FOREST MANAGEMENT PLAN
2023 – 2028

for land

MANAGED BY

PENTARCH FORESTRY SERVICES

Promoting Sustainable Forest Management

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Table of Contents

.....1
1. Glossary.....5
2. Forest Management System.....7
2.1. Context of the Organisation.....7
2.1.1. Issues affecting Organisation 7
2.2. Stakeholder needs & expectations.....8
2.3. Scope.....8
2.4. Defined Forest Area (DFA).....9
3. Policy and Commitment.....10
3.1. Leadership.....10
3.2. Policy.....10
3.3. Roles, Responsibilities and Authorities.....10
4. Planning.....11
4.1. Risks & Opportunities.....11
4.2. Compliance obligations.....11
4.2.1. Legislative Requirements 11
4.2.2. Other compliance obligations 12
4.3. Management objectives.....12
5. Support.....13
5.1. Resources.....13
5.2. Training and Awareness.....14
5.3. Stakeholder Engagement & Communication.....14
5.3.1. Communications – internal & external 14
5.3.2. Public Summary information 15
5.3.3. Chain of Custody 15
5.4. Documentation and Records.....15
5.4.1. Records 16
6. Operations.....16
6.1. Operational control.....16
6.2. Emergency Preparedness and Response.....17
7. Performance Evaluation.....18
7.1. Monitoring and evaluation.....18
7.2. Evaluation of Compliance.....19
7.3. Internal Audits.....19
7.4. External Audits.....20
7.5. Management Review.....20
8. Improvement.....21
8.1. Non-conformity and corrective actions.....21
8.2. Continual improvement.....21
9. Sustainability Criteria.....21
9.1. Maintain Forests and Carbon.....21
9.1.1. Maintain Carbon Stocks 21
9.1.2. Climate Positive practices 22

9.1.3. Conversion of natural ecosystems 22
9.1.4. Reforestation 23
9.1.5. Plantation establishment 24
9.2. Forest Ecosystem Health 24
9.2.1. Types of Damage Agents & Threatening Processes 24
9.2.2. Invasive and pest species 25
9.2.3. Integrated Pest Management 26
9.2.4. Pesticides 27
9.2.5. Fertiliser 27
9.2.6. Planned Fire 28
9.2.7. Salvage Operations 29
9.2.8. Degraded Native Forest Rehabilitation 29
9.2.9. Unauthorised and Illegal Activities 29
9.2.10. Waste Management 29
9.3. Biodiversity 30
9.3.1. Significant Biodiversity Value Identification 30
9.3.2. Actions to maintain or enhance Significant Biodiversity Values 31
9.3.3. Maintain native vegetation types and structure 32
9.3.4. Landscape scale diversity 32
9.3.5. Maintaining Habitat biodiversity within the harvest unit 32
9.3.6. Monitoring Biodiversity 32
9.4. Soil and Water Resources 33
9.4.1. Identify Soil and Water Values 33
9.4.2. Protect Soil Properties 33
9.4.3. Maintain Water Values 34
9.4.4. Infrastructure 34
9.5. Productive Capacity 35
9.5.1. Identify forest products 35
9.5.2. Harvest Rates 35
9.5.3. Manage non-wood products 36
9.5.4. Damage to Growing Stock 36
9.5.5. Introduced Genetics (Species selection) 36
9.5.6. Silvicultural Regimes 36
9.6. Cultural Values 37
9.6.1. Heritage Values 37
9.6.2. Indigenous Peoples rights, responsibilities and values 37
9.6.3. Indigenous cultural values 37
9.6.4. Legal and Traditional Uses 38
9.6.5. Traditional knowledge and management practices 38
9.7. Social and Economic Benefits 39
9.7.1. Human rights & needs 39
9.7.2. Health and Safety 39
9.7.3. Worker's Rights 40
9.7.4. Equal Employment 40
9.7.5. School-aged workers 40
9.7.6. Renumeration & conditions 41
9.7.7. Ethical behaviour 41
9.7.8. Local procurement 41
9.7.9. Optimal Use 41
9.7.10. Local industry support and development 42
9.7.11. Sound economic performance 42

9.7.12. Public access 42
9.7.13. Community wellbeing 42
9.7.14. Research 42
Appendix 1: Planning Process Flowchart – NSW Plantations 44
Appendix 2: Planning Process Flowchart – NSW Native Forest 45
Appendix 3: Planning Process Flowchart – Victoria Native Forest and Plantations 46
Appendix 4: Planning Process Flowchart – Tasmanian Plantations 47

1. Glossary

Term	Definition
Auditing	A systematic and documented verification process that objectively obtains and evaluates evidence to determine whether an organisation's management system conforms to sustainable forest management criteria under AS 4708.
Certificate	A document indicating that an organisations Sustainable Forest Management system conforms to AS 4708 and any supplementary documentation required under the CoC system.
Certification body	A body that performs conformity assessment services and that can be the object of accreditation.
Chain of Custody (CoC)	The process of handling of information on the material category of forest-based products which allows the organisation to make accurate and verifiable claims on the content of certified material.
Clearance/Certificate of Completion	A document provided at the end of an activity to indicate that the operation has been completed to the required standard
COFPTP	Code of Forest Practice for Timber Production, Victoria
DEECA	Department of Energy, Environment and Climate Action, Victoria
Defined Forest Area (DFA)	An area of forest including land and water within Australia to which the requirements of the RW Standard are applied, and over which the forest manager can demonstrate management control that allows them to affect achievement of the requirements of the standard.
DPI	Department of Primary Industries NSW
DNRE	Department of Nature Resources and Environment, Tasmania
EPA	Environment Protection Authority NSW
FMU	Forest Management Units
FCNSW	Forestry Corporation of New South Wales
FPA	Forest Practices Authority Tasmania
FPC	Forest Practices Code Tasmania
FPO	Forest Practices Officer, Planning
Forest	An area of land, incorporating all living and non-living components, that is dominated by trees having usually a single stem and a mature or potentially mature stand height exceeding 2 m and crown cover or potential crown cover of overstorey strata about equal to or greater than 20%. Note: This definition includes Australia's and New Zealand's diverse native forests and plantations, regardless of age. It is also sufficiently broad to encompass areas of trees that are sometimes described as woodlands.
Major non-conformance (audit)	Where a significant element of the SFM system is not functional, or where data has been falsified, or there is ongoing resistance to correcting minor non-conformances.
Minor non-conformance (audit)	Where there is a breach of the SFM requirements, and that breach is likely to have a minor impact on the function and intent of the SFM system.
NPWS	National Parks and Wildlife Service NSW
Native vegetation	Any locally indigenous vegetation community containing species and habitats normally associated with that vegetation type.
Operational Plan	includes Forest Practices Plan (FPP), Harvest Plan, or any other plan developed for a particular operation or activity.

Term	Definition
PEFC	Programme for the Endorsement of Forest Certification (PEFC). An international, non-profit, non-governmental organization which promotes sustainable forest management through independent third-party certification.
Pentarch	Pentarch Forestry Pty Ltd, Pentarch Forest Products P/L, Pentarch Logistics P/L, Pentarch Forestry Services P/L
PRA Code	Plantations and Re-afforestation Code, NSW
PNF Code	Private Native Forests Code, for Southern NSW
Rapid Global	An electronic software system used to maintain records (including incident reports, complaints, internal audits) issue actions and monitor performance. The software has been adopted by the Pentarch organisation.
Responsible Wood (RW)	A not-for-profit public company which owns and manages the Responsible Wood Forest Certification Scheme (RWFCS). The RWFCS is built on two Australian Standards – AS 4708 and AS 4707.
SFM	Sustainable forest management
SMS	Safety management system, includes references to Work Health and Safety (WHS) in NSW and Tasmania and Occupational Health and Safety (OHS) in Victoria
VF	VicForests

2. Forest Management System

This Forest Management Plan intends to specify the economic, social, environmental and cultural criteria and requirements for wood production that support continual improvement in sustainable forest management.

Pentarch Forestry undertakes best practice management through a systematic approach to planning and management of operations, which is supported by the framework provided by the Sustainable Forest Management (SFM) standard.

This Plan is the blueprint for achieving the principles of ecologically sustainable forest management. The plan sets out the broad strategies for forest management within Pentarch's DFA for the next five years.

It covers the management of forests within Pentarch's DFA and aims to fulfil the requirements of the SFM standard.

The forest management plan prescribes how the DFA forests will be managed at a strategic level, optimising economic outcomes and mitigating risk factors. Pentarch undertakes further planning at an operational level for more site specific and immediate issues.

2.1. Context of the Organisation

Pentarch Forestry manages just under 6900 ha of land on behalf of Sapphire Forests Pty Ltd within East Gippsland in Victoria and Southeast NSW. There is also 40 ha at the Massy Greene site in Burnie, Tasmania owned by Railpine Pty Ltd. Both of these companies are part of the Pentarch Group of companies.

These properties contain hardwood eucalypt plantations. Approximately 35% of the total defined forest area is native forest that is managed for production, water, biodiversity and conservation values.

In 2020, major bushfires in the East Gippsland, Victoria and Southeast NSW regional areas severely impacted over one third of the Sapphire Forest estate. With a four-year hiatus where no planting occurred between 2012 and 2016 and an intensive plantation harvesting program over the last five years, this has created a large gap in the annual productivity of the estate.

As a result, the main focus for the management of the Sapphire Forest estate in the next five years is to have an intensive re-planting program (over 1200 ha is proposed in the next two years) and to conduct general maintenance activities such as fire management, pest animal and weed control.

The plantation at Massy Greene is due to be harvested in 2023/24 with a view to re-plant.

In addition to managing environmental, cultural and safety aspects of its forest operations, Pentarch actively supports the community in which it operates by providing employment and buying locally where possible.

2.1.1. Issues affecting Organisation

Issues identified as relevant to the organisation include impacts of the activities on both the Sapphire Forests and the Railpine estates on the environment, e.g. water management, management of hazardous chemicals; cultural, biodiversity and social issues raised by interested stakeholders and customer's requirements.

The Certification Steering Committee provides strategic direction on how to manage issues raised and provide input back to how the estate should be managed effectively.

2.2. Stakeholder needs & expectations

As a major supplier of forest products, it is important for Pentarch to demonstrate to stakeholders and customers that the products that it supplies originate from forests that have been certified to an internationally recognised certification standard. The Pentarch Defined Forest Area (DFA) is certified under the Sustainable Forest Management standard AS/NZS 4708 (RW) which recognised by the international body, the Program for Endorsement of Forest Certification (PEFC).

Pentarch has a stakeholder engagement plan is place that describes who their stakeholders are, evaluates what activities may impact these stakeholders and determines how they are affected by its operations. It also identifies the relevant needs and expectations of stakeholders and determines which of those become compliance obligations of the Company.

2.3. Scope

There is an agreement between Pentarch Forestry Services (PFS) and Sapphire Forests to manage plantation activities. They provide a full forest management service covered by this Forest Management Plan within the Defined Forest Area (DFA) described below in NSW, Victoria and Tasmania.

Activities included in the scope of this plan are:

- Plantation establishment
- Infrastructure construction and maintenance
- Fire management
- Silviculture and harvest
- Pest animal/weed control

All activities are managed under the various code of practice within each State that Pentarch operate in. These legal requirements are explained more in section 4.2.1 of this plan. Other compliance obligations identified further in this plan are also considered when managing activities.

Pentarch sustainably manages these forests to produce quality timber products for both the domestic and export market.

Plantations are sometimes used for grazing and/or agistment of cattle or sheep. This helps with weed control as well as providing a service to the local community.

As Pentarch Forestry provides a service to Sapphire Forests for managing the estate, the point of sale occurs when the product is being loaded onto the ship. Sapphire Forests maintains ownership of the product right through the process until it is sold to the export customer.

Pentarch is a certified forest manager and properties can be added to the DFA once they are assessed as suitable and contractual agreements have been established with the landowner giving Pentarch legal management control. Pentarch intends to expand its DFA as a preferred forest manager providing globally recognised certification and access to domestic and export markets.

2.4. Defined Forest Area (DFA)

As a result of the strategy described above, the size and location of Pentarch's DFA can be quite dynamic. A core group of properties owned by Sapphire Forests however, forms the main component of the DFA. There is currently just under 6900 ha of land within the East Gippsland Shire in Victoria, the Snowy-Monaro and Bega Valley Shires in southern NSW. At Pentarch's production facility in Burnie, Tasmania, there is a 40 ha hardwood plantation (including *Eucalyptus nitens, E. globulus* and *E. regnans*) on the site. Much of the Sapphire Forest estate's prior land use was for agricultural use such as mixed sheep and cattle grazing.

