



PENTARCH
FOREST PRODUCTS

FOREST MANAGEMENT PLAN

Pentarch Forest Products

South East Australia



Promoting Sustainable Forest Management



AFS/01-31-07



PEFC™

PEFC/21-31-07

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Glossary

AFS – Australian Forestry Standard AS 4708:2013

Clearance/Certificate of Completion – document provided at the end of an operation

COFPTP – Code of Forest Practice for Timber Production, Victoria

DEPI – Department of Environment and Primary Industry Victoria

DFA – Defined Forest Area

DPI – Department of Primary Industries NSW

DPIPWE – Department of Primary Industry, Parks, Water & Environment Tasmania

EPA – Environment Protection Authority NSW

FCNSW – Forestry Corporation of New South Wales

FMU – Forest Management Units

FPA – Forest Practices Authority Tasmania

FPC – Forest Practices Code, Tasmania

FPO – Forest Practices Officer, Planning

NPWS – National Parks and Wildlife Service NSW

Operational plan – includes Forest Practices Plan (FPP), Harvest Plan, or any other plan developed for a particular operation

PEFC – The Program for Endorsement of Forest Certification

Pentarch - Pentarch, Pentarch Forest Products, Pentarch Forestry Services (NSW), Pentarch Forestry Services (Tas) all refer to the same entity

PRA Code – Plantations & Re-forestation Code, NSW

PNF Code – Private Native Forests Code, for Southern NSW

SMS – Safety management system, includes references to Work Health & Safety (WHS) in NSW and Tasmania and Occupational Health & Safety (OHS) in Victoria

VF – VicForests

Background

The core business of Pentarch Forest Products Pty Ltd (Pentarch) is the management, harvesting and sales of forests and forest products to domestic and export markets. The Company currently manages approximately 8,000 ha of land with the majority of this being planted to hardwood plantations. Approximately 30% of the defined forest area is native forest that is managed for production, water, biodiversity and conservation values.

Certification to the Australian Forestry Standard (AFS) was originally achieved in 2006.

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 AFS which recognised by the international body, the Program for Endorsement of Forest Certification (PEFC).

Pentarch undergoes regular independent surveillance audits to monitor compliance with the standard. Continual compliance and improvement to forest management has been achieved with AS4708.

As a result of meeting the AFS standard, the management of plantation & native forest operations in NSW, Victoria and Tasmania is conducted in an economically, socially and environmentally sustainable manner.

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.

Scope

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 undertakes best practice management through a systematic approach to planning and management of operations which is supported by the framework provided by the AFS.

Pentarch provides a full forest management service covered by this Forest Management Plan within the DFA in NSW, Victoria and Tasmania.

The 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 operational levels for more site specific and immediate issues.

0. General Requirements

0.1. Defined Forest Area (DFA)

The size and location of Pentarch's DFA is dynamic. Pentarch is a certified forest manager and properties are 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.

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

These are described as:

- Mainland - Hardwood plantations
- Mainland - Native forest
- Tasmania - Hardwood plantations
- Tasmania - Softwood plantations

There is just over 8000 ha of land occurring in the East Gippsland Shire in Victoria, within the Bombala & Bega Valley Shires in Southern NSW and throughout all of Tasmania that is under Pentarch's management control.

It is broken up as follows:

State	Area (ha)
Victoria	5155
NSW	1902
Tasmania (approx.)	950
Total	8007

Maps are provided on the Pentarch web site at a scale of 1:250,000.

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

There are no plans to harvest any products from the Pentarch managed native forest estate over the next three years. Standing volume assessments will be undertaken prior to any harvesting operations being undertaken in the DFA

0.2. 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% AFS/PEFC certified. The monthly sales invoice will contain all required certification information including a link to www.pentarch.com.au to locate a copy of the current forest management certificate.

The chain of custody standard provides a secure system with a defined chain of responsibility.

Log docketts 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.

Pentarch's chain of custody demonstrates the origin of certified material and provides the certification claims that can be passed onto the market.

1. Systematic Management

1.1. Policy

Pentarch has a Sustainable Forest Management Policy that includes commitments relating to safety, sustainable forest management, stakeholder engagement, compliance with legal and other requirements, provision of resources etc. 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 it is also located within the foyers of each Pentarch office.

1.2. Forest Management Plan

This Forest Management 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 DFA plantations and native forest for the next five years.

This plan covers the management of plantations and native forests within Pentarch's DFA and aims to fulfil the requirements of the AFS.

