



TIMBER TOWNS VICTORIA

A Local Government Association

2022 Proposed Variation of The Code of Practice for Timber Production

Timber Towns Victoria (TTV) is an incorporated Victorian Local Government Association, representing the interests of municipal councils in relation to forestry on both public and private land. The Association's primary function is to provide a forum for local government to address the management of forests and forest industries and their impact on local communities.

TTV is an effective advocacy body that represents many towns and cities across Victoria. Our effectiveness is based on being a peak organisation and acting as a voice for these communities advocating to both the Federal and Victorian State Government on policy and legislation that impacts the timber industry.

Timber Towns Victoria welcomes the opportunity to provide a submission to the 2022 amendments to the Code of Practice for Timber Production 2014 (the Timber Code). It is acknowledged that the proposed 2022 amendments to the Timber Code relates to native timber harvesting and does not impact private or plantation forestry.

The 2022 proposed variation of the Code of Practice for Timber Production needs to keep with its intent which is to provide clear guidance to the industry on obligations.

2022 Proposed variation of the Code of Practice for Timber Production 2014	Timber Towns Victoria - response
1. Do the proposed changes to Code section 2.2.2.10 (relating to the interaction between broad vegetation requirements in the Code and rules for specific species in the Management Standards and Procedures) improve clarity?	Yes this amendment is supported
2. Do the proposed changes to the Tree Geebung prescriptions in Table 14 of the Management Standards and Procedures improve clarity?	Yes This amendment is supported
3. Do the proposed changes to fire management zone clauses in section 5.6.1 of the Management Standards and Procedures improve clarity?	Yes This amendment is supported
4. Do you have any concerns about the way the Management Standards and Procedures have been moved into the draft Code?	No This amendment is supported

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<p>5. Have you identified any administrative errors or inaccuracies in the draft Code?</p>	<p>The formulas in relation to APZ in the Management Standards and Procedures Schedule 1 Amendments are welcome to provide clarity and to avoid misinterpretation. However, the start delay after 1 July 2022 is questionable. As this is essential to bring clarity to at least two cases against VicForests.</p>
<p>6. Do you have any other comments about the proposed amendments?</p>	<p>Yes</p> <p>Timber Towns Victoria's views align with the Victorian Forest Products Association and their list of Recommendations as described below: List of Recommendations</p> <p>Recommendation 1: That the Timber Code (Code of Practice for Timber Production) remains a practical means for harvesting of timber, with Victoria's conservation effort focussed on landscape scale protection in the remaining 95% of Victoria's forests</p> <p>Recommendation 2: That the Government introduces amendments to the Conservation, Forests and Land Act to constrain third party litigation</p> <p>Recommendation 3: That the Victorian Government protects forest coupes scheduled for harvesting against further third-party litigation and takes affirmative regulatory action to ensure the current litigation before the courts is overturned</p> <p>Recommendation 4: That the calculation and thus application of APZ occurs as soon as reasonably practicable following the conclusion of this Timber Code review</p>

Yours sincerely

CR KAREN STEPHENS
President

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