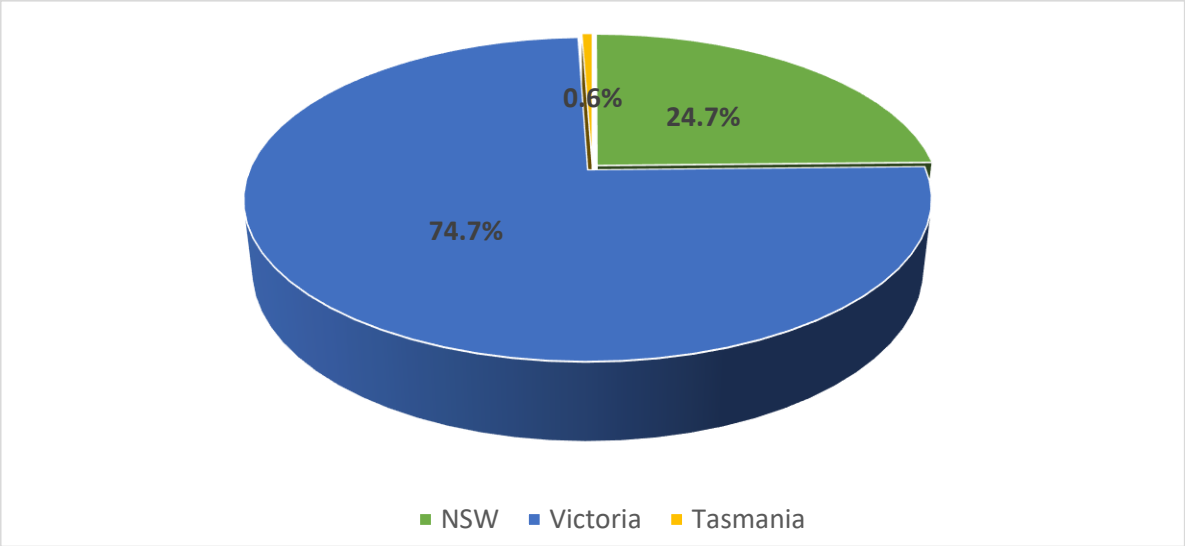
The main land use within Pentarch's catchment area, particularly on the mainland, is public land managed by the relevant state government land agencies (over 80%). While forestry plays a key role within both the mainland and Tasmanian regions, agriculture and tourism are also important industries.

Pentarch's DFA is described by three Forest Management Units (FMU), one in Tasmania and two in mainland Australia.

These are described as:

- Mainland - Hardwood plantations (69%)
- Mainland - Native forest (30.5%)
- Tasmania - Hardwood plantations (0.5%)

It is broken up by state as follows:



Maps are provided on the Pentarch web site at a scale of 1:250,000. Pentarch's DFA can be located by clicking on the following link: www.pentarchforestry.com.au.

Most of the land under Pentarch's control is plantation forest that is managed for timber production. The associated native forest is managed for timber production, carbon, biodiversity and conservation values.

Related Documents:
DFA Register Maintenance Procedure
Overall DFA Register
Maps of DFA (Pentarch Intranet and Website)

3. Policy and Commitment

All Pentarch employees have the responsibility to ensure that any work that they are involved in is carried out in such a way as to minimise the effect and impact on the environment.

A pro-active approach to all sustainable forest management issues is encouraged from all employees.

Suppliers and contractors must demonstrate awareness of biodiversity, cultural heritage, soil and water management and be able to implement appropriate controls.

3.1. Leadership

Top management are engaged through the Certification Steering Committee whose membership includes the CEO, General Managers within the Forestry Division, and the Certification Manager. Strategic direction is provided at these meetings and disseminated through to the sites. Integration of all business processes is also discussed at these meetings.

Results of audits, incident reports are reviewed at these meetings to look for any trends and ways to continually improve processes.

Management demonstrate commitment with respect to the sustainable forest management by:

- Taking accountability for the effectiveness of the sustainable forest management system (SFMS),
- Ensuring that the Sustainable Forest Management Policy and objectives are established and are compatible with the strategic direction of the Company,
- Ensuring that resources required to effectively run the SFMS are made available,
- Communicating the importance of effective sustainable forest management and conforming to SFM requirements both internally and externally,
- Ensuring that the SFM achieves its intended outcomes,
- Directing and supporting persons to contribute to the effectiveness of the SFM, and
- Promoting continual improvement.

3.2. Policy

Pentarch has a Sustainable Forest Management Policy that describes the Company's commitment to safety and the environment, sustainable forest management, stakeholder engagement, compliance with regulatory requirements, provision of resources as well as providing a framework for setting objectives and targets.

A copy of the policy can be found on the Pentarch Forestry (Australia) website and is also available upon request.

3.3. Roles, Responsibilities and Authorities

Responsibilities and authorities for all major elements of the sustainable forest management system, including development and oversight of the forest management plan have been allocated to positions within the Pentarch Forestry organisation. Responsible personnel are also identified within individual procedures describing various activities of the SFM system.

The Certification Manager is responsible for ensuring that the forest management system (FMS) implemented by Pentarch Forestry conforms to the requirements of the standard. This role also includes reporting to senior management on a regular basis through a monthly certification report, quarterly reports to the Pentarch Forestry Board and via the bi-annual certification steering committee. This reporting includes reviewing the performance of the FMS concerning cultural, economic, environmental and social issues.

4. Planning

The FMP is based around identifying the risks and opportunities associated with the Company's operations and developing strategies to mitigate these risks.

To manage these issues effectively, awareness of how the Company's operations can affect meeting the sustainability requirements under the Standard and what compliance obligations need to be met have to be considered. This information can then be used in business planning and in setting objectives and targets.

4.1. Risks & Opportunities

Risks and opportunities were identified within the defined forest area using the sustainability criteria as a guide. It indicates the potential risk of activities, determines the strategy and provides controls to monitor the identified risk.

The risk register contains details about how the aspects and impacts can be managed and how controls are monitored. It is reviewed on a regular basis by the Regional Fibre Manager and Resources Manager at Eden. Reporting on performance of the controls allows the business to understand their effectiveness. Reviewing any incidents, audit results or results of activities provides opportunities for improvement to the forest management system.

Related Document
Pentarch Forestry Risk & Opportunities Register

4.2. Compliance obligations

Compliance obligations can either be due to legislative requirements under State Government or obligations that the Company imposes upon itself to achieve their objectives.

4.2.1. Legislative Requirements

The main legislation applicable to Pentarch's forestry operations within the DFA are:

- NSW Plantations and Reafforestation Act 1999 (PR Act)
- NSW Land Services Act 2013 and associated amendment (LLS Act)
- NSW Biodiversity Conservation Act 2016 (BC Act)
- Victorian Planning and Environment Act 1987 (PE Act)
- Tasmanian Forest Practices Act 1985 (TFP Act)

The relationship of these Acts with Pentarch forest operations is explained within the Pentarch Legal Requirements Management Procedure.

Pentarch's plantation and native forest management systems are conducted in accordance with four main codes:

- NSW Plantation and Reafforestation Code (PRA Code)
- NSW Private Native Forestry Code of Practice for Southern NSW 2022 (PNF Code)
- Victorian Code of Practice for Timber Production 2014 *amended 2022* (COFPTP)
- Tasmanian Forest Practices Code 2020 (FPC)

Other legislation relevant to operations is listed within the Pentarch Legal Register and is managed by the Certification Manager. A procedure for tracking relevant new legislation or amendments to existing legislation is in place and Pentarch subscribes to online newsletters providing regular updates for all states.

The Pentarch Forestry CEO is the executive officer responsible for compliance with legal obligations of the Company and related policies.

Related Documents:
Legal and Other Requirements Management Procedure
Legislation Register

4.2.2. Other compliance obligations

Pentarch voluntarily committed to meeting the AS 4708 standard and undergoes regular independent surveillance audits to monitor compliance with this standard. Continual compliance and improvement to forest management has been achieved using AS4708.

Local council requirements and requirements within Pentarch's own procedures e.g. notifying neighbours of activities, getting feedback from stakeholders can also be considered as compliance obligations.

Any heavy vehicle delivering to, or taking materials from, the Eden Chip Export Terminal (ECET), Eden Export Log Yard and Massy Greene site in Burnie will comply with the vehicle and axle mass limitations, dimensions and configurations specified by the National Heavy Vehicle Regulator (NHVR).

Land and Stock returns are provided to the NSW Local Land Services on an annual basis for five properties as required by the NSW Local Land Services Act 2013.

A Modern Slavery Statement is required by the Pentarch Group (of which Sapphire Forests and Pentarch Forestry Services are a part of) on an annual basis under the Commonwealth Modern Slavery Act 2018. This is done by Pentarch Shared Services Division.

Related Documents:
Heavy Vehicle Mass Management Procedure
Neighbour notification form
Pentarch Group Modern Slavery Statement

4.3. Management objectives

Pentarch's primary objective is to manage a sustainable and profitable forestry business. Pentarch sustainably manages forests to produce quality timber products, recognises the obligations to protect significant environmental values, while also being aware of community expectations and needs.

The management objectives have been identified after analysing the Risks & Opportunities Register and from understanding the compliance obligations that have to be met when managing the DFA.

Measures put in place to achieve these objectives are guided by Pentarch's policy and management system framework and include its Strategy intentions, the Sustainable Forest Management Policy, the Forest Management Plan and Stakeholder Engagement Plan.

The Pentarch Forestry Senior Management Team developed a Strategy Plan for 2019 - 2023 providing information about the strategic direction the company was aiming to achieve. This Strategy is currently being reviewed by Management and the Board of Directors to determine firstly if the strategy was achieved, and secondly, to determine new goals for the next five years for the Pentarch Forestry Division as a whole.

By taking into account this strategy statement, Pentarch's forestry policy and procedures, the main risks identified, compliance obligations and stakeholder considerations, the following objectives have been determined:

- Maintain a safe, healthy and productive workforce,
- Maintain the productive capacity of the DFA,
- Contribute to forest health through weed and pest management programs,
- Respect indigenous peoples rights and values, and legal and traditional uses,
- Maintain biodiversity values within the DFA,
- Maintain soil and water values,
- Minimise loss of carbon stocks,
- Provide economic and social benefits to the community, and,
- Engage stakeholders as part of active management of DFA.

Pentarch Forestry Services is committed to ensuring that the land they manage is sustainable from a production, environmental, cultural and social point of view. The objectives listed above underpin the Company's commitment to independent third-party forest certification and in particular, conformance with the sustainability criteria listed within the Sustainable Forest Management Standard.

The risks and opportunities register provides information on the action taken to meet these objectives and who is responsible for the management of that activity.

Related Documents:
Pentarch Forestry Division – Business Strategy 2019 - 2023
Sustainable Forest Management Policy
Risk & Opportunities Register

5. Support

5.1. Resources

The Company provides resources to help achieve the sustainable forest management objectives that have been set and to encourage enhancement of environmental performance. Those people who have SFM responsibilities as part of their job are supported with the necessary resources. These can include external providers (e.g. consultants with technical expertise, infrastructure, making employees available to do specific works and use of plant where required.)

While assigning resources, management will consider the capabilities and constraints (if any) of the internal resources and determine what needs to be obtained from external providers.

5.2. Training and Awareness

The Company has established procedures for the identification, provision and effectiveness of training for all personnel performing activities affecting sustainable forest management objectives.

Training plans and activities are based on training needs analysis. Personnel whose work can influence the significant aspects are trained to understand and manage the associated risks. Awareness and requirements of the SFM system are included in the induction training of all new workers and is ongoing through regular toolbox talks.

Pentarch is committed to having competent staff and contractors working in DFA operations who are accredited to nationally recognised competency standards.

Contractor competencies are reviewed through the regular auditing of their safety management systems. Staff training records are mainly kept within the local server and through online portals (e.g. Country Fire Authority – brigade training information).

Training for contractors is encouraged by Pentarch and courses are often arranged and organised by Pentarch staff. This particularly occurs when where is changes to crucial legislation. For example, chain of responsibility and truck safety awareness campaigns for staff and contractors (and their employees) have been arranged on behalf of the contractors.

5.3. Stakeholder Engagement & Communication

Pentarch is committed to meaningful stakeholder consultation with its customers, landowners, neighbours, local governments, key state government departments, general interest groups and the community generally.

A formal Stakeholder Engagement Plan has been developed that provides greater detail on how Pentarch engages with its identified stakeholders.

The Stakeholder Engagement Plan recognises the need for effective consultation with affected and interested stakeholders. This plan aids in maintaining and developing the positive relationships the Company representatives have forged with the community and the Company's social licence to operate.

Related Documents:
Pentarch Stakeholder Engagement Plan

5.3.1. Communications – internal & external

The Company has processes in place that maintain the communication of information of significant risks and impacts on all management systems.

Information is provided to all workers, contractors, visitors and other interested stakeholders where relevant.