1.2.1. Legislative Requirements

There are four main pieces of legislation that Pentarch follow to cover forestry operations within the DFA. These are:

- NSW Plantations & Reafforestation Act 1999 (P&R Act)
- NSW Native Vegetation Act 2003 (NV Act)
- Victorian Planning & Environment Act 1987 (P&E Act)
- Tasmanian Forest Practices Act 1985

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 & Reafforestation Code (PRA Code)
- NSW Private Native Forestry Code of Practice for Southern NSW 2007 (PNF Code)
- Victorian Code of Practice for Timber Production 2014 (COFPTP)
- Tasmanian Forest Practices Code 2015 (FPC)

Other legislation relevant to operations is listed within the Pentarch Legal Register and is managed by the Systems & Forest Operations Administrator. A procedure for tracking relevant new legislation or amendments to existing legislation is in place and Pentarch subscribes to Lawlex.

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

1.2.2. Objectives & Targets

Pentarch's primary objective is to manage a sustainable and profitable forestry business. The sustainable management and harvesting of forests to produce quality product for the export market is core business. Within this context Pentarch also recognises that there are obligations to protect significant environmental values and be aware of community expectations.

Measures put in place to achieve these objectives are guided by Pentarch's policy and management system framework and include its Sustainable Forest Management Policy, Overall Business Strategy, this Forest Management Plan and Good Neighbour Management Procedure.

Pentarch's main objective to is maintain environmental, heritage and social values across the defined forest area.

This can be achieved by:

- Providing a safe, healthy and productive workforce
- Maintaining certification under AFS/PEFC
- Maintaining productive capacity of the DFA
- Contributing to forest health through weed and pest management programs
- Taking into consideration flora & fauna values and cultural values when planning activities within the DFA
- Minimising the effect of pollution from the road network and associated infrastructure
- Contributing to the carbon cycle
- Providing economic and social benefits to the community
- Engaging stakeholders

1.3. Management Plan Implementation

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.

Pentarch has also established a Certification Working Group to guide further refinements in system documentation and procedures, consistent with the Company's commitment to continual improvement.

1.3.1. Planning & Assessment

All areas that have been managed for plantations undergo assessment to ensure that operations will not significantly impact upon important values within or surrounding 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 & fauna communities, cultural heritage features, visual management, soil and water buffers, 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) or the Environmental Protection Authority (EPA) in NSW, the East Gippsland Shire Council (with the Department of Environment and Primary Industry (DEPI) as the referral authority) in Victoria and the Forest Practices Authority (FPA) in Tasmania.

Operational plans form the basis for management of operations on 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, pesticide control, weed control, roading and timber harvesting. 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 & 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.

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

1.3.2. Operational Plans

It is a requirement of State legislation that operational plans be prepared for all road construction, harvesting, plantation establishment operations, associated infra-structure, fire management and for any other operations that may occur. These plans specify what significant values occur within the plan area and the prescriptions that will be applied to protect them.

These plans are prepared by Pentarch staff under the guidance of the codes applicable to the operation and approved by the relevant authority. In Tasmania a warranted Forest Practices Officer Planning (FPO) must certify the plan. The plans prescribe silvicultural and harvesting procedures using the Victorian COFPTP, the NSW PRA Code and/or PNF Code or the Tasmanian FPC where relevant.

Operational plans are prepared when plantations (and any native forest within the estate that may be harvested) are due for harvest and identify the area to be harvested, the harvesting systems to be used, roading issues, any areas that need to be reserved, protection of soil & water resources, flora & fauna constraints (if applicable) visual and heritage values, where necessary.

The environmental impacts of all forest operations (including roading, harvesting and post-logging burns) will be considered before operations commence and any special conditions will be included in the harvest plan.

The type of information that is contained in any operational plan includes, but is not limited to:

- Location and Land ownership
- Period of planned operations
- Type of harvesting system used (including wet weather areas, locations of landings, extraction pattern if applicable)
- Basic features of the area including forest type, topography, drainage lines, existing access, boundaries etc. These are shown on a map of the specific area as well as described in the plan

- Management requirements or prescriptions that account for special values including; soil & water values, geomorphology, flora & fauna, cultural heritage and visual values
- Other conditions as required (e.g. repairs to fencing)
- Fire protection requirements
- How boundaries are delineated in the field (i.e. tree marking code)
- Safety and emergency procedures
- Sign off of harvest plan and at completion of operation.

Boundaries are marked in the field to ensure that the harvest area is clearly delineated. Operational areas are mapped and the information maintained on the geographic information system.

