened native vegetation communities, must be undertaken under the authority of a certified forest practices plan' (eg the prescribed circumstances described in Reg 4b),c), d) etc of the <i>Forest Practices Regulations 2017</i> do not require an FPP).	Changed as per comment.
PFT	21	20/09/2019	47	Preamble	110-111	suggest adding the term 'clearing and conversion, of threatened native vegetation communities' to the glossary, referencing the definition provided under section 3A of the <i>Forest Practices Act 1985</i> . (It is quite a long definition).	Clause deleted to address comment 46
PFT	21	20/09/2019	48	A1.1 Context	149-150	suggest amending to: '...than through specific restrictions on individual harvesting operations), or in the determination of appropriate sustainable yields for either public or private forests, or the economics or commerciality of forest operations.	Changed as per comment.
PFT	21	20/09/2019	49	A1.1 Context	208-210	The sentence in the proposed code is probably not strictly correct, given that the PNFE applies to native forest <i>per se</i> . For clarity the point that probably needs to be made here is that the prescribed circumstances do not in themselves provide permission to impact on threatened species, threatened communities or other special values as these are regulated under other legislative processes or elsewhere in the Code	Incorporated into previous dot point, i.e.: "This policy [PNFE] prohibits broad scale clearing and conversion of native forest except in prescribed circumstances. These prescribed circumstances do not in themselves provide permission to impact on threatened species, threatened communities or other special values as these are regulated under other legislative processes or elsewhere in this Code."
PFT	21	20/09/2019	50	A1.2 How the system works	250	Suggest rewording to: 'The statutory objective of the FPA is set out in Schedule 7 of the Act, and, as stated in section 4B of the Act, the Authority (the FPA) is to act in all matters in a manner that:'	Recommend adopting suggestion.Changed as per comment. This also addresses comment 113.
PFT	21	20/09/2019	51	A2. The Forest Practices Code	316	Suggest deleting the word 'public' as it is unnecessary and may lead to incorrect assumptions about other tenures in the sentence.	Changed to: "...permanent timber production zone land..."
PFT	21	20/09/2019	52	A3.2 Forest Practices Plans (FPPs)	509-510	Suggest adding the following to the beginning – 'For private land that is not covered by a private timber reserve, in some local government areas, a Development Application may be required for some forms of harvesting but not others.'	Changed as per comment.
PFT	21	20/09/2019	53	C1.2 Coupe dispersa	1475	Not sure what this means - 'adjoining' means 'joined to', whereas 'within a 100m' means there could be a break of up to 100m. For clarity say one or the other or alternatively say 'adjoining or within 100m'.	Previous Code said "...any adjoining coupe" without (within 100 m) in brackets. Recommend "...adjacent areas of native forest are not harvested until the dominant height of any silvicultural regeneration within 100 m is at least 5 m - Added at line 1470: "... to moderate peak stream flows and maintain landscape diversity"
PFT	21	20/09/2019	54	C7. Harvesting of trees adjacent to watercourses	2069	Recommend changing 'possible' to 'practicable'. This would be in keeping with the statutory objective around 'practical standards'.	Changed to "where practicable."
PFT	21	20/09/2019	55	C7. Harvesting of trees adjacent to watercourses	2070-2072	PFT has queried this statement in previous submissions and still believes that the revised version is impractical. Firstly it seems inconsistent with the concept of Guiding Principles to have a 'will' statement here. Secondly, how would it be practical to 'demonstrate' in the here and now that there will be 'no adverse long term impacts'? A possible rewording might be: 'Subject to other provisions of the Code permitting otherwise, harvesting of trees that have been planted in streamside reserves would normally only be permitted where a risk assessment has been undertaken showing that the risks of adverse long-term impacts on riparian values are low.'	Reworded and moved to C.7.3.
PFT	21	20/09/2019	56	C7.2 Harvesting plantations in streamside reserves	2157	Suggest adding at the beginning of this sentence: Subject to other provisions of the Code permitting water course crossings and selective harvesting under certain conditions, ...'	"except when constructing roads through streamside reserves (see B1)".
PFT	21	20/09/2019	57	C7.2 Harvesting plantations in streamside reserves	2206	Recommend changing 'possible' to 'practicable'. This would be in keeping with the statutory objective around 'practical standards'.	Changed as per comment. Relates to use of machinery for removal of debris dams.