Internal communication is achieved through:

- In house display of all Management Policies and associated documents on Pentarch Forestry Intranet,
- On the job awareness training,
- Monthly Pentarch Group Updates,
- Monthly certification reports, Certification Steering Committee minutes,
- Regular Toolbox talks and team meetings.

External communication is done through the following means:

- Display of Policies in the office foyer and Pentarch Forestry website,
- Induction Procedures for Visitors and Contractors,
- Advice, site management and performance checklists for contractors and key suppliers,
- Continuing policy of correspondence with general public regarding any complaints relating to Pentarch activities,
- Documenting all complaints and correspondence,
- Advice to affected stakeholders in advance of any operations occurring that may affect them.

5.3.2. Public Summary information

Pentarch provides a first contact public face through its web site www.pentarchforestry.com.au where it posts downloadable information including the Forest Management Certificate, the most recent external audit report summary, the Forest Management Plan and policy and maps of the DFA.

5.3.3. Chain of Custody

Pentarch forest management certification provides for chain of custody from the certified forest estate to the mill door. Product from the forest is identified as certified with accompanying documentation that includes its origin from within the DFA, Pentarch's forest management certificate number and the claim 100% RW/PEFC certified. Delivery dockets (i.e. barcodes or electronic dockets) provide the certification details.

The chain of custody standard provides a secure system with a defined chain of responsibility. Pentarch's chain of custody demonstrates the origin of certified material and provides the certification claims that can be passed on to the market.

Log dockets are checked by contractors prior to leaving the landing to ensure that they have the correct certification information on them. It is the truck driver's responsibility to make sure that log loading and securing is undertaken to comply with the National Transport Guidelines and Pentarch log loading and transport requirements providing safe loads to their destination. Cartage routes are specified by Pentarch and advised to the contractor. Load limits must be observed.

Related Documents:
Chain of Custody Policy
Pentarch Forestry Chain of Custody Systems Manual
Heavy Vehicle Mass Management Procedure
Code of Behaviour for Log Truck Drivers

5.4. Documentation and Records

The management system is supported by documentation including the sustainable forest management policy, the forest management plan and a suite of associated documentation including procedures and work

instructions. These are all available via the Pentarch Forestry Intranet portal. Keeping the documents up to date is managed by the Certification Manager. The documents within the Intranet site are always the most up to date, any printing of these documents makes them uncontrolled.

Other supporting information to help in the maintenance of the management system includes (but is not limited to) Pentarch Group documents that relate to document control, records management, position descriptions, contractor management and emergency preparedness.

Pentarch has also established a Certification Steering Committee (CSC) to guide further refinements in system documentation and procedures, consistent with the Company's commitment to continual improvement.

Related Documents:
Pentarch Group Document Control Management Procedure
Pentarch Group Guidelines for using OneDrive for Business, SharePoint Team Sites and SharePoint Cloud Servers
Pentarch Forest Management Committee – Charter and Procedural Rules

5.4.1. Records

Records relating to each property within the DFA including communication with stakeholders are kept in their individual files either as hard copy or on the local server.

The Company has in place an incident reporting system (Rapid Global) that has the capability to keep a record of all relevant communications with stakeholders and any incidents relating to the management of the DFA. This will include any enquiries that come through the Pentarch website.

Related Documents:
Rapid Global Software Program
Neighbour notification form
Dispute Resolution Procedure
Individual Property files

6. Operations

6.1. Operational control

All activities undertaken within the DFA that are conducted to meet forest management system requirements undergo an assessment to ensure these activities will not significantly impact upon important values within or associated with the planned area.

This assessment may lead to these areas being excluded from development to address any issues that may have been identified. These values include the presence of significant flora and fauna communities, cultural heritage features, visual management, soil erosion controls, exclusion zones around streams, safety and the impact on the local community.

In most cases these issues are addressed by the relevant regulatory authority including the Department of Primary Industry (DPI) NSW, the Environmental Protection Authority (EPA) NSW, the East Gippsland Shire Council (with the Department of Energy, Environment and Climate Action (DEECA) as the referral authority) Victoria and the Forest Practices Authority (FPA) Tasmania.

Operational plans form the basis for management of activities within the Pentarch DFA. They contain the required detail to plan and carry out the nominated tasks and to review and audit outcomes.

These files and plans describe operations including, but not limited to, site preparation, planting, pest animal control, weed control, development of infrastructure (e.g. road construction and maintenance), timber harvesting and haulage and planned fire activities. The operations must meet the requirements of the respective Code of Practice in each State.

Flowcharts describing the process that Pentarch follows for the planning of plantation and harvesting operations in NSW, Victoria and Tasmania are attached to this document (see Appendices 1, 2, 3 and 4). There is also a flowchart within the Pentarch Plantation Establishment Plan that indicates the process and control documents involved for each step of site establishment.

Approvals from the appropriate state or local government agencies (depending on whether the land is in NSW, Victoria or Tasmania) need to be obtained before commencement of any operations. In Tasmania, if a Private Timber Reserve exists over the title, a right to maintain commercial forestry, local government planning approval is not required. The appropriate authorities are advised prior to harvesting.

Pentarch Supervisors conduct regular harvesting inspections assessing operational, safety and environmental aspects and ensure that the operations comply with the requirements of the plan. The information collected identifies any non-conformances, corrective actions, responsibility for actions and forms part of the Pentarch reporting system.

All records (e.g. harvest plans, site preparation plans, maps, checklists) developed for operations conducted by Pentarch are kept electronically on Pentarch's local server and a hard copy is stored within the Forestry office filing system.

PFS staff have assisted the Forestry Corporation of NSW (FCNSW) and NSW National Parks and Wildlife Service (NPWS) on wildfire control operations in the past. Joint fuel reduction burns have also been undertaken with the NPWS. These cooperative arrangements will continue in future.

PFS is part of the Southern Ark Program for fox control in East Gippsland and is an active participant in dog baiting programs in NSW-Victorian communities where the Sapphire Forests estate is located.

Where contractors are used to conduct activities on Pentarch's behalf, they must also conform to the requirements of the sustainable forest management system.

6.2. Emergency Preparedness and Response

The Company has an Emergency Preparedness procedure that identifies the potential for, and response to, accidents and emergency situations. It explains the emergency procedures in place for all Pentarch Forestry Service (PFS) staff working in NSW and Victoria while undertaking their normal duties.

It includes medical emergency and evacuation, unplanned fires, chemical spills, unauthorised access/coupe invasion and vehicle accidents. It also describes the need for testing of the system.

In many cases the emergency procedure and details can be found in the relevant operational plan i.e. native forest harvest plan, plantation works plan, operational burn plan etc

The Massy Greene site where the RailPine estate is situated, also has its own management plan that describes what should happen in the event of an emergency.

Where practicable, Pentarch will periodically test the planned response actions as per the scenarios indicated in the Pentarch Emergency Preparedness procedure. These will be conducted as per the test frequency indicated in the procedure. A review of the responses will occur after the tests have been conducted or in the event of an actual emergency. Responses will be revised depending on the outcome of the review.

Records of the tests will be maintained by the Resources Manager within the Forest Management Library of the Certification Cloud Server and any actual incidents will be recorded within the Rapid Global Incident Module.

Related Documents:
Pentarch Forestry Eden – Emergency Preparedness Procedure
Pentarch Forestry Eden – Working in Isolation SOP
Pentarch Forestry Tasmania – Emergency Management Plan

7. Performance Evaluation

Monitoring of activities on the estate provides feedback to Pentarch management and its contractors on multiple subjects including safety, protection of identified environmental values, production and compliance. Monitoring is aided by the use of field tablets and appropriate software with reports feeding into regular operational meetings.

The internal audit schedule arranges audits over a sample across all activities and informs the monthly certification reports, quarterly board reports and the annual management review.

Non-conformances found are actioned appropriately according to their severity. Any minor or major non-conformance identified through the audit or monitoring processes are recorded within the Rapid Incident module where a root cause analysis can be undertaken and corrective actions applied.

The review of monitoring and conformance aids the development of training and improvements in procedures, planning and implementation.

7.1. Monitoring and evaluation

Pentarch has various processes in place to identify areas and causes of non-conformance or deficiency in the system and implement actions to prevent any non-conformance identified being repeated. These include (but are not limited to):

- Having systems audited by an external body to ensure maintenance of the standard.
- Conducting internal audits on operational requirements.
- Incident reporting.
- Monitoring contractor operations through regular checks and reporting outcome on checklists.
- Annual property inspections.
- Truck overload reporting at the mill site.

Regular reporting by relevant Managers through the quarterly reports to the Sapphire Forests Board provides management the opportunity to review any incidents and identify opportunities to improve performance.

Records maintained within the Rapid Global software program include incident reports, results of audits (internal and external), complaints, any non-conformances raised, who and when it is to be actioned by and details of corrective actions undertaken.

Monitoring requirements are determined through opportunities and risk identified from within the risk register. From this a table has been produced that summarises what needs to monitored, how it is done, when it should occur and how it will be analysed and evaluated. It encompasses progress towards meeting management objectives, forest health, biodiversity and meeting compliance obligations.

Pentarch Contractors are required to have a safety management system in place. These safety management systems are regularly audited for compliance by Pentarch Supervisors.

Related Documents:
Risk and Opportunities Register
Monitoring Requirements Register
Plantation Establishment Plan
Operational Plans
Harvesting Inspection Report Form
WHS Audit Record
Property Inspection Forms
Rapid Incident Module
Forestry Team meeting minutes

7.2. Evaluation of Compliance

Appropriate data is collected and analysed to demonstrate the effectiveness of the management system processes and the evaluation of where improvements in the system can be made. An annual report is collated by the Resource Fibre Manager on activities that have occurred on the DFA and issues arising from those activities. It also provides proposals for the following year and ties into the financial reports for the area. This report complements the annual review of Pentarch's certification systems.

Evaluation of compliance with applicable legal and other compliance obligations is carried out and recorded on a periodic basis, primarily through the monthly certification report to provide timely information to senior management and also through the annual management review process as part of the Certification Steering Committee.

A summary of whether any non-compliances that have occurred and advice of action taken is indicated in these reports. Anything of note is presented to the Board of Directors for Sapphire Forests at their quarterly meeting.

7.3. Internal Audits

Periodic audits of the forest management system are conducted to ensure that it conforms to the requirements of plans developed, is correctly implemented and complies with AS 4708.

Internal audits are conducted annually to cover the key activities within the Pentarch DFA as part of the overall Pentarch Forestry schedule. For further detail on how this is planned and conducted, refer to the Pentarch Audit. Non-conformity and Corrective Actions procedure.

Related Documents:
Rapid Global Auditor

Pentarch Group Internal Audit, Non-conformity and Corrective Actions Procedure
Pentarch Forestry annual Internal Audit Schedule
Internal Audit Report Template

7.4. External Audits

Compliance with forest and management system certification is audited by an accredited, independent, third-party certification body to ensure compliance, continuous improvement and transparency.

A summary of the most recent SFM external audit conducted can be found on the Pentarch website.

7.5. Management Review

The purpose of the management review process is to keep senior management informed in a timely fashion of the status of all certifications held by Pentarch and Allied Natural Wood Enterprises (ANWE). These include:

- Sustainable forest management by Pentarch Forestry (Sapphire Forests Estate in East Gippsland, Victoria and Southeast NSW, the Railpine estate at the Burnie site and any other sites that may be managed by PFS and are part of the DFA),
- Responsible Wood and PEFC Chain of Custody certification for Pentarch Forestry covering fourteen sites in Victoria, NSW, Queensland, Tasmania and South Australia,
- Responsible Wood and PEFC Chain of Custody certification for ANWE covering five sites within Victoria, NSW and Tasmania,

The review includes a summary of any changes in circumstances that may affect the status of any of the certifications listed above, whether identified management objectives have been achieved, it provides information on the performance of the various certification systems including the status of any outstanding actions from previous reviews, any trends in non-conformities and corrective actions, results of external and internal audits, whether compliance obligations have been addressed, are resources adequate to maintain the certification requirements, any stakeholder engagement or complaints, monitoring results, results of any research activities and if there are any opportunities for improvement.

As part of the overall management review process, a certification report is presented to the General Manager, Operations on a monthly basis by the Certification Manager. It provides a summary of audits conducted during the month (both external and internal), any findings raised from these audits and how they have been acted on, whether the internal audit schedule is on track (and reasons if it is not), KPI monitoring performance and any other matters that might affect Pentarch's various certifications.

Any recommendations are put forward for review and endorsement by senior management at the CSC meetings. This will include a conclusion of the effectiveness of suitability of the various certification systems, any decisions relating to continual improvement and any changes that may be required and actions to be taken if the management objectives have not been achieved.

Minutes of these meeting are kept within the Pentarch Forestry Certification Cloud Server and any action items identified are entered into the Rapid Global program.

Quarterly reports are also provided to the Pentarch Board and any items of note regarding certification are indicated within these. This report is managed by the General Manager, Operations Australia.

