



4 November 2024

Mr Stephen McCutcheon  
Chair of the Nature Repair Committee  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090  
CANBERRA ACT 2601

**Proposed Nature Repair Method: Replanting Native Forest and Woodland Ecosystems**

Dear Mr. McCutcheon,

Thank you for the opportunity to provide a submission to the Committee on the proposed *Replanting Native Forest and Woodland Ecosystems* Method.

As responsible plantation forest managers, OneFortyOne maintains and monitors significant areas of native vegetation across our Australian and New Zealand forest estates.

In South Australia alone, there are more than 40,000 hectares of native vegetation (inliers) within plantation forestry estates.

The sector therefore has an important role to play in repairing Australia's unique natural environment, while growing high-quality timber to help meet the country's need for new housing and supporting thriving rural economies.

OneFortyOne is highly supportive of the Nature Repair Market and the proposed Method. Our comments below reflect a desire to build transparency into the Market from its inception, and to maximise the opportunity for restoration of degraded sites of native vegetation.

For queries related to this submission please contact Jessica Douglas, OneFortyOne's Director of Corporate Affairs and Sustainability on 0400 186 293 or [jessica.douglas@onefortyone.com](mailto:jessica.douglas@onefortyone.com).

Sincerely,

A handwritten signature in cursive script that reads 'Jessica Douglas'.

**Jessica Douglas**

**Director of Corporate Affairs and Sustainability**

## Contents

Background .....	3
About OneFortyOne .....	3
The role of plantation forestry and forestry certification in the management of the Green Triangle's natural environment .....	4
Comments on the Replanting Native Forest and Woodland Ecosystems Method .....	5
Inclusion of degraded – but not cleared – areas in the scope of the Method.....	5
The role of fire in the management of Native Forest and Woodland Ecosystems.....	5
Further clarification of the definition of a 'Suitably qualified person' .....	6
Concluding comments .....	7

## Background

### About OneFortyOne

OneFortyOne is a forestry and sawmill business, majority owned by Australian superannuation and sovereign wealth funds. We operate throughout the Green Triangle region of Australia and the Nelson, Tasman, and Marlborough regions of New Zealand (Top of the South Island). In these communities OneFortyOne is a significant employer, employing more than 500 people directly and hundreds more indirectly as contractors.

In Australia, OneFortyOne's Green Triangle Forests (GT Forests) business operates and manages over 80,000 hectares (ha) of softwood plantation and over 3,500ha of native vegetation and conservation area in the Green Triangle region, an area that spans across South-East South Australia and Western Victoria.

GT Forests undertakes forestry operational activities including establishing, growing, protecting, and harvesting radiata pine plantations. OneFortyOne also owns and operates the Glencoe Nursery, supplying more than 10 million trees annually for OneFortyOne and other forest growers.

OneFortyOne is only one of the forest growers in the region, having a 24% share of the forest estate in the Green Triangle region across softwood and hardwood plantation estates. Our share of the region's softwood plantation forest is approximately 50%. Most of the OneFortyOne GT Forests estate is managed under a Plantation Lease Agreement with the South Australian Government covering plantation lands in South Australia and Victoria. OneFortyOne also owns and manages plantations on freehold land.

In 2018, OneFortyOne purchased the Jubilee Sawmill in Mount Gambier. In the short period under OneFortyOne's ownership, the company has invested \$50 million in the sawmill. A further \$90 million dollar announcement has been made recently, including a renewable electricity co-generation facility. This ongoing investment in modernisation and new technology ensures that the Jubilee Sawmill remains one of the most progressive, productive, and efficient softwood sawmills in Australasia.

**OneFortyOne grows, produces, and delivers wood products in a responsible way that meets rising demand and creates a more sustainable future for people and the planet.**

### Some of our recent contributions include:

- Partnering with the Nature Glenelg Trust (NGT) to restore habitat and re-establish native wetlands at the Mount Burr Habitat Restoration Reserve, as well as additional remediation work in conservation zones.
- In partnership with NGT we have established a five-year Biodiversity Monitoring project to measure conditions and fauna within inliers, identifying future management actions.
- \$90 million investment in the Jubilee Sawmill, including \$30 million for on-site renewable power generation.
- PINE Community Grants program; funding local, community driven projects. 2023 funding for the PINE Program as well as Long Term community partnerships equated to over \$280,000 in the Green Triangle Region.
- Development of the OneFortyOne Emissions Reduction Strategy with a target to reduce Scope 1 and 2 greenhouse gas emissions by 75% from 2021 levels by 2030.

- Remediation work to preserve conservation zones in the GT Forests estate, including targeted competition control and native species revegetation.

OneFortyOne is an active contributor to industry forums including the Australian Forest Products Association, the South Australian Forest Products Association, the Green Triangle Forest Industries Hub (GTFIH) and the Green Triangle Fire Alliance.

### The role of plantation forestry and forestry certification in the management of the Green Triangle's natural environment

The Green Triangle spans the border area between the states of South Australia and Victoria, covering an area of 6 million ha. It is one of Australia's major forestry regions, with extensive plantations of softwood and hardwood resources. Processing activities for the region's timber are centred around the cities of Mount Gambier in South Australia and Portland in Victoria, which also provides the region's port.

Next year, South Australia will celebrate 150 years of plantation forestry. In 1907 the South Australia government, through ForestrySA, began planting large areas of Radiata Pine in the Green Triangle, much of it in areas cleared of native forest or on drained wetland. Among the planted areas, inliers of remnant native vegetation remained in various states of degradation throughout the period of public ownership. Almost seventy years later, in 1973, ForestrySA stopped clearing native forest for new plantation establishment.