PFT	21	20/09/2019	58	C8. Salvage operations	2264-2266	Not sure how the Code can prescribe requirements under other legislation without the statement being <i>ultra vires</i> . A legally safer set of words might be: 'The salvage of timber from new dam sites must not be authorised by an FPP. Such activity is regulated via a dam construction permit issued by DPIPW under the <i>Water Management Act 1999</i> . and must not be authorised by an FPP.	Changed as suggested.
PFT	21	20/09/2019	59	C8. Salvage operations	2270	Recommend inserting 'on or' ahead of 'before 1 January 2001'. Otherwise anything planted on 1 January (albeit unlikely) will be in limbo land not explicitly covered by the Code.	Comment not correct - left as is.
PFT	21	20/09/2019	60	C8. Salvage operations	2274	For clarity it might be useful to add to the end of the sentence 'other than for rehabilitation plantings. Alternatively explicitly exclude 'rehabilitation plantings' from the definition of 'plantation' in the Glossary – eg add to the end of the plantation definition: 'For the purposes of the Code, plantation does not include Rehabilitation Plantings'.	No change made.
PFT	21	20/09/2019	61	D. MANAGING NATURAL AND CULTURAL VALUES	2363-2365	Given this is a 'will' statement, suggest adding it to the Operational Approach, rather than having it in the guiding principles?	Changed as per comment.
PFT	21	20/09/2019	62	D. MANAGING NATURAL AND CULTURAL VALUES	2370-2373	For clarity PFT recommends the following amendments to this section: Small planted woodlots are may be able to be harvested based on a simplified risk assessment process, rather than full implementation of the prescriptions contained within the Code, prior to the preparation of the FPP. For the purposes of this section small planted woodlots may include plantations ...'	Changed as per comment.
PFT	21	20/09/2019	63	D. MANAGING NATURAL AND CULTURAL VALUES	2382	Add 'practical' to the end of this line after 'into a'	Recommend adopting suggestion.
PFT	21	20/09/2019	64	D. MANAGING NATURAL AND CULTURAL VALUES	2384	Add to the end of the sentence: 'and can be conducted in a practical manner'.	No change made, redundant due to comment 63.
PFT	21	20/09/2019	65	D. MANAGING NATURAL AND CULTURAL VALUES	2397-2398	PFT recommends deleting 'additional' from both these lines, as the concept of additionality is more appropriately and adequately covered in line 2399. This amendment would enable special values to be reserved within areas protected for soil and water values (where relevant), rather than appearing to mandate that such values must be reserved in 'additional areas'.	Reverted to wording from 2015, but included a new dot point re FPA prerogative to refuse an FPP.
PFT	21	20/09/2019	66	D1. Soils	2420 & 2422	Query the use of 'will' statements in Guiding [sic] principles.	Commenter means "General principles". Steering Committee opinion requested on this larger question. Chair advised he had reviewed and no change required.

Organisation (if applicable)	Commenter ID	Received	Comment No.	Code Section	Line #	Text of Submission	Response to submission
PFT	21	20/09/2019	67	D4.2. Fauna	2737	Suggest clarifying that this prescription is intended for larger/industrial scale production forest estates. Landscape scale could mean across the landscape including multiple small forest holdings. Suggested amendment: 'For industrial scale production forest on public or private land, at the landscape scale, wildlife habitat strips.....'	Placed in body of text: At the landscape scale appropriate to the management context of an operation, wildlife habitat strips should be retained within or adjacent to operational areas to maintain habitat diversity. Placed definition of Landscape Scale in glossary from Biodiversity Landscape Planning Guideline as follows - Landscape scale: A term used in this report to describe a multi-spatial approach to strategic planning. Four spatial scales of planning should be considered (Biodiversity Review Panel 2008): 1. State-wide 2. Bioregional (IBRA) 3. Planning Context Unit (PCU) - a notional contextual area around the planning node which depends on the scale of operations—e.g. forest block, multiple private property boundaries, CFEV major drainage catchments. 4. Coupe Context Unit (CCU) which on state forest may be a notional 400 ha unit around the coupe, or may be a private property boundary and surrounding land-use context.
PFT	21	20/09/2019	68	D4.3 Listed threatened species and communities	2817	For consistency and clarity recommend adding 'listed' ahead of 'threatened flora and fauna species'.	Changed as per comment.