<u>Related Documents:</u>

Monthly certification reports
Quarterly board reports
Certification Steering Committee minutes
CSC and Forest Management Committee Charter and Procedural Rules
Annual Certification Review

8. Improvement

Opportunities for improvement arising from results of monitoring, internal or external audits and management review shall be determined, and actions implemented where necessary to achieve the intended outcomes of the forest management system.

8.1. Non-conformity and corrective actions

When a non-conformity arises, whether it be from an audit, incident or from monitoring results, it shall be reported within the Rapid Global incident system. This is for minor or major non-conformances only and it allows the auditor to record the following:

- actions taken to correct the non-conformance,
- review and determine the cause of the non-conformance,
- by entering into the incident reporting system there is the ability to see if there are any similar non-conformances or trends occurring,
- review the effectiveness of the action taken to address the non-conformance, and,
- recommend any changes to the forest management system, if required.

Any corrective actions to address the non-conformance should be appropriate to the significance of the effects encountered. Effectiveness of actions are discussed at the Annual Management Review at the Certification Steering Committee meeting.

If any non-conformity raised has the potential to bring the sustainable forest management standard into disrepute, Pentarch will notify the certification body as soon as possible.

8.2. Continual improvement

The Company is committed to the continual improvement of its Sustainable Forest Management System through the process of planning, implementation, measurement, evaluation and management review.
It is intended to continually improve the suitability, adequacy and effectiveness of the SFMS to enhance performance.

9. Sustainability Criteria

9.1. Maintain Forests and Carbon

9.1.1. Maintain Carbon Stocks

Operations managed by Pentarch generate a number of environmental benefits for the community including improving soil conservation and water quality in streams and rivers, maintaining biodiversity and the capture and storage of the major greenhouse gas CO_2 as fixed carbon which has consequences far beyond the area in which the plantations are located.

Pentarch also acknowledges that its plantation estate has the capacity to act as a carbon sink. Within native forest on its estate, there is the capability to increase the amount of carbon storage by promoting natural regeneration after harvesting operations.

Different techniques are continuing to be trialled to maximise the carbon pool. For example, retaining slash during harvesting operations, and leaving stumps in the ground maintains a valuable carbon store and helps to balance the carbon that is released during the harvesting and ground preparation stages. Not burning excess debris after harvest also improves carbon retention.

The Caldwell property has been declared as a registered project under subsection 27(2) of the Commonwealth Carbon Credits (Carbon Farming Initiative) Act 2011. This changes the silvicultural regime from a short-term rotation to a long-term rotation and now includes a thinning operation at 15 years. As a result of this project, the property will attract 1480 Australia carbon credits per annum over 25 years.

A project is currently being looked at with a private company to help improve the soil carbon by triggering the regenerative soil function by tilling which improves soil structure, builds soil carbon through carbon sequestration, and increases water holding capacity and nutrient presence and availability. This improves fertility and increases plant growth as indicated in independent trial results.

It is proposed that a report will be commissioned to measure the estimated current and future carbon storage on the DFA. It will be conducted using a method that provides a scientific justified estimate, for example, the FullCam method as described on the Commonwealth Dept of Climate Change, Energy, the Environment and Water website.

Related Documents:
FullCam method – Commonwealth Dept of Climate Change, Energy, the Environment and Water website

9.1.2. Climate Positive practices

Pentarch aims to reduce fossil fuel use through a number of initiatives including regular maintenance of vehicles, optimising legal haulage distances and the use of appropriate silviculture to maintain forest health and vigour.

Pentarch encourages the use of mass management by haulage contractors to improve efficiencies and reduce fuel consumption per tonne transported.

Related Documents:
Heavy Vehicle Mass Management Procedure

9.1.3. Conversion of natural ecosystems

Pentarch complies with all relevant Commonwealth and State legislation including Tasmania's Permanent Native Forest Estate Policy.

Where small scale conversion for required infrastructure is undertaken within the DFA, a risk assessment is undertaken during the planning phase and appropriate offsets are identified and implemented to ensure the maintenance and enhancement of the permanent forest estate.

If there is a requirement to establish a practical boundary of an operational unit through re-alignment, this will be limited to a maximum of no more than 5 hectares or 1% of the harvest area per year.

In the case of severely degraded land within retained native forest, regeneration or replanting will be used to facilitate rehabilitation.

Any small-scale conversion operations that are undertaken in Tasmania will be approved by the Forest Practices Authority under a Certified Forest Practices Plan. These operations will be carried out in accordance with the Tasmanian Permanent Native Forest Estate Policy. The Forest Practices Plan process allows for the assessment of impacts and processes for protection of significant biological values. All FPP's are certified by a qualified Forest Practices Officer.

Before any native vegetation removal is considered, Pentarch will identify and assess the bioregional impact on any identified Significant Biological Diversity Values and ensure that the area does not include threatened forest ecosystems, old-growth forest that maybe rare or depleted or important habitat of threatened species. The removal would also be subject to relevant planning approvals and aim to achieve a net gain in accordance with the Native Vegetation Framework.

Should any significant biological diversity values be found during the forest planning process, the location of these values will be identified and excluded from any removal operation.

Where offsets are implemented, records will be kept with statements on the significant biological diversity values contained within the offsets and of how the offsets will achieve a net gain in biodiversity in the landscape to compensate for biodiversity loss from conversion.

Non-productive plantation areas may be returned to their original land use in conjunction with second rotation operations.

Any properties that were purchased after 2006 have the appropriate authorisations under the relevant state regulatory authority. In some cases, there were isolated paddock trees or patches that were approved to be removed under this process.

The DFA register provides information on each property regarding its land use history and planning approvals.

9.1.4. Reforestation

If native forest harvesting is undertaken, the method of regeneration will depend on the silvicultural regime adopted. Regeneration will be promoted during harvesting operations through soil disturbance to provide a suitable seed bed and through the retention of seed/habitat trees. Other selective harvest methods rely on existing young growing stock and/lignotubers to provide adequate stocking. In some circumstances, post-harvest burns may be used to ensure a receptive seedbed is available.

Regeneration surveys are conducted 12 – 36 months after harvesting to assess regeneration and stocking rates to ensure the productive capacity of the forest is maintained.

If seed is required for use to assist regeneration, it will be sourced from within the same seed zone. Where practicable, the composition of the forest dominants is maintained. Where selective harvesting operations are undertaken, the species composition is maintained.

Related Documents:
Native Forest Regeneration Assessment Procedure

Forestry Tasmania Technical Bulletin No. 6 (2010): Regeneration Surveys and stocking Standards. https://cdn.forestrytasmania.com.au/uploads/File/pdf/technical_bulletins/tb6_regen_surveys.pdf

9.1.5. Plantation establishment

The establishment of plantations is guided by the Plantation Establishment Plan and outlines procedures in relation to the site preparation, use of chemicals, seedling protection and fire management. Each individual plantation also has its own history file in which any information in relation to the establishment, maintenance and management of the plantation is collated. This is also relevant for second and further rotations of plantations.

Related Documents:
Plantation Establishment Plan

9.2. Forest Ecosystem Health

Experienced forest managers routinely observe forests and their condition, anything unusual is noted in the audit report and reviewed. If there is evidence of poor health in the trees, samples of the foliage are taken and sent to specialists for analysis. When results/recommendations are received, appropriate corrective measures are taken to improve the health of the stand.

Control of damage agents is undertaken on an “as needs” basis in consultation with the landowner and appropriate agencies.

Pentarch staff are aware of Myrtle Rust and Giant Pine Scale and will report any observations to the Biosecurity Department in the State of operation.

Related Documents:
Plantation establishment Plan
Foliar Sampling Procedure
Soil Sampling Procedure

9.2.1. Types of Damage Agents & Threatening Processes

Plantations and associated native forest in the Pentarch DFA are protected as much as possible from the adverse effects of fire and from the introduction and spread of invasive species including weeds, insects and animal pests, plant diseases and pathogens.

Weeds, insects and vertebrate pests that have the potential to significantly affect plantation growth are managed as required, in accordance with health and environmental regulations, using licensed contractors and detailed prescriptions. This control should also constrain any species from entering adjacent land from Pentarch’s DFA.

Survival counts are conducted in the Autumn following planting. If survival rates are unacceptable, the following may be undertaken:

- If testing indicates that the soil type and structure is not adequate, Pentarch may need to look at nutrition or animal browsing as potential causes and then resolve the issue before the next rotation.
- If the ground appears as though it is unsuitable for plantation, Pentarch would recommend that the landowner consider an alternative use.

Climate change has potentially affected fire regimes through the effects of changes to rainfall, temperature, humidity and wind. These changed fire regimes may involve different fire intensity, frequency, seasonality, and patchiness.

Related Documents:
Plantation Establishment Plan
Plantation Inspection Procedure
Survival Count Procedure

9.2.2. Invasive and pest species

Pests and diseases can affect the survival, growth rate and form of individual trees, as well as the quality and value of timber produced.

The impact of pests and diseases needs to be considered at all stages in the development of a plantation.

During the planning stage information on actual and potential threats to tree health can provide valuable input into species selection and suitable locations.

After planting, trees are inspected on a regular basis for the presence of pests and/or disease. This ongoing monitoring and surveillance enables early detection of symptoms and assessment of likely impacts. It also enables remedial action to be taken before the problem becomes critical.

9.2.2.1. Weeds

Competitive weeds must be controlled during plantation establishment as they have the ability to seriously impact on growth rates and survival. The main competition includes grasses such as Paspalum and other pasture grasses.

Weed control is also important in native forests to protect the integrity of any natural areas reserved within the estate.

In addition, the control of certain noxious weeds is required under the NSW Noxious Weed Act 1993, Victorian Catchment and Land Protection Act 1994 and the Tasmanian Weed Management Act 1999.

As most of Pentarch managed plantations occur on ex-pastured land, species such as blackberry will infest cleared areas and some forested gullies where there has been significant disturbance. It rarely occurs within the native forest areas.

There are no extensive infestations of weeds in the native forest within the Pentarch DFA.

A weed eradication diary is kept to record opportunistic occasions where weeds have been removed from part of the mainland DFA. It records the name of the weed, how many plants have been removed, the treatment technique and the location.

An identification field guide to noxious weeds in Southeast NSW and East Gippsland has been developed for use. The field guide is used as a training tool for field staff and is used for the identification and management of weeds when conducting plantation visits.

In the Tasmanian context, the FPP process looks at presence of any declared weeds under the Tasmanian Weed Management Act (1999). If any weeds are identified through this process, applicable control measures are put in place. The FPP also refers to the Tasmanian Washdown Guidelines that are followed for any machinery entering or leaving a property.

As part of the plantation inspections procedure an action plan is developed if any major issues are identified. It has in place certain management decisions that are dependent on the results of the plantation inspection.

Machinery hygiene is important to help prevent the spread of weeds, wash-down guidelines and procedures have been developed.

The actions to reduce the presence of weeds of the DFA are reviewed by the Plantation Forester to determine if the controls have been effective. If it is considered that the current methods used are not effective, they are reviewed and modified where necessary.

Related Documents:
Plantation Establishment Plan
Machine Hygiene Control Procedure
Noxious Weed Descriptions – Southeast NSW and East Gippsland, Victoria

9.2.2.2. Pest Animals

Pest animals are of concern when they impact on tree growth, environmental values of the forest and neighbouring properties.

Protection of young seedlings from browsing is a crucial step in the development of a successful plantation. Domestic livestock are excluded from the area prior to planting by fencing. Other animals such as rabbits, hares and wallabies are more difficult and costly to fence out. Shooting or poisoning may be necessary before and after planting. This does not occur unless the relevant permits have been obtained.

An integrated approach is needed for prevention of browsing to be successful.

Pentarch is represented on regional committees that coordinate feral animal control programs across all land tenures. Pentarch is part of the Southern Ark Program for fox control in East Gippsland and is an active participant in dog baiting programs in NSW-Victorian communities where plantations are located.

Related Documents:
Plantation Establishment Plan
Fencing and Livestock Guidelines
Use of 1080 Procedure

9.2.3. Integrated Pest Management

Pentarch is committed to minimising the use of pesticides, herbicides and fertilisers in its operations.

A number of controls are used to eliminate or minimise impacts arising from chemical use. These include monitoring methods to determine if chemicals are required, selecting safer chemicals, operating to a spray prescription, using only licensed contractors according to label conditions or off-label permits, and marking out sensitive areas on maps which need to be considered in the spray prescription.

Other methods that may be considered, include plant resistance, biological control, pheromone control, physical barriers and traps, fallow management and tolerance of non-economic damage.

Browsing by native animals may be controlled by licensed shooters.

9.2.4. Pesticides

When managing plantations, a small suite of chemicals is considered to address specific threats to the tree crop.