Since that time, the ForestrySA Green Triangle plantation estate has been purchased by private investors and continues to be managed for timber production today. A significant majority of the Green Triangle's plantation estate is now certified by either the Forest Stewardship Council (FSC) or Responsible Wood (RW), both of which have clear requirements regarding the maintenance of conservation areas and the control of exotic wildings in areas of native vegetation.

In South Australia, private companies and Forestry SA manage more than 40,000 ha of native vegetation within the plantation estate. These areas are maintained in their existing condition in line with the requirements of forestry certifications, land leases and other legal obligations. In some cases, they are actively monitored with increased conservation and restoration activity.

However, OneFortyOne is of the view that more can be done to increase the biodiversity value of these areas. Appropriate and targeted incentivisation through a transparent Nature Repair Market will enable plantation forestry managers to increase the health and integrity of these inlying areas, creating positive biodiversity outcomes in line with the aims of the Bill.

## Comments on the Replanting Native Forest and Woodland Ecosystems Method Inclusion of degraded – but not cleared – areas in the scope of the Method

The proposed Method states that for an activity area to be eligible, *“the land must have been comprehensively cleared more than 7 years prior to the date of the project application”*.

As the Committee will be aware, much of the wetland environment of south-eastern South Australia has been systematically drained over the past 160 years and cleared for use as productive agricultural and forest land. However, pockets of native vegetation and wetland habitat remain in various states of degradation.

In addition to the reestablishment of native habitats on cleared land, the restoration and connection of degraded wetland habitats could result in enormously positive biodiversity outcomes. However, despite their potential, these areas are considered out of scope of the proposed Method since they have never been entirely cleared.

Those areas of native vegetation lying within plantation forestry estates are typically maintained in their existing condition, in line with the requirements of forestry certifications, land leases and other legal obligations. The Nature Repair Market could play a significant role in incentivising the restoration of these habitats above and beyond their current state by including them within the scope of the Method.

We recognise that this is only the first proposed Method for the Nature Repair Market and a future Method may be created specifically for the restoration of degraded habitats. We welcome a discussion on how current or future Methods could be shaped to incentivise impactful activity in these areas.

## The role of fire in the management of Native Forest and Woodland Ecosystems

The proposed Method states that:

*“Where the project proponent intends to use fire as a mechanism to achieve or maintain the biodiversity outcome for the biodiversity project, the following limitations on the use of fire are intended to apply:*

- *Burning may not take place within activity areas with plantings that are less than 5 years old.*
- *No more than 20% of an activity area is deliberately burnt in any calendar year, unless limited to the ground-layer for the express purpose of removing weed seedbanks.*
- *Areas are not deliberately burnt more than once every seven years.*
- *Areas burnt by bushfire, or a burn conducted in response to an imminent threat from bushfire, must not be burnt for five years following the bushfire event.”*

OneFortyOne recognises that fire plays an important role in the natural cycles of many of Australia’s ecosystems, while also being an important tool to reduce fuel loads and lower the risk of

catastrophic fires. Our estate management teams use prescribed burning regularly within areas of native vegetation for these purposes.

In our experience, the proposed cap of 20% of an activity area being deliberately burnt in a calendar year is problematic, particularly on smaller sites. In many cases, the only way to guarantee that no more than 20% of an area is affected in a burn would be to run substantial firebreaks through an activity area. On smaller sites, this may reduce the positive impacts of any nature restoration activities by reducing the size of the area in which nature can flourish. We therefore suggest that the Committee considers increasing this cap, particularly for smaller sites under 100 hectares.

#### Further clarification of the definition of a 'Suitably qualified person'

For the Nature Repair Market to be successful, the Committee should seek every opportunity to promote transparency in the establishment and ongoing monitoring of projects. We support fully the need for initial and ongoing site assessments to be conducted by a suitably qualified person, as outlined in the Method.

Within the Method, a suitably qualified person is currently defined as:

*"a person*

- *who has a qualification in ecology, botany, or equivalent recognition; and*
- *has at least 3 years, post the award of the qualification, working as an ecologist or botanist or equivalent; and*
- *must have practised as an ecologist or botanist or equivalent within the past 3 years."*

It is our view that the definition of a *suitably qualified person* requires clarification. In particular, the terms 'qualification' and 'equivalent' could include a broad spectrum of learning, some of which would not equip a person with the necessary knowledge and skills to be able to assess a site and provide the credibility the Market needs.

Is the Committee able to provide further clarification – either within the text of the Method or in supporting documentation – on how the experience or qualifications of the suitably qualified person will be assessed within the certification process?

Please note that we are *not* asking for a finite list of specific qualifications the Committee deems acceptable. We recognise that relevant experience and qualifications come in many forms and it would be counterproductive to exclude knowledgeable individuals on this basis. However, to build trust in the Market from the outset, the Committee should provide greater transparency on how a qualified person's suitability is assessed.

## Concluding comments

OneFortyOne believes that the Nature Repair Market has the potential to act as a catalyst for the vital restoration of Australia's unique and world-renowned biodiversity. Vital to the success of the Market will be a rigorous commitment to transparency at all levels, from the developments of Methods to the assessment and ongoing monitoring of sites and their related certifications. The Committee could take a meaningful step in this direction by clarifying how the suitability of qualified persons will be considered during the certification process.

To maximise the potential of the Market, we also urge the Committee to consider how it can incentivise the restoration of degraded areas of native vegetation that have not been cleared, either by including them in the scope of this Method or through a future Method.

Thank you for the opportunity to provide this submission in response to the proposed *Replanting Native Forest and Woodland Ecosystems* Method.

**Jessica Douglas**

A handwritten signature in black ink that reads 'Jessica Douglas'.

**Director of Corporate Affairs and Sustainability**