1.3.3. Harvesting & Haulage Operations

Harvesting and associated haulage of the wood is conducted to maximise utilisation from the forest area using the most cost effective and appropriate methods.

Harvesting is conducted with contractors who have been trained to the required competency standards of safety and environmental care and/or forest practices and can follow the instructions provided as part of the operational plan. The contractor must comply with the relevant codes and guidelines and is required to meet all environmental standards set out in this management plan.

The contractor ensures that all operators are assessed as competent to the relevant training standards. This ensures that prescriptions under the relevant codes of practice are adhered to.

Haulage operations must be safe and adhere to all environmental standards. Vehicles must comply with prescribed load limits and be operated in a manner and at speeds that have regard for the safety of other road users. All loads must be safely and securely fastened.

The maintenance of roads (particularly local council roads) used for timber haulage is an important issue that is addressed in the planning process.

The Victorian approvals process requires prior inspection of roads that will be used during operations. Permit conditions require roads to be maintained to their pre-operation condition.

1.4. Monitoring & Corrective Actions

Pentarch has various processes in place to identify areas and causes of non-conformance and implement actions to prevent any non-conformance identified being repeated. This includes:

- Monitoring contractor operations through regular checks and reporting outcome on checklists
- Conducting internal audits on operational requirements
- Having systems audited by an external body to ensure maintenance of the standard

Monthly reporting by regional managers to the Pentarch Group OHS&E Committee and Certification Working Group provides management the opportunity to review any incidents and identify opportunities to improve performance.

1.4.1. Monitoring Contractor Operations

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 non-conformance, corrective actions, responsibility and forms part of the Pentarch reporting system

Once harvesting has been completed, the area is rehabilitated to the appropriate standards. This includes but is not limited, having in place correct drainage of access roads and other erosion control measures as per the operational plan. If any firebreaks are present in the area, the condition of these is assessed and any maintenance work is carried out to ensure they are trafficable.

A clearance is produced once the Pentarch supervisor is satisfied that the operation has been completed and meets the requirements of all relevant parties.

Pentarch Contractors are required to have a safety management system in place. These are regularly audited for compliance by Pentarch supervisors and includes:

- Observation of Safe Work Procedures,
- Presence of First aid procedures and equipment,
- Emergency evacuation procedures,
- Use of correct Personal Protective Equipment (PPE),
- Appropriate licences,
- Risk assessment procedures and
- Accident reporting system

1.4.2. 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 AS4708.

Internal audits are conducted to cover the key activities within the Pentarch DFA as part of the overall Pentarch Group schedule.

1.4.3. 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.

Summaries of recent external audits conducted can be found on the Pentarch website.

1.5. Review

Issues of the effectiveness of the system and continual improvement are addressed at certification working group meetings. Systems are reviewed for effectiveness and measures taken to implement change and ensure continual improvement in performance outcomes is achieved.

The agenda covers corrective actions, review of compliance audits and the adequacy of monitoring. Interactions with other agencies and stakeholder engagement is reported and reviewed. Minutes of these meeting are kept and action items undertaken.

Pentarch's adherence to the management guidelines presented in this plan will be subject to review in accordance with its commitment to achieve and maintain forest management certification under the AFS.

1.6. Research & Development

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 second rotation establishment operations have been investigated and trialled in NSW and are operational in Tasmania.

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.

Pentarch pays the Forest and Wood Products and the Forest Growers levies, which are used to fund a range of research, development and promotional programs to support the forest industries.

2. Stakeholders

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.

PFS (NSW) is a Forest Industry Brigade (FIB) in the Country Fire Authority (CFA) as required by the Victorian Country Fire Authority Act (1958), section 23AA. The PFS FIB has also provided help to the CFA & NSW Rural Fire Service when required.

The South East Truck Safety Committee was re-formed in 2005 and has membership across both NSW and Victoria. Members include harvest and haulage contractors, State Government agencies (i.e. Forests NSW, VicForests) regulators such as NSW Roads and Maritime Services (RMS) and VicRoads, Wood Processors such as Pentarch and local councils, including Bombala & Bega Valley Shires.

2.1. Identification of Stakeholders

A list of stakeholders is provided in the Pentarch stakeholder engagement plan. These are categorised into affected and interested stakeholders.

2.2. Stakeholder Engagement Plan

A formal stakeholder engagement plan has been developed that provides more detail on how Pentarch engages with its identified stakeholders.

The Stakeholder Engagement Plan recognises the need for effective consultation with affected and interested stakeholders in order to maintain and further the positive relationships it has forged with the community and its social licence to operate.