In 2020, the Australia Forest Products Association Certification (AFPA) sub-committee arranged for a consultant to develop environmental and social risk assessments for chemicals commonly used by its' members. Pentarch purchased these risk assessments for the chemicals they use on a regular basis and adapted them for their own operations. From these risk assessments, preventative measures are identified to minimise adverse impacts on social and environmental factors.

Pentarch will not use World Health Organization Class 1A and 1B pesticides unless legally approved for use or pesticides that are banned by any international agreements defined in the Stockholm Convention on Persistent Organic Pollutants 2001.

Spraying guidelines have been developed with the use of agricultural chemicals specifically governed by the Commonwealth Agricultural and Veterinary Chemicals Act 1994. Products will be used in accordance with the label unless an off-label permit is obtained. Guidelines on how chemicals are used at various stages of establishment are documented further in the Plantation Establishment Plan (section 3.6).

All relevant stakeholders are notified before the commencement of any spraying operations.

Pesticide compliance reporting is undertaken to ensure that soil and water protection measures are in place and are being adhered to. Site specific spray plans are developed for each spraying operation. Spray programs are conducted under favourable weather conditions. Spray drift and non-target species impacts are considered as part of this plan.

Related Documents:
Plantation Establishment Plan
Pesticide Purchase and Reconciliation Procedure

9.2.5. Fertiliser

Aside from weed control, planting & fertilising is the most important step in plantation establishment. Timing is critical and there must be sufficient soil moisture at planting time.

A planting and fertiliser plan is developed by the Plantation Supervisor to provide instructions to the contractor regarding dosage. Random checks are conducted at the time of planting to check they are providing the correct dosage as per the instructions.

As an alternative to the normal fertilisers used, a trial is being conducted using an organic fertiliser made up of fish waste and wood residue from the export log yard called Oceans to Earth on one of the plantations.

9.2.6. Planned Fire

Fire management practices are based on reducing the risk of fires entering the plantations, maintaining good access for easy and rapid suppression as well as reducing fuel loads within the native forest within the DFA. Fuel management to limit the intensity and spread of fires and early detection of fires are important components of Pentarch's fire management practices.

Native forest in and around the plantations of Pentarch's DFA is subject to planned burning regimes to protect the plantation commercial value, protect biodiversity values, restore pre-European ecological processes to some of the native forest estate and to minimise the chance of fire spreading onto neighbouring properties.

The management of this occurs within the mainland forest management units (FMU) as this is where the native forest component of the DFA occurs. The Tasmanian FMU deals with plantation only and as such no fire regimes are implemented.

The main disturbance regime used is hazard reduction burning to control the accumulation of flammable material within and adjacent to the estate. This both reduces the likelihood of serious resource damage occurring should an unplanned fire event occur during unfavourable weather conditions and increases the likelihood of controlling or minimising the impact of a fire event should such an event occur. In most situations fire will be excluded from areas of native forest that occur within streamside reserves.

Some areas of native forest are also managed for timber production and post-harvest burning is utilised for the primary aim of reducing the presence of flammable material.

Post burning assessments are conducted to determine whether the objectives of the burn have been achieved and if it has been effective. Depending on the outcome, the use of fire may be amended to increase its effectiveness.

Pentarch liaises with Government agencies and neighbours to co-ordinate fire management activities. When updating the three-year burn plan, Pentarch staff will contact neighbours and fire management authorities to ensure the plan is integrated into other agency plans.

All Pentarch harvesting contractors abide by the relevant State fire management guidelines and undertake a pre-fire season audit to ensure correct equipment is readily available and prepared.

The nature of the fire risk to Pentarch's DFA varies according to a number of factors. These include the location of the property, the proximity to other vegetation, the fuel load including the amount of debris on site and in surrounding areas, slope, aspect and weather conditions.

All Pentarch staff are trained in fire weather observations, wildfire awareness and wildfire suppression strategies. PFS (NSW) are an industry brigade within the Victorian Country Fire Authority.

All harvesting operations have on-site mandatory fire suppression equipment in working order. Equipment such as excavators, bulldozers and floats are available at short notice to assist with the suppression of unplanned fires.

In Tasmania, Pentarch is part of the Forest Industry Fire Management Committee (FIFMC). As part of this group, and in consultation with industry, a set of shut down guidelines for forest operations during high fire danger periods to minimise the risk of fires starting as a result of forest operations has been developed

called "Fire Prevention at Forest Operations". It is mandatory for a copy of these guidelines to be kept on site at all times and stipulates equipment, personnel requirements and mandatory shut down procedures.

Roads, bridges and firebreaks maintained with the Pentarch DFA contribute to regional fire control infrastructure.

Related Documents:
PFS NSW FIB Fire Management Plan (East Gippsland and Southeast NSW)
Fire Management Guidelines
Fire Closure Management Procedure
Planned Burning Procedure
Forest Operations Planning Procedure
Tasmanian Forest Industry Fire Management Committee: Fire Prevention at Forest Operations Procedure

9.2.7. Salvage Operations

Pentarch would consider economic salvage of damaged forest subject to an operational plan that takes account of any reserved areas and significant biodiversity values. Where possible, stand structure and biological legacies will be retained.

9.2.8. Degraded Native Forest Rehabilitation

There have not been any areas of degraded forest identified within the Pentarch managed estate.

Annual property inspections will identify if there is any degraded forest not previously assessed.

If this situation was identified within the DFA any need to rehabilitate would first be discussed with the forest owner and the feasibility of options assessed. Cost effective rehabilitation would be agreed to with the forest owner and would be undertaken where appropriate.

9.2.9. Unauthorised and Illegal Activities

Pentarch and its contractors are mindful of the possibility of illegal activities occurring within the DFA and keep a watch on areas in which they are working. Gates are closed at the end of the day or as required by the landowner. Appropriate signage is erected for active sites and gates for security occur at remote locations. Pentarch also works in cooperation with neighbours for management of illegal access and identification of illegal activities in remote locations.

Pentarch will promptly report illegal activities to the relevant state authority and the landowner.

Collection of evidence is on an "as needs" basis in cooperation with the relevant authorities.

Related Documents:
Stakeholder Engagement Plan
Dispute Resolution Procedure

9.2.10. Waste Management

Substances such as fuel, lubricants and herbicides are potentially hazardous to the environment. Precautions must be made to ensure that these types of substances do not pollute waterways and groundwater.

A risk management approach is taken for those activities that use, produce, convey or store significant quantities of materials that could cause serious or material environmental harm to soils or waters if released.

Pentarch manage fuels, oils, rubbish and emissions in accordance with the requirements of the relevant State forest practices codes. Prescriptions for the management of fuel and oils are noted in the operational plan. There is a legislative requirement to notify the Tasmanian Department of Environment of any fuel or oil spills over 20 litres.

If there is a major storm event, normal prescriptions may not be able to withstand the effects caused by the event. Following a major storm event, plantations managed by Pentarch are inspected as soon as possible to determine damage levels to roads and soils. If damage is found, appropriate remedial works are put into place to re-stabilise affected areas.

Reporting on compliance is done both internally and externally, with independent audits conducted annually.

Related Documents:
Environmental Incident Management Procedure
Spills Management Procedure
Remote Chemical Transfer Procedure
Fuel management requirements for Contractors

9.3. Biodiversity

9.3.1. Significant Biodiversity Value Identification

The identification of biodiversity values (e.g., cultural & natural heritage, soil & water, biological diversity) is undertaken during the initial planning and mapping process prior to the operational plan preparation.

Information and databases produced by the Tasmanian Forest Practices Authority (FPA) and other Government authorities (i.e. EPA NSW, DEECA, Victoria) are the primary source used to identify these values. Relevant biodiversity databases are searched during the planning stages of all operational plans.

In the first instance, existing databases such as the NSW Bionet database and the Threatened Species list under the Flora and Fauna Guarantee Act 1988 (FFG Act) in Victoria are consulted. This is described further in the Threatened Flora and Fauna Procedure. In Tasmania, a number of databases are available and are referenced by Forest Practices Officers (Planning). Any identified sites are then indicated on the operational map and relevant prescriptions applied.

Local FCNSW and DEECA Victoria staff as well as external consultants may also be used to determine the likely presence of endangered, vulnerable and rare species on operational areas before commencement of operations.

Other critical habitat and structural elements such as habitat trees, rocky outcrops, caves and wetlands are identified at the planning stage and prescriptions put in place as per the relevant State Code of Practice.

Depending on the requirements, flora and fauna assessments may be undertaken prior to the commencement of management activities.

There is a known population of the Australian Anchor Plant within one of the Lower Bendoc properties.

Specific objectives to manage this species include:

- protect known populations on PFS managed properties from identified threats such as grazing pressure and accidental destruction;
- reverse the decline in existing populations by actively encouraging natural regeneration; and
- conduct burning trials and trials to reduce grass competition during the seeding period.

Pentarch engaged biodiversity experts in 2020 to conduct a desktop assessment of the potential presence of High Conservation Values (equivalent to significant biodiversity values) within the Sapphire Forest estate. The data within this report provided the basis for the development of the Pentarch Biodiversity Management Plan. Within this plan, potential threats from management activities on threatened species have been identified, describing the potential impact on these values and how they are managed within the estate.

Related Documents:
Biodiversity Management Plan
Identification of Threatened Flora and Fauna Procedure.
FPA Tasmania process for biodiversity special values assessment and planning.
Australian Anchor Plant Management Plan
Biosis (2021) - Desktop identification of High Conservation Value Forest for Sapphire Forests

9.3.2. Actions to maintain or enhance Significant Biodiversity Values

Any threatening impact on biodiversity processes identified throughout the estate will be considered and management strategies will be determined to mitigate any effects that operations might have on biodiversity values. The Pentarch Forestry Services risk register will identify any risk or opportunities relating to biodiversity and allocate actions to address those risks/opportunities.

Mapping of forest types, or any areas identified as biologically significant is also done within the Pentarch (Geographic Information System (GIS) program.

To ensure biodiversity protection occurs in native forests subject to harvesting operations, Pentarch complies with requirements specified in the Victorian COFPTP, the NSW PNF Code and the Tasmanian FPC. If any endangered, vulnerable or rare species are identified as part of the planning process, appropriate prescriptions are put in place as per the relevant codes.

Pentarch conducts baiting programs within the DFA to reduce the effect of feral animals on Critical Weight Range (CWR) animals, birds and reptiles. This is done in consultation with other land managers to co-ordinate locations and make the most of the resources available.

Related Documents:
Biodiversity Management Plan
Plantation establishment Plan
Identification of Threatened Flora and Fauna Procedure.
FPA Tasmania process for biodiversity special values assessment and planning.
Biosis (2021) - Desktop identification of High Conservation Value Forest for Sapphire Forests
1080 Use for Pest Animal Control

9.3.3. Maintain native vegetation types and structure

Most of the native forest that occurs within the DFA estate in NSW, Victoria and Tasmania is described as dry sclerophyll. Eucalypts in the southern NSW and East Gippsland regions generally produce large quantities of seed on a regular basis and regeneration is encouraged through natural means.

As such, native vegetation will occur with species and provenances native to the area. This maintains local gene pool and species mix.

9.3.4. Landscape scale diversity

The maintenance of a mosaic of different habitat types (with a range of disturbance levels) contributes to biodiversity. As part of this mosaic, it is important to connect areas of relatively undisturbed habitat to facilitate movement of fauna through the landscape. To achieve this, corridor exclusion areas are considered when establishing plantations to create a network of relatively undisturbed habitat. Buffer strips form a vital part of this corridor network.

9.3.5. Maintaining Habitat biodiversity within the harvest unit

Habitat biodiversity will be maintained within the harvest unit by retaining remnant vegetation where possible as well as maintaining exclusion zones around waterways. If any dead spars are present within the harvest unit, they are to be maintained if possible, however if it compromises safety of personnel working within the area, it should be removed.

Where trees have been retained, where possible, they will be of differing ages and structure to increase potential habitat for all types of species.

9.3.6. Monitoring Biodiversity

Biodiversity priorities identified through the planning process are monitored during the operation to ensure that the impact of the activity is minimised. This is noted on the operational inspection checklist. If it has been assessed that activities have impacted on identified significant biodiversity values, then an incident report should be completed as to why this has occurred, and corrective and preventative actions put in place to ensure that any future impact is minimised.

Monitoring during the activity is undertaken by Pentarch's highly experienced forest supervisors. Awareness training of Pentarch staff and contractors is ongoing and updated whenever changes to threatened species requirements are made.

The annual inspection of properties within the DFA will assess whether any identified significant biodiversity values have been affected by activities that may have occurred on-site during the year.

A summary of the inspections conducted on the activities done throughout the DFA and any incidents that may have occurred will be included within the annual report.