PFT	21	20/09/2019	69	D4.3 Listed threatened species and communities	2822-2823	For consistency and clarity recommend adding 'listed' ahead of 'threatened species and' and deleting it from the next line.	Changed as per comment.
PFT	21	20/09/2019	70	D4.3 Listed threatened species and communities	2841	Suggest clarifying 'general approach' as meaning 'general principles and operational approach'.	Changed as per comment.
PFT	21	20/09/2019	71	D5. Visual Landscape	2848	Query the use of 'will' statements in Guiding [sic] principles.	reviewed and no change required.
PFT	21	20/09/2019	72	D5. Visual Landscape	2850	Query the use of 'will' statements in Guiding principles.	reviewed and no change required.
PFT	21	20/09/2019	73	D5. Visual Landscape	2951	Query the use of 'will' statements in Guiding principles.	reviewed and no change required.
PFT	21	20/09/2019	74	D5. Visual Landscape	2960	Query the use of 'will' statements in Guiding principles.	reviewed and no change required.
PFT	21	20/09/2019	75	E4 Stand maintenance	3636	PFT supports the concept of low impact stand maintenance operations not requiring an FPP. However PFT is concerned that this section in the amended code is confusing, trying to have it both ways and possibly lacking in legal veracity (given that the regs contain a list of prescribed circumstances where an FPP is not required, whereas, with respect to stand maintenance the Code can only prescribe the manner in which maintenance is undertaken). For the above reasons PFT recommends: 1) That 'low impact stand maintenance operations' be added to the list of prescribed circumstances under Regulation 4 in the Forest Practices Regulations 2017. 2) Lines 3650-3651 be deleted. This is unnecessary if a stand maintenance operation meets the definition of 'low-impact' and sets up a confusing legal scenario of the Code applying a 'will' statement to an operation not requiring an FPP.	Consistent with section 31(4) of the Act - no change required. Recommendation to include in Regulations for clarity noted.
Tasmanian Beekeepers Assoc.	22	20/09/2019	76			request extension of time to comment until 14 October	time extended and submission received. See comment 154 below.
Industry(1)	23	20/09/2019	77	9 A1.1 Context	140-142	Implies that sustainable forest management in Tasmania is dealt with under the Act. This is incorrect. The Act only applies to the relatively small and decreasing area that is managed for forestry purposes.	The commenter is mistaken here - no change required.
Industry(1)	23	20/09/2019	78	9 A1.1 Context	154	Correct. The Act 'contributes' to sustainable forest management.	No changes required
Industry(1)	23	20/09/2019	79	A2. The Forest Practices Code	328	Is this correct? My understanding is that the Code only comes into effect under a forest practices plan.	Current wording is as follows: • The Code applies in all situations where a forest practices plan (FPP) is required (see A3.2), whether or not one has been prepared and certified. • Where a certified FPP is required but forest practices are being conducted without one, the responsible person can still be requested to comply with the Code and to repair any damage under the Act (section 41). • Where a certified FPP is not required, e.g. under the prescribed circumstances described in the Regulations, persons carrying out forest practices are encouraged to apply the provisions of this Code where practicable,
Industry(1)	23	20/09/2019	80	A3.2 Forest Practices Plans (FPPs)	478-481	Delete. Alternatively given a 'should' statement is effectively a 'will', why not also include reference to all 'should' statements?	This relates to the inclusion of the mandatory statement regarding the applicability of the Code to all plans. No change made.
Industry(1)	23	20/09/2019	81	A3.2 Forest Practices Plans (FPPs)	500 & 514	500 and 514 are contradictory in relation to local government. One states prior to certification the other prior to operations commencing, two very different things. The zoning is checked so this is not consultation, but consultation does occur with new road access. Needs rewording. Prior to certification local government planning scheme zoning will be checked on private land not covered by a PTR. New dot: "Prior to certification, consultation will occur with local government if construction of new access or major upgrade of existing access onto local government roads is required."	Not inherently conflicting. No change made.
Industry(1)	23	20/09/2019	83	B1. Planning and locating new roads	553	553 should say "and locations containing significant natural and cultural values..."	Added words "locations containing"
Industry(1)	23	20/09/2019	84	B1. Planning and locating new roads	583	Difficult to avoid springs as road batters will always have water emerging from them - suggest change to Roads will be located to avoid caves, sinkholes, karst stream sinks and springs.	Re-ordered the items in the list, did not use the word karst.