Pentarch acknowledges the positive contribution that stakeholder perspectives and expertise make to forest management. Pentarch values good relationships with local communities and seeks to have a better understanding about neighbour and community issues with respect to its forest management activities in the context of a DFA owned by individual landowners recognising private property rights and privacy law. It is recognised that consultation is a two-way process of dialogue between the organisation and stakeholders.

Pentarch has developed a dispute resolution process to deal with disputes quickly, transparently and in a common sense way. A mechanism is provided for resolving difficult disputes.

2.3. Stakeholder Participation

Through Pentarch's Good Neighbour Guidelines the Company encourages parties affected by forest operations to raise issues with local staff in the first instance and attempt to resolve any disagreements at the local level.

2.4. Affected Stakeholders

Stakeholders directly affected by planned forest operations are consulted according to the Stakeholder Engagement Plan, as noted above.

2.5. Records

Records of communication with stakeholders are kept in the relevant files for each property.

The Company is currently in the process of developing an incident reporting module (Lucidity) which will have the capability to keep a record of all relevant communications with stakeholders. This will include any enquiries that come through the Pentarch website.

2.6. Public Disclosures

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

3 Biodiversity

3.1. Biodiversity Priorities

Pentarch identifies significant biological diversity values during operations planning. The Pentarch DFA is geographically dispersed and is constantly changing, priorities are established based on current published and available science.

Pentarch uses the procedures produced by the Tasmanian Forest Practices Authority (FPA) and other state Government authorities (i.e. EPA NSW, DEPI Victoria) to identify biological diversity values throughout the DFA. These procedures allow for the identification and assessment of the significance of those values to support their maintenance and protection during the conduct of forest management planning and operations. Relevant biodiversity data bases are searched during the planning stages of all operational plans.

These comprehensive databases for flora and fauna information include threatened species and are managed by the relevant state departments.

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

3.2. Maintenance/Enhancement of Biodiversity Values

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.

3.3. Significant Biodiversity Value Identification

Some areas within forest stands have unique habitat values for a range of species, including threatened species. Threatened species management is subject to external criteria. In Tasmania the Forest Practices Authority has developed expert systems in cooperation with DPIPW. Other areas with unique habitat value (for both terrestrial and aquatic species) include wetlands and heath, which are excluded from operations under the relevant codes.

Significant biodiversity value identification is a vital step in the planning process in NSW and Victoria (refer to relevant steps in Appendices 1,2, & 3).

In Tasmania there are provisions in the code for the management of threatened aquatic and amphibian fauna. For example, all burrowing crayfish, Giant Freshwater Crayfish, Green and Gold Frog, all hydrobid snails and a number of freshwater fish.

Infrared cameras are utilised within the mainland plantation FMU to determine the presence of threatened species such as the Long-nosed Bandicoot.

3.4. Maintenance of Significant Biodiversity Values

Pentarch relies primarily on specialists within the relevant state agencies such as Victorian DEPI, EPA NSW and the Tasmanian FPA to identify the significance of biological diversity values as part of the planning permit/ development application process. Depending on the requirements, flora and fauna assessments are undertaken prior to the commencement of forest operations and consider both the local and regional importance of the biodiversity values identified.

In the first instance existing databases such as the NSW NPWS Atlas and the Threatened Species list under the Flora and Fauna Guarantee Act 1988 (F&FG Act) in Victoria are consulted. In Tasmania a number of data bases are available and are referenced by Forest Practices Officers. Local FCNSW & DEPI 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.

To ensure biodiversity protection 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.

The majority of native forest within the Pentarch Mainland FMU are considered to have low habitat value. Often high habitat value forest occurs within drainage features that are protected through the buffer strip and wildlife corridor system.

3.5. Monitoring Biodiversity

Biodiversity priorities identified through the planning process are monitored at the coupe level within the DFA.

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

3.6. Review of Biodiversity Vales

Pentarch actively searches available current databases in the development of operational plans. This ensures that the information being sought is up to date.

Other areas where information is obtained includes FPA newsletters & notices, lawlex alerts for threatened species and ongoing training.

3.7. Native Forest Regeneration

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 pools and species mixes.

3.8. Introduced Genetics

The majority of the softwood plantations that Pentarch manages or are likely to manage is 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 undertaken where necessary.

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.

3.9. Native Forest Conversion

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.

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 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 maybe returned to their original land use in conjunction with second rotation operations.

A register of native forest conversion is kept in the relevant filing system.

4 Productive Capacity

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