As the Tasmanian component only consists of less than 1% of the total Pentarch DFA, the Forest Practices Authority's priorities regarding monitoring biodiversity values are followed as part of the FPP process. Biodiversity values are restricted to the plantation management areas under the FPP.

The FPA (Tasmania) issue a regular report that monitors the effectiveness of the biodiversity provisions that are put in place as part the FPC. The latest report can be found on the FPA website (Biodiversity research and monitoring | Forest Practices Authority (fpa.tas.gov.au))

As part of general animal welfare, if an animal is found to be in distress, Pentarch personnel will contact the local WIREs contact or National Parks & Wildlife Service and provide details of the issue. Within the operational plan template, contact details will be included to enable timely resolution should any distressed animals be found while conducting forest management activities.

Related Documents:
Threatened Flora Management Plan - Australian Anchor Plant
Long-footed Potoroo Management Plan

9.4. Soil and Water Resources

As part of the planning process, forestry related activities are identified that may impact on soil and water values.

9.4.1. Identify Soil and Water Values

The various state forest practice codes require that soil properties and water values are assessed during the planning process and protection measures are incorporated into operational plans. Where identified, these values shall be mapped on the operational plan.

The various codes in each state i.e. Southern NSW PNF Code, NSW PRA Code, Victorian COFPTP and Tasmanian FPC provide guidelines to protect soil values on forested land. The prescriptions may vary according to soil type, slope, the intensity and magnitude of timber harvesting, the type and size of harvesting machinery and the season.

The prescriptions specify minimum standards for the location, design, construction and maintenance of timber extraction roads, major extraction tracks and log landings to reduce environmental risks to soil and water quality. This includes the type of drainage required on these roads.

Related Documents:
Road Drainage Guidelines
Tasmanian FPP Planning Process

9.4.2. Protect Soil Properties

Proper care of forest soils is fundamental to sustainable forestry. Provisions in the codes consider soil erodibility, load bearing capacity, soil depth, susceptibility to nutrient loss and susceptibility to landslide. If there are concerns about the nutrient status of a site, soil sampling is conducted, and the samples are sent away to accredited laboratories for analysis.

In Tasmania a planning guide is provided to prompt forest planners. Reference is also made to geology maps, Forest Soils of Tasmania and FPA Forest Soil Fact Sheets that contain detailed descriptions, hazards and management options.

Prescriptions for road and snig track drainage are taken from the codes and where appropriate put into the operational plan.

Related Documents:
Soil Sampling Procedure
FPP Planning checklist

9.4.3. Maintain Water Values

In addition to controlling erosion, the potential to impact on water quality through plantation or native forest operations is reduced by retaining vegetated buffers alongside drainage features. These buffers act as a filter to minimise the risk of sediment laden runoff reaching the drainage feature. These prescriptions are described in the relevant codes and the width of the buffer depends on the size or order of the stream being protected.

Controls are put in place along roads and stream crossings to minimise any potential for sediment to enter these streams as mentioned in section 6.1 above. These prescriptions are described in the relevant state codes of practice. Machine operators are trained in soil and water protection.

The forest practice codes, i.e. Forest Practices Code 2015 (Tas), Forest Soil and Water Protection Manual NSW and the Victorian COFPTP set out prescriptions and guidelines to protect water values during forest operations. These include protection through streamside reserves and guidelines for road construction and harvesting in water supply and their significant catchments.

Timber harvesting may impact upon the quantity of water flowing in streams over time. Water flows from harvested areas will increase immediately after harvesting but begin to decrease as the regenerating forest or plantation establishes.

Management of chemicals including pesticides, fertiliser and hydrocarbons to minimise movement into waterbodies is one of the ways in which water quality is maintained. There are spills management guidelines and procedures in place that ensure that any chemicals are managed away from drainage features to reduce the potential to affect water quality should a spill occur.

9.4.4. Infrastructure

The operational planning process is comprehensive and takes account of existing and planned infrastructure. Maps attached to the operational plans indicate locations of proposed and existing roads and crossings that are used in the operation being planned for. Building or re-instatement of this infrastructure is done in accordance with the relevant state codes of practice.

When construction and maintaining infrastructure, minimising any adverse impacts on biodiversity and soil and water values need to be considered. Values include (but are not limited to) the presence of any significant biodiversity values, migration patterns of key species, riparian zone habitat, not exposing bare soil, preventing soil and debris from entering waterbodies and effectiveness of drainage structures.

Related documents:
Road drainage guidelines
NSW Plantations and Re-afforestation Code (2001)
Victorian Code of Forest Practice for Timber Production (2014)
Tasmanian Forest Practices Code (2015)

9.5. Productive Capacity

Harvesting will be scheduled according to production requirements, seasonal constraints and contractor availability.

9.5.1. Identify forest products

Pentarch currently provides and supplies a number of forest products, including export logs, pulpwood and woodchips to customer specifications. Pentarch is constantly seeking new market opportunities to provide product diversity and improve productive capacity.

The determined annual rate of harvest from the DFA is consistent with sustainable forest management and Pentarch's vision to expand its business in the medium to long term.

Site quality and potential markets are evaluated prior to establishment. This helps to determine the most appropriate plantation spacing to achieve the maximum productive capacity of the site.

9.5.2. Harvest Rates

The hardwood plantation estate currently managed by Pentarch is primarily planted with *E. nitens* with some *E. globulus*. They mostly occur along the escarpment where there is higher rainfall but colder conditions. The productivity of this resource is measured using the mean annual increment (MAI). This provides a measure of how the overall volume is increasing over time and is expressed as tonnes per hectare per year. The current resource ranges from 7.6 in the poorer areas to 22.1 in the better areas with the overall average of 14 tonnes/ha/yr. The aim is to achieve 15 tonnes/ha/year on all plantations.

Harvesting rates are based on the silvicultural prescriptions, the landowner's management intent and advice from PFS including infrastructure capacity, contractor capacity, any operational restrictions including social impacts and prevailing markets. This is indicated in the relevant flowcharts in Appendices 1 - 4. These rates are regularly reviewed at operational meetings.

Specific harvesting objectives are developed for Pentarch Sustainable Harvest Guidelines for both Eucalypt Plantation and Native Forest.

Post-harvest yields from both thinning and clearfell operations, allow a comparison to be made of predicted/planned volumes and the measured sawlog volume and the weights measured over weighbridge for other products. This provides Pentarch with data to improve forest estimates and predicted volumes and monitor contractor performance.

As part of the planning process, the selection of suitable species is considered for plantation establishment appropriate to the site. This is described more fully within the Pentarch Plantation Establishment Plan.

<u>Related Documents:</u>
Eucalypt Plantation Sustainable Harvest Guideline
Native Forest Sustainable Harvest Guideline
Plantation Establishment Plan
Plantation Growth Measurement Procedure
NF Volume Assessment Procedure
Thinning Assessment Procedure
Thinnings Difficulty Class Determination Procedure

9.5.3. Manage non-wood products

Pentarch is not responsible for the regulation of non-wood products from within its DFA.

9.5.4. Damage to Growing Stock

The short rotation and the silvicultural system used (i.e. clearfell for pulpwood production) of plantations effectively eliminates the likelihood of damage to growing stock from harvesting operations.

When conducting operations within native forest, prescriptions within the relevant codes in NSW and Victoria are followed to minimise any damage to forest growing stock. This would include removing debris from the base of standing trees where possible, machinery not using retained trees as 'bumper' trees and the use of directional falling techniques.

9.5.5. Introduced Genetics (Species selection)

The majority of the softwood plantations that Pentarch manages or are likely to manage are predominantly Pinus radiata. There is no known risk of gene mixing with the native population. The spread of wildlings is the greatest risk. This is monitored by Pentarch staff during their normal activities and treatment is undertaken where necessary.

Harvesting equipment has been used to remove pine wildlings resulting from a 1983 wildfire, that dispersed seed over a wide area of native forest, from the DFA at Baelcoola in NSW. Similar equipment has also been used to remove redundant softwood plantings and wildlings from various crown land tenures.

Hardwood plantation species hybridisation is the subject of ongoing research. Species susceptible to hybridisation must be considered in planning preparation. Guidelines have been developed by the FPA (Tasmania) to manage hybridisation between *Eucalyptus nitens* and species such as *E. ovata* (FPA Flora Technical Bulletin 12.)

Pentarch does not use genetically modified trees for plantation establishment. Further detail on species and provenance of seedlings used is indicated within section 3.5 of the Plantation Establishment Plan.

<u>Related Document:</u>
Plantation establishment Plan

9.5.6. Silvicultural Regimes

9.5.6.1. Plantations

Pentarch uses a simple silvicultural system for its managed plantation estate. The eucalypt plantations have a nominal harvest age of twelve years and they are usually clear-felled without any thinning. Pine plantations may be thinned depending on age, productivity, intended outcome and available markets. There is flexibility to vary the age at which harvesting may occur to enable Pentarch to manage the plantations in its DFA according to site and/or market conditions at the time.

Information is collected on growth rates that helps make management decisions on when properties may be included in the future harvest schedule. Availability of wet weather areas also contribute to the planning of harvesting operations.

9.5.6.2. Native Forest

The native forest estate within the Pentarch is mainly managed for non-wood values: water, biodiversity, conservation and cultural heritage. The amount of native forest that may be harvested on Pentarch managed land is a small portion of the total land area.

The most appropriate silvicultural techniques will be used to manage native forests in order to ensure the long-term productivity of the forest. The PNF Code for Southern NSW recommends appropriate silvicultural method/s for different forest structures. The COFPTP is referred to for Victorian forests. Forestry Tasmania Technical Bulletins provide a guide to the most appropriate silviculture in Tasmania.

Harvesting the native forest estate is a board level decision and Pentarch policy dictates that the Company cannot trade any native forest products that are not certified through approved forest management certification schemes.

9.6. Cultural Values

9.6.1. Heritage Values

For any sites of non-indigenous heritage, NSW, Victoria and Tasmania (under the respective Heritage Acts) have registers that can be accessed to determine if there are any sites located in the area that is being planned for forestry activities. During the planning process, any anecdotal evidence may also be followed up. The Tasmanian Forest Practices System includes non-indigenous cultural heritage planning requirements.

If any heritage sites are discovered during the course of operations, the area will be set aside, and the relevant body contacted to assess the site for its heritage value. If it is determined that there is value to the site, it will be protected to ensure damage is avoided.

9.6.2. Indigenous Peoples rights, responsibilities and values

The Company acknowledges and pays respect to the Aboriginal community as the traditional and original owners and continuing custodians of the land managed by Pentarch. It recognises indigenous people's rights and responsibilities in relation to the DFA.

There are no existing rights on the DFA that the Company is aware of through engagement with local communities in and around DFA operations.

In preparing and reviewing the forest management plan, relevant indigenous people are included in the stakeholder engagement process. If any views are put forward, Pentarch will take due consideration as part of the review.

9.6.3. Indigenous cultural values

The protection of Indigenous relics is regulated by the Commonwealth Aboriginal and Torres Strait Islander Heritage Protection Act (1984), NSW National Parks and Wildlife Act 1974, the Victorian Aboriginal Heritage Act (2006), the Tasmanian Aboriginal Heritage Act (1975) which requires that relics not be knowingly disturbed without a permit and that any discovery be notified to the relevant Departments.

As part of the planning process local indigenous people (usually the Local Aboriginal Land Council) may be contacted before the commencement of any activities. Once contacted, the representative or council may

survey the area for potential sites. If certain values or artefacts are found, recommended prescriptions to ensure their protection will be followed. These are noted in the relevant operational plans.

The NSW NPWS also has an Aboriginal Heritage Information Management System that includes a database and recording cards for all Aboriginal objects, Aboriginal places and other Aboriginal heritage values in NSW that have been reported to the NPWS. These may also be accessed when planning operations.

In Victoria any matters dealing with Aboriginal Heritage are managed through the East Gippsland Shire Council as part of their planning process. A Local Provision within the East Gippsland Planning Scheme has an Aboriginal Heritage Policy (point 22.10) that deals with the protection of aboriginal heritage sites.

In Tasmania a Forest Practices Authority endorsed Aboriginal Heritage trained FPO has authority to plan sites and where possible consults the aboriginal community. They have delegated authority to access sensitive data sets to identify priority areas. All aboriginal heritage sites and associated data are recorded in the Aboriginal Heritage Register (AHR) which is administered by Aboriginal Heritage Tasmania (AHT). FPO's can request a search of the register to determine the risk of impact to registered Aboriginal sites.

The States' forest planning codes all have prescriptions in place that are followed should any cultural or heritage sites be discovered. Most heritage and cultural values are effectively maintained by excluding operations in the form of a buffer around an identified site. These are indicated in any operational plans developed. This will help in avoiding damage to any significant items.

Related Documents:
Identification and Protection of Cultural Heritage Procedure
Tasmanian FPP Planning Process
Aboriginal Heritage Standards and Procedures (June 2018) – Aboriginal Heritage Tasmania

9.6.4. Legal and Traditional Uses

There are no known existing legal and traditional uses occurring within Pentarch's DFA.