Industry(1)	23	20/09/2019	85	B2. Road design	660	need consistent terminology suggest change from slip zone to landslide as landslide is used throughout code	Changed to landslide throughout text
Industry(1)	23	20/09/2019	88	B3.3 Crossings of watercourses	903	the logs are too big on the truck.	Culvert pipes not logs.
Industry(1)	23	20/09/2019	89	C2. Fire management planning	1515	too much detail – should consider putting most in planning tools	FPA does not have a planning tool relating to fire. Fire is regulated under other legislation and would be confusing if the Code prescribed fire management that could be in conflict with other legislated requirements.
Industry(1)	23	20/09/2019	90	C2. Fire management planning	1532	There are two different issues here, protection of SSRs and the requirement to burn some. Suggest a full stop after practical in line 1533. Then add Burning of Class 4 watercourses may be required as an essential part of hazard reduction or rehabilitation forestry.	Reworded into 2 dot points.

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Industry(1)	23	20/09/2019	91	C6.1.1 Construction and use	1786	Why CFPO approval? The email would be 'Can a skidder cross the class 1? The crossing is culverted, will ensure operations carried out under dry/moist conditions and the approaches are matted. The contractors are aware of the conditions of use and stated in FPP. No other alternative crossing.' The answer will also be yes, so why ask? Delete from 1786-89 and simply add the word skidder to line 1781.	Left as is.
Industry(1)	23	20/09/2019	92	C6.2.1 Construction and use	1999	needs to be clearer	See comments 17 and 18 above.
Industry(1)	23	20/09/2019	93	C7.2 Harvesting plantations in streamside reserves	2157	This should be a risk based approach that enables plantation to be established and harvested with 10m of class 1, 2, and 3 streams. There are instances where a combination of soil erodibility and slope, coupled with previous agricultural land-use results in minimal risk or a better environmental outcome and there is an opportunity to achieve more plantation ground. Might need to think about what a 10m SSR will look like in 25 years when the surrounding plantation trees are cut and the wind throw issues that will result. Might be better if it is all plantation or alternatively wider buffers (that have been thinned to achieve some degree of wind firmness and longevity).	Left as is.
Industry(1)	23	20/09/2019	94	C8. Salvage operations	2274	Grow productive plantation again in the pinch point. With the exception of extended streamside reserves, where the buffers are much wider and actively managed, there is not a single pinch point in the state not growing wilding plantation. They look good on a map as reforested back to native vegetation but unlikely to be achieved in the field.	See comment 60 above. Left as is.
Industry(1)	23	20/09/2019	95	D. MANAGING NATURAL AND CULTURAL VALUES	2359	add "where relevant" to end of the sentence	Suggestion not adopted. Sentence just says " Natural and cultural values in adjacent reserves should be considered...". If no reserves adjacent, obviously not relevant.
Industry(1)	23	20/09/2019	96	D. MANAGING NATURAL AND CULTURAL VALUES	2384	add "foresters" to end of the sentence.	Changed to "by all readers"
Industry(1)	23	20/09/2019	97	D1. Soils	2454	distance threshold? 2km? What do you do with plantations on karst that are within a water catchment, which may include sites 10+km from an intake. With a constraint on clearfelling it would be unlikely that karst areas that are currently deforested (cows and pasture) would ever be reforested (trees). Do the soil and water impact analysis on cows and pasture v trees. Put a distance threshold or better delete it.	Change made as suggested. Clearfelling will not be permitted on areas with vulnerable karst soils, and within 2 km of a water supply intake, unless authorised by the CFPO.
Industry(1)	23	20/09/2019	98	D2.1 Watercourse management	2560	what does 'Type of planting' mean? Referenced in the drawing.	Drawing has already been altered to remove this.
Industry(1)	23	20/09/2019	99	D2.2 Water supply and other significant catchments	2578	why reference 5km? Previously used 2km? Change to 2 km	Relates to TasWater comment # 8 above, which was discussed with Senior Manager S & W and no changes made.
Industry(1)	23	20/09/2019	100	D2.2 Water supply and other significant catchments	2599	Delete 2599-60.	Relates to TasWater comment # 8 above, which was discussed with Senior Manager S & W and no changes made.