Access is monitored by Pentarch forest contactors and staff on an informal basis. Some properties have agreements with hunters, as individuals or organisations with permission to access. Some parts of the DFA provide access for beekeepers and for agistment purposes.

Where access is granted, it is done under certain conditions that ensure the integrity of the DFA.

Related Documents:
Good Neighbour Guidelines
Fencing and Livestock Guidelines

9.6.5. Traditional knowledge and management practices

Pentarch will liaise with the local indigenous peoples to identify, and if appropriate, apply traditional knowledge, experience and practices for example when conducting fire management activities.

Where this knowledge is used, free prior and information consent will be obtained and any benefits of the application of the knowledge will be equitably shared.

9.7. Social and Economic Benefits

9.7.1. Human rights & needs

Pentarch respects human rights as defined by the Universal Declaration on Human Rights when conducting its activities.

9.7.2. Health and Safety

The Pentarch Group of companies values its people and their wellbeing. It is committed to providing a safe and healthy workplace for all staff, contractors and visitors. A copy of the Pentarch Group WHSE policy which includes the Pentarch Forestry Division can be found on the Pentarch Intranet.

Pentarch fosters a safe working environment and complies with the NSW Work Health and Safety Act 2011, Tasmanian Work Health and Safety Act 2012 and the Victorian Occupational Health and Safety Act 2004 and associated regulations. Improvements in workplace safety are facilitated through on-going consultation with workers.

The Pentarch Forestry Services team at Eden conducts regular meetings where safety, incidents, compliance and general operational issues are discussed. Minutes of these meetings are kept by the Resources Manager. In Burnie, monthly operational meetings occur where the main topics discussed include any incidents, audits, outcomes from audits and other operational issues.

Pentarch has recently commenced an employee assistance program that provides counselling for work and personal issues which may impact on employee wellbeing. It provides direct access to a counsellor at no cost to the employee and is completely confidential.

The Pentarch Safety Management System is currently being reviewed and updated to provide consistency across the group. This review is being conducted by the Pentarch Group WHSE Manager.

Procedures are in place to manage fatigue. They provide the minimum requirements and relevant information regarding the management of fatigue and the hours of work within Pentarch's places of work. The safety and wellbeing of all Pentarch and associated personnel is the primary focus of the fatigue management procedure.

Operations managed by Pentarch are covered by the various Forest Safety Codes within each State and provide practical guidance for safe work practices and the prevention of injury in the workplace.

Pentarch has a procedure in place that outlines the essential stages in contractor management and the responsibilities and accountabilities for all parties involved at each stage. It acts as a minimum standard for the Pentarch Group of companies. Refer to the Contractor WHSE Management Procedure for more detail.

This process applies to any business or individual defined as a Person Conducting a Business or Undertaking on behalf of Pentarch. It also applies to worksites that have been handed over entirely to a contractor.

Prior to commencement of forest operations, a Forest Operations Safety Plan (or equivalent) is prepared by the forestry supervisor and the harvest contractor. The plan identifies potential hazards and risks associated with a particular operation and identifies ways to minimise these risks.

Related Documents:
Workplace Health Safety and Environment Policy
Fit for Work Policy
Managing Fatigue and Hours at Work Procedure
Contractor WHSE Management Procedure
Contractor WHSE Self-assessment Checklist
Working alone call up Procedure
Emergency Preparedness Procedure
Tree Hazard Management at Fire Operations Procedure
Forest Operations Safety Plan
Contractor Safety Return
Rapid Global Contractor Management

9.7.3. Worker's Rights

Pentarch management respects the rights of employees to join a union or association and to bargain collectively without fear of intimidation or reprisal.

All wage-earning employees enjoy employment conditions that are formalised within either enterprise agreements or modern awards. Any enterprise agreements in place pass the "better off overall test" as set out under the Commonwealth Fair Work Act 2009 and are periodically reviewed with affected employees.

Representatives of organisations representing forest workers such as unions are provided with access and facilities to be able to engage with their members. Pentarch requests that union representatives provide adequate notice before entering the site unless it is for an urgent work health and safety matter.

Related Documents:
Employee Induction handbook
Pentarch Group Disciplinary Process
Pentarch Group Harassment, Bullying and Discrimination Policy

9.7.4. Equal Employment

Pentarch management fully supports the use of equal employment opportunity principles to engage workers. This is expressed clearly within the EEO Policy. Employment decisions are based on merit and ability. Not only are all suitably qualified persons given employment consideration, but those already employed continue to have access to opportunities for progression according to their abilities.

Training and development needs, in relation to enhancing the job currently performed and career planning, are discussed and agreed at the employee's annual performance review. It is both the employees and managers responsibility to ensure that this training plan is carried out.

Related Documents:
Employee Induction handbook
Pentarch Group EEO Policy

9.7.5. School-aged workers

Pentarch shall only engage school-aged workers where such engagement complies with the relevant State legal requirements, contribute to their education and is not harmful to their health and development.

9.7.6. Renumeration & conditions

Renumeration audits are periodically conducted by Pentarch to check that workers have been paid according to the relevant enterprise agreement or award, whichever is applicable. Contractors engaged by Pentarch may also be subject to an audit regarding renumeration.

Pentarch informs new employees of their rights in relation to the National Employment Standards under the Fair Work Act 2009 and the rights with respect to discrimination in the workplace as part of the induction process.

9.7.7. Ethical behaviour

The Pentarch Group has a Code of Conduct under which every employee and contractor is engaged. This puts the onus on staff to conduct business in an ethical manner. The employees must go through a Code of Conduct induction on an annual basis. Training records are kept with the Rapid Global Induct module or within the local server.

Any engagement of a contractor must go through a risk assessment process and be approved by management before they are engaged.

Pentarch has a Modern Slavery Statement that gets submitted on behalf of 31st Century Forests Pty Ltd (ACN 607 144 196) and its Australian related/controlled entities on an annual basis.

Modern slavery is the deprivation of a person's liberty and can take various forms including servitude, forced and compulsory labour and human trafficking.

The Pentarch Group holds integrity, transparency, and empowerment in high regard among its values, and recognises it has obligations to act in a socially responsible and ethical manner in its business practices. The Pentarch Group is committed to ensuring compliance with Australian laws and regulations including the *Modern Slavery Act 2018* (Cth) (**Act**).

9.7.8. Local procurement

The plantation and native forest estate managed by Pentarch delivers significant environmental, social and economic benefits to the Southeast of NSW, East Gippsland Region in Victoria and throughout Tasmania.

Pentarch is a significant contributor to local and regional economies, employing local staff, engaging regionally based contractors and buying locally where possible.

9.7.9. Optimal Use

Pentarch services many markets giving forest owners within its DFA flexibility in providing product optimisation and the best returns. Products include hardwood sawlogs, peelers, hydro-poles, woodchips, fuelwood, bark, mulch, softwood pulpwood, sawlog and veneer logs. Pentarch is constantly looking for new and improved markets to deliver improved outcomes while minimising waste.

Pentarch has demonstrated initiative in finding markets for waste in the Potential Sawlog Retention Project, where commercial thinning was found to advance native forest regrowth and added value to the standing crop.

Funding has also been received under the Wood and Fibre Processing Innovation Program in Tasmania to enhance the current timber and manufacturing centre at Burnie.

9.7.10. Local industry support and development

Pentarch Forestry proactively engages with local and regional processors and considers their needs for supply. It fully supports local processors with value-adding activities for the forest products available in the area.

Within the annual report presented by the Regional Fibre Manager to the Pentarch Forestry Board, a summary will be provided on the material produced from the local processors arising from material received through Pentarch Forestry and the location of where contractors engaged by PFS are based.

9.7.11. Sound economic performance

Pentarch will determine current and future timber requirements with a firm focus on the production of quality forest products. Timing of harvest will depend on harvesting constraints, wood flow requirements of customers or to meet specific market requirements.

Any opportunities for the defined forest area to play an environmental, social or cultural role in the local community will be explored.

9.7.12. Public access

Access to open roads and tracks through Pentarch managed lands for people and vehicles is generally freely available unless otherwise indicated by signage, barriers or similar.

The use of access routes, not including general public access roads across Pentarch managed lands, in conjunction with agricultural operations will require Pentarch approval.

9.7.13. Community wellbeing

The social benefits of Pentarch's plantation and native forest operations include supporting local services such as fire brigades, charities, sporting bodies and community programs.

Pentarch also assists through fire protection and management practices of its DFA, the protection of life and property providing community benefit.

In partnership with the community, Pentarch implements strategies to control and limit the spread of declared pest plants and animals. The Company seeks opportunities to integrate its pest plant and animal management activities into collaborative local area programs through the local Rural Lands Protection Board.

9.7.14. Research

Pentarch continues to base forest management decisions on available research, expert consultant advice, available ecological information and practical experience.

Pentarch maintains interest in research to ensure the best eucalypt plantation species or pine genetics are selected for local conditions.

Research programs also help identify appropriate site preparation and weed control strategies for the various soil types encountered. Low impact establishment for second rotation operations have been investigated and trialled in NSW.

An increase in foraging activity of long-nosed bandicoots following some fuel reduction burning has been observed in mainland plantations. Advice received from a forest ecologist is that the underground fungi favoured by the bandicoots appear to be stimulated by fuel reduction burns.

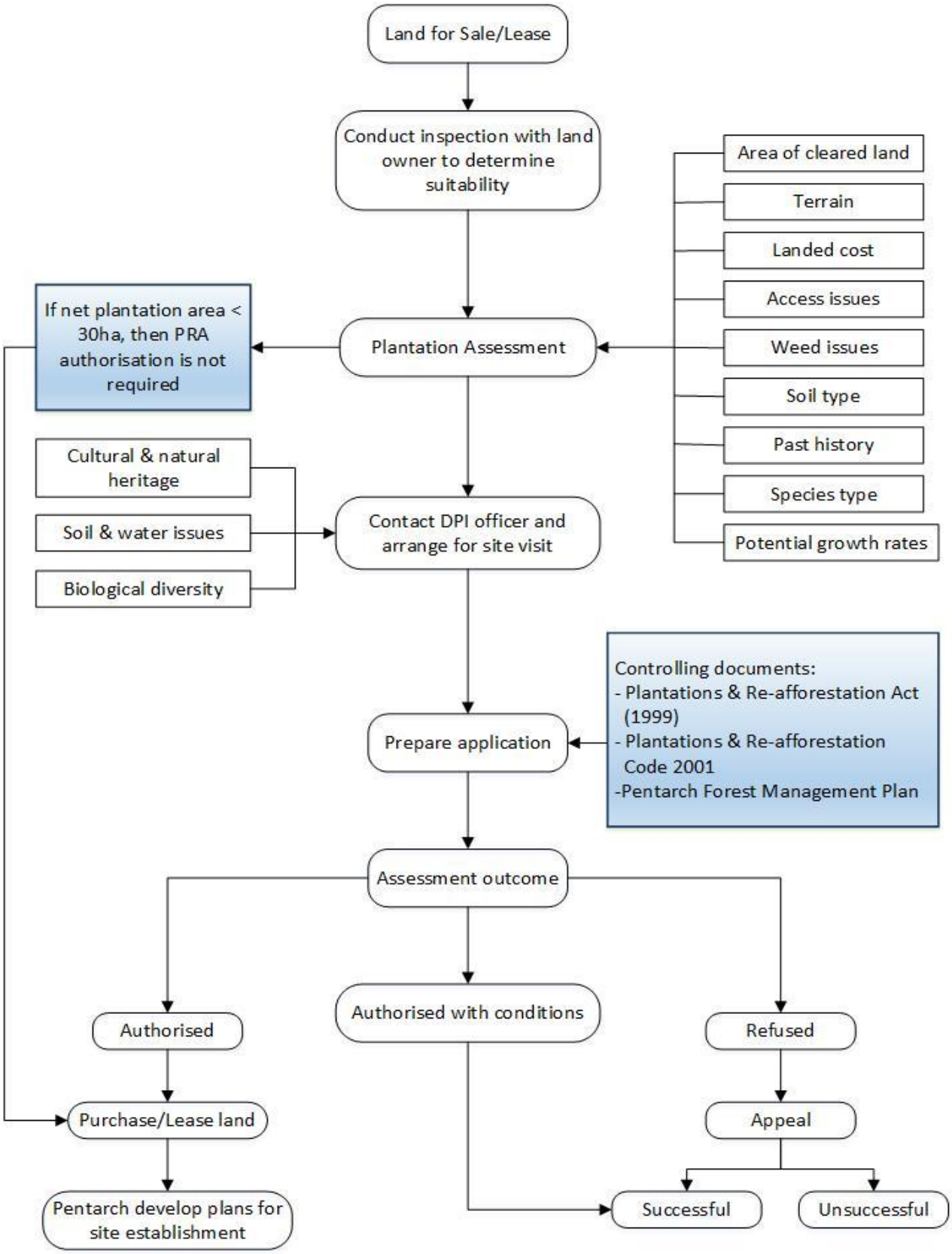
Infra-red cameras have been used within the plantation estate in areas where there may be potentially threatened species. Photos collated as a result of the use of these cameras helps to identify and determine the number and diversity of species using the area.