Industry(1)	23	20/09/2019	101	D2.2 Water supply and other significant catchments	2563-2626	as a general comment this is double the number of prescriptions compared to the existing Code. What happened between 2015 and 2019 regarding the management of town water? Was there research to say the existing measures, in the 2015 Code, were insufficient?	The reason it looks like there are a lot more prescriptions is that they have been gathered here from other places in the 2015 Code.
Industry(1)	23	20/09/2019	102	D2.2 Water supply and other significant catchments	2584	add road construction and delete from line 2589	Change made as suggested.
Industry(1)	23	20/09/2019	103	D4. Biodiversity	2671-72	Seems a pretty narrow view on biodiversity and does not enable recruitment into the future, which would be important for conservation (longevity). Remember one of the objectives under the General principles "all streamside reserves should be managed to provide long term conservation and or rehabilitation of riparian values".	Current wording deemed acceptable.
Industry(1)	23	20/09/2019	104	D4. Biodiversity	2678	add where relevant to end of the sentence.	Change made as suggested.
Industry(1)	23	20/09/2019	105	E1.2 Site preparation techniques	3168	patches of <u>pre plantation establishment</u> will be retained (insert pre plantation vegetation) just so it is clear that a 10 cm native seedling has to be protected.	No change required.
Industry(1)	23	20/09/2019	106	E1.2 Site preparation techniques	3174-75	See comment re line 2157. Suggest delete	No change required.
Industry(1)	23	20/09/2019	107	E1.3 Post-harvest fire management	3260	delete second sentence (Where harvest resides....) as it is covered in 3288	Change made as suggested.
Industry(1)	23	20/09/2019	108	E1.3 Post-harvest fire management	3303	delete mild conditions (this is not necessary and is open to interpretation).	Change made as suggested.
Industry(1)	23	20/09/2019	109	E2. Use of chemicals	3534	Boundaries must be clear on the map and on the ground and remember spraying technology has accurate precision via the technology used in helicopters etc. Suggested wordingshould be clearly visible on the map or marked on the ground or delineated during operations by proven electronic means.	Reworded.
Industry(1)	23	20/09/2019	110	G. GLOSSARY	3943	Definition ought to cover more than planting. Could include burning, sowing, weed control, assisted natural regeneration, fuel reduction burning (method of weed control). These techniques are more effective and cheaper, and are the techniques which are used. Planting rarely used. Reference to rehabilitation in Code should be widened beyond riparian.	Definition in Glossary widened. No further mention in body of Code.
Industry(1)	23	20/09/2019	111	Glossary	Glossary	Include a definition for coarse woody debris in the glossary	Used "dead trees and the remains of large branches, in various stages of decomposition." Did not state whether standing or fallen.
EDO	24	20/09/2019	General	General	General	In summary we support: the clarification of the scope of the Code to ensure that it applies irrespective of whether or not a Forest Practices Plan (FPP) has been certified; the inclusion of a mandatory statement in all FPPs that references the Code and thus clearly links the Code to an enforceable instrument; the requirement that a standardised map be included in all FPPs.	No changes required
EDO	24	20/09/2019	113	General	General	Extract: We object to the removal of the reference to Schedule 7 of the Forest Practices Act 1985 (FP Act) and to the general environmental duty under the EMPC Act.	This is addressed in comment 50 above. Included reference to Schedule 7- done in section A1.1.
EDO	24	20/09/2019	114	General	General	Extract: We submitted in relation to the 2015 Code that it should not include the duty of care provisions, as these provisions limit the discretion available to the FPA in particular in relation to threatened species and communities. We adopt that submission and say this should be removed from the Code. If the duty of care provision is to remain in the Code, it must be amended. We expressly object to the removal of references in the Duty of Care provision to "All measures that are required under relevant legislation (Table i)".	Chair met with EDO - Duty of Care reverted to original language and placed between General Principles Section D and Operational Approach Section D.
EDO	24	20/09/2019	115	General	General	Extract: In summary, the provisions relating to biodiversity management are lacking. The amendments represent a missed opportunity to identify prescriptions and management actions to better protect biodiversity.	Beyond scope of Code

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EDO	24	20/09/2019	116	General	General	Extract: The planning tools that are to be incorporated should be clarified. What is meant is not sufficiently certain so as to be enforceable. If there are evaluation sheets, they should be clearly identified in the Code by name. These evaluation sheets should also then be identified clearly and available on the website.	Relates to comments 129, 150 and 152 below. Commenter seems to have not identified many planning tools on FPA website. For example, Flow Diagram for Biodiversity Planning may address concerns. Planning tools and documents are administrative tools released at the discretion of the FPA. Clarification made in Glossary
EDO	24	20/09/2019	117	General	General	Extract: We support the use of mandatory provisions, however we recommend that "will" be changed to "must" for clarity and to ensure these provisions are enforceable. An accompanying list of suggested changes is included.	Recommended maintaining "should" and "will" language of FPO culture. EDO list referred to CFPO, expert staff and working groups FPA for decisions.
EDO	24	20/09/2019	118	General	General	Extract: We note that there are a large amount of "should" statements in the Code. The above represents only a small portion and is necessarily incomplete. It should not be taken as a statement of what we say should be changed, only an example. Further, there are other examples of "should" provisions that appear should be mandatory requirements, which relate to road design, drainage, run off, stability, fire, flood and other operational issues. We have confined the above to impacts on natural or cultural values. We recommend that a review of the should statements be undertaken with a view to ensuring that they are applied so as to be enforceable.	Intent is that should statements allow for professional discretion for circumstances encountered in the field. Decision to certify can be challenged by an affected party by reference to the Tribunal or judicial review. EDO list referred to CFPO and Snr. Managers for decisions.
EDO	24	20/09/2019	119	C1. Harvesting Systems	1343	the operational approach is outlined. It does not specify that there must be clear boundaries delineated to protect natural and cultural values, or dispersal of harvesting across time and space. We recommend that after 1343 there be another dot point "harvesting boundaries" which requires boundaries to be identified where required to protect natural and cultural values.	Change made as suggested.
EDO	24	20/09/2019	120	C1. Harvesting Systems	1339	"Felling Prescriptions" – sequencing – we recommend that this identify how harvesting will be dispersed across time and space to minimise impacts to natural and cultural values.	Added "coupe dispersal" as a point in the list of Management objectives at 1320. Otherwise, probably already adequately covered in C1.2 Coupe dispersal
TFGA	25	20/09/2019	121	A3.2 Forest Practices Plans (FPPs)	393	Under the Forest Practices Code (FPP) section there needs to be information relating to the cost of undertaking an FPP. As the Code states, it must consider social, economic and environmental factors. FPP costs are an economic factor that landowners must consider. The cost that private landowners incur to put an FPP application up for review is a significant cost. The cost is incurred regardless of the decision of the FPP. Private landowners have a hard time budgeting for the FPP when the plan can be denied but the cost is still charged to the individual. The TFGA recommends either reducing the plans overall application cost or maintaining the application cost only once an FPP application has been approved as these options would be fairer for the landowner.	Outside scope of Code review
TFGA	25	20/09/2019	122	A3.2 Forest Practices Plans (FPPs)	537	Lifetimes of FPPs: having an expiry period on certified FPPs can be limiting to landowners during industry downturns. If a market is declining the landowner should have the option to place the FPP into a recess, whereby they can hold the certified FPP until the market picks up. There are other situations whereby a similar system should be considered for placing an FPP into recess, an example being the death of landowner.	Outside scope of Code review
TFGA	25	20/09/2019	123	C1. Harvesting Systems	1299	Any variation of an FPP during a three-year plan by the FPA shouldn't add any cost to the landowner. Additionally, any economic impact on the landowner should be considered in FPA's decision.	Confusion between 3-year planning and variations to individual FPPs. Variations to FPPs only incur additional costs as prescribed in the Regulations.
TFGA	25	20/09/2019	124	D4. Biodiversity	2693	TFGA agree that TASVEG only provides an indicative distribution of vegetation communities and ground truthing needs to be undertaken. TASVEG states its use is to determine the probable location of vegetation communities. Tasks requiring more current or precise vegetation boundaries should seek alternate data sources or undertake field verification.	Draft Code acknowledge that TASVEG provides an "indicative distribution of vegetation communities" and states "Validation...will be carried out ...by on-ground survey..". No change required.