Pentarch pays the Forest and Wood Products Association and the Forest Growers Association levies, which are used to fund a range of research, development and promotional programs to support the forest industries. Pentarch utilises research notes and guidelines provided by FPA Tasmania that help manage activities within an operational area.

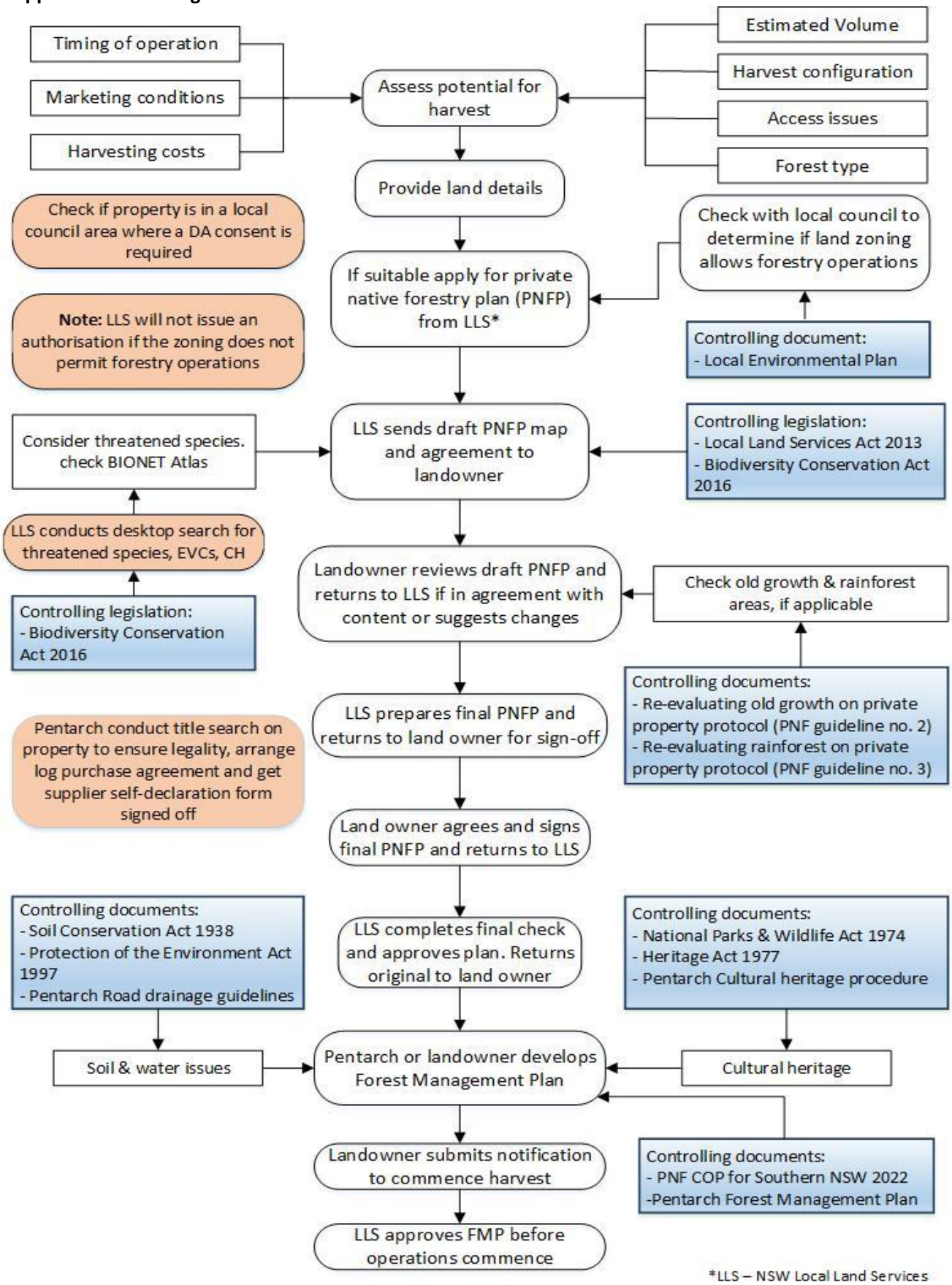
Management of wood residue, alternative uses to the fumigant methyl bromide, the use of drones for stock control and inventory measurement, and the updating of process control and data acquisition systems to enhance the monitoring and management of mills are some of the many projects that are currently being developed by Pentarch staff.

Any current research activity or new proposals are reported to the board at their quarterly meetings.

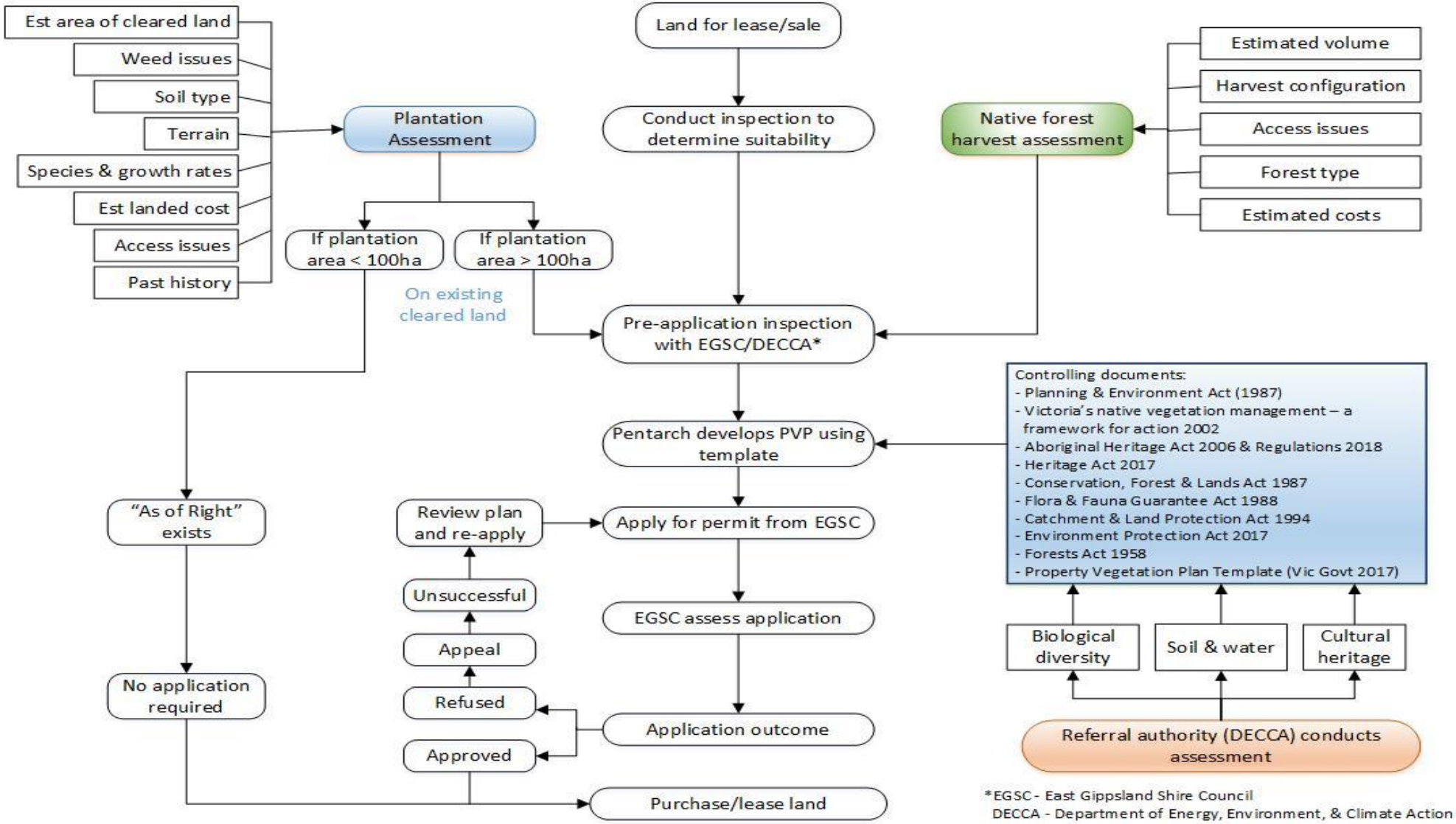
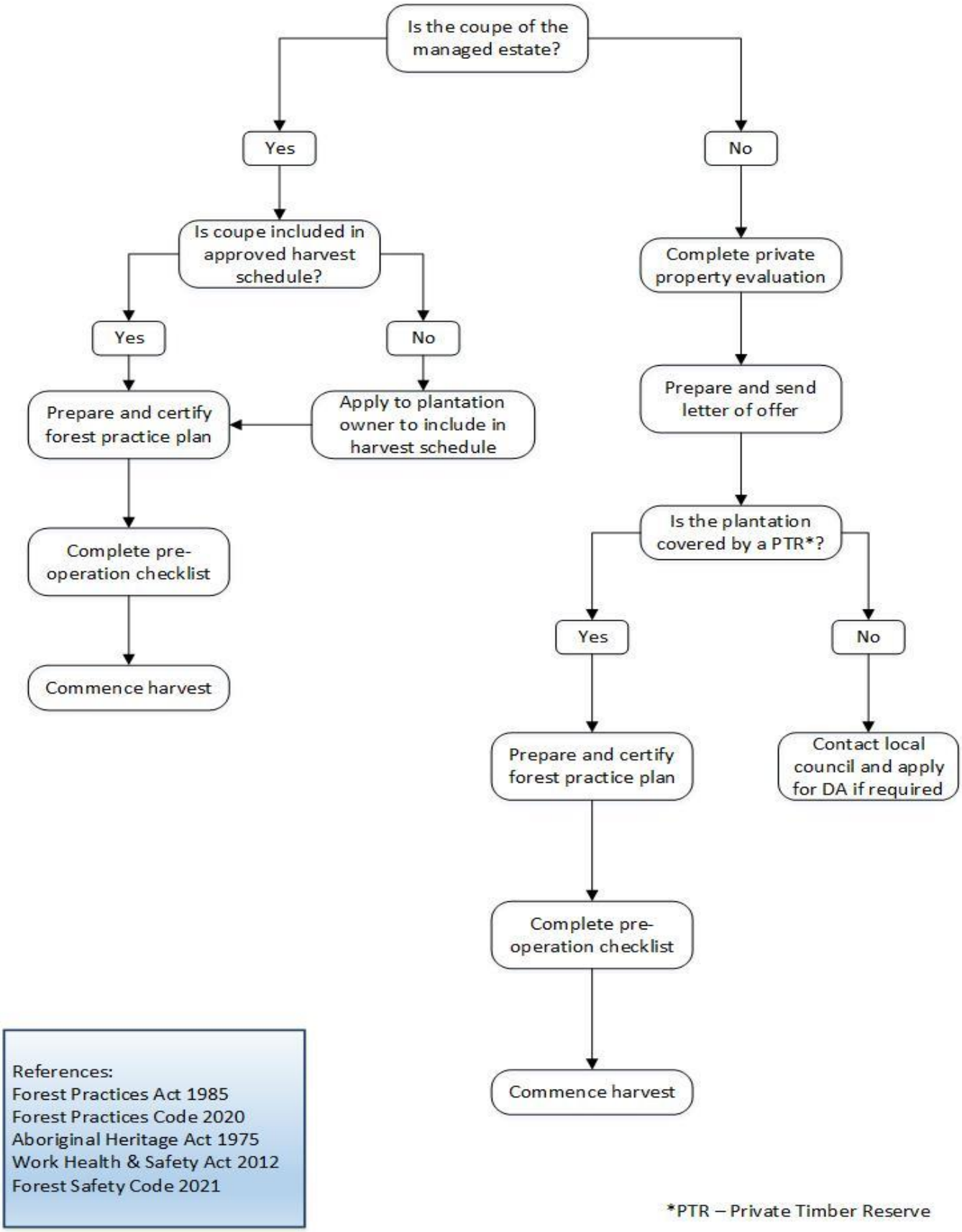
Appendix 1: Planning Process Flowchart – NSW Plantations



Appendix 2: Planning Process Flowchart – NSW Native Forest



Appendix 3: Planning Process Flowchart – Victoria Native Forest and Plantations



Appendix 4: Planning Process Flowchart – Tasmanian Plantations