TFGA	25	20/09/2019	125	D4.3 Listed threatened species and communities	2817	As a tool the TFGA are concerned that the Commonwealth Government are using TASVEG as a basis to list, under the EPBC Act, endangered species or communities without undertaking any ground truthing.	Outside scope of Code review
FPO(3)	26	20/09/2019	126	A3.2 Forest Practices Plans (FPPs)	442	reference Risk Assessment Form	Change made as suggested.
FPO(3)	26	20/09/2019	127	A3.2 Forest Practices Plans (FPPs)	530	"compliance assessments" -> "compliance reporting" (as per Coverage manual)	Change made as suggested.
FPO(3)	26	20/09/2019	128	D. MANAGING NATURAL AND CULTURAL VALUES	2349	reference Risk Assessment Form	No - these risk assessments refer to the natural and cultural evaluation process. Recommend words at 2350 "The FPA's evaluation sheets for natural and cultural values, available on the FPA website, will be used in the risk assessments which underpin the FPP preparation process described in this section of the Code" Replaced "risk assessments" with "evaluations" (also made change on line 2370)
FPO(3)	26	20/09/2019	129	D. MANAGING NATURAL AND CULTURAL VALUES	2350	reference Evaluation Sheets/Forms, include the generic form title in section H.	Problem is there is no generic title for all the forms across all the FPA sections. This relates to EDO comment 116 above. Clarification made in Glossary
FPO(3)	26	20/09/2019	130	D. MANAGING NATURAL AND CULTURAL VALUES	2370	not called a "risk assessment", retitle as "Checklist" (or better, rename the checklist as an 'Evaluation Sheet/Form' consistent with other FPP preparation process documents and restructure the document to that format).	Calling it a risk assessment is consistent with line 2349 which refers to site-specific risk assessments, which are in fact the N & C evaluation process. Relates to comment 62 above, where it was recommended to leave wording as is. See suggestion for comment 128 above.
FPO(3)	26	20/09/2019	131	D3. Geomorphology	2650	"for assessment of" -> "to advise on the" (clarifies specialist is for advice not recce work).	"for advice on the significance and management requirements"
FPO(3)	26	20/09/2019	132	D5. Visual Landscape	2859	Tech Note 02-04 needs significant updating to comply with current Evaluation Sheets and practices. Suggest review alongside the more modern "FPA process for visual landscape special values assessment and planning" and reference a standardised title (eg. Visual Management Technical Note)	Different documents referenced now
FPO(3)	26	20/09/2019	133	D5. Visual Landscape	2865-9	The safety risk of trees retained for visual management objectives will be considered in the planning and conducting of forest practices. Trees that are intended to be retained for landscape or other forest practices reasons may cause an increased risk to public safety. Consult the FPA Risk Assessment form (on the FPA website), complete it if required, and incorporate any required prescriptions into the FPP. -> Trees intended for retention to meet visual management objectives may increase risks to public safety. Any trees planned for retention will be assessed during planning and operations using FPA's Risk Assessment Form .	Change made as suggested.

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FPO(3)	26	20/09/2019	134	D5. Visual Landscape	2868	<i>Risk Assessment Form</i> also needs inclusion in section H.	Change made as suggested.
FPO(3)	26	20/09/2019	135	D6. Cultural Heritage	2957	"should" vs "will"? What do Procedures say - can we define this as "will... by trained practitioners" to capture the intent of FPA-endorsed Aboriginal heritage FPOs?	This was the intent of the statement. Changed "should" to "will" Replaced 2956 to 2958 with "On-ground surveys for Aboriginal heritage will be conducted by a person who has received specialised training. "
FPO(3)	26	20/09/2019	136	E1.2 Site preparation techniques	3121	"If damage is likely to occur...": should this prescription apply regardless of any estimate of damage occurring?	Already corrected
FPO(3)	26	20/09/2019	137	E1.2 Site preparation techniques	3180	"in the zone from 10-20 m from any watercourse" -> "in the furthest 10 m or reserve from the watercourse" ? does this capture the intent better?	Left wording as is.
FPO(3)	26	20/09/2019	138	E1.2 Site preparation techniques	3192-3297	could the structure of these dot points repeat the wording of 3168-3181 where possible to improve consistency?	One change made in order of dot points.
FPO(3)	26	20/09/2019	139	E1.2 Site preparation techniques	3193	"excavators reaching to points 5 m from" -> "excavators reaching to at least 5 m from the watercourse" clarifies can reach to a 5.5m or 6m point	Intent - to points no closer than 5m. Checked throughout to make language consistent.
FPO(3)	26	20/09/2019	140	E1.3 Post-harvest fire management	3297	"Assessment of whether a post harvesting burn is required depends" -> "The decision to require a post-harvesting burn depends" (not an assessment, a decision point)	Change made as suggested, added " regeneration factors"
FPO(3)	26	20/09/2019	141	E1.6 Protection from grazing and browsing	3425	"significant damage by grazing and browsing " -> "significant grazing and browsing damage"	Change made as suggested.
FPO(3)	26	20/09/2019	142	E1.7 Fire breaks and access tracks	3457	"Runoff should be slowed down and"	Word "down" removed
FPO(3)	26	20/09/2019	143	E1.7 Fire breaks and access tracks	3491	"Grip spacing will be done according" -> "Grips will be spaced according"	Grip spacing will be done in accordance with Table 5
FPO(3)	26	20/09/2019	144	E2. Use of chemicals	3502	"that appropriate legislation" -> "that relevant legislation"	Change made as suggested.
FPO(3)	26	20/09/2019	145	5 E4 Stand maintenance	3636	do we actually have the ability to exclude these low-impact operations from requiring an FPP? I thought we could if they had a VMA as an alternative - but this isn't what the Code is saying here. Check - worth being careful we don't set up ambiguous exemptions to requiring an FPP.	This relates to comment #5 above - retained text. See Code section 31.
FPO(3)	26	20/09/2019	146	F. MANAGEMENT OF FUEL, OILS, RUBBISH AND 3653 EMISSIONS	3665	"be maintained well to" -> "Be maintained to"	"maintained in such a manner as to"
FPO(3)	26	20/09/2019	147	F1. Use of fuel, grease and oils	3668	"necessary cleanup procedures done promptly" -> "necessary cleanup done promptly"	deleted "procedures"
FPO(3)	26	20/09/2019	148	G. GLOSSARY	3717	<i>Agreed Procedures</i> also needs inclusion in section H.	these have now been removed from Glossary
FPO(3)	26	20/09/2019	149	G. GLOSSARY	3757	"vegetation to spread the weight of the load and separate machine tyres or tracks from direct soil contact during harvesting" -> "vegetation to cover soil, spreading the load weight and preventing tyre or track contact with soil during harvesting"	Wording already corrected
FPO(3)	26	20/09/2019	150	G. GLOSSARY	4049	Add to section H: Evaluation Sheets (therefore Code makes their use enforceable), Forest Industry Standard for Prescribed Silvicultural Burning Practice 2009 (should reference a guideline document), Risk Assessment Form, Agreed Procedures	Change made as suggested. Did all except burning one.
FPO(3)	26	20/09/2019	151	G. GLOSSARY	4126	PCH PHCH	Fixed already
FPO(3)	26	20/09/2019	152	General	General	Consistent document structure: Many referenced documents will need updating to accurately relate to the new Code, and it'd be a great opportunity to introduce a more consistent structure. For example, instead of being "Sheets", all our Evaluation fill-ins could be titled as "Forms", tying in a system where FPA has greater right to require the completion of those forms under the Code process for FPP preparation. We've got Guidelines, Procedures, Manuals, Technical Notes, Protocols, Frameworks, Policies and typeless documents (eg. Forest operations around sinkholes), most grouped together in the amorphous lump of 'planning tools'. An accessible system includes a clear structure that identifies a document's role by its title (eg. advisory vs mandatory, info vs necessary step etc).	Outside scope of Code review. FPA is taking measures to address the concerns during review of documents.
Industry (2)	13	16/09/2019	153	N/A	none given	the FPA should ensure that the State Policy on the Protection of Agricultural Land 2009 has been considered in the context of the proposed amendments.	Outside the scope of the Code. The State Policy on Protection of Agricultural Land has a clause about plantation development in certain planning scheme zones. The Code provides prescriptions for plantation establishment and management once a permit has been issued.
Tasmanian Beekeepers Assoc.	22	10/10/2019	154	N/A	none given	related to comment 76 above. Tas Beekeepers have brokered an agreement with STT called "Planning Guidelines for Apiary Values". Comment is "The Guidelines should of course be an annexure to the FPC"	Raised with Steering Committee. Do not add Agreement as Annexe as it is a bilateral agreement between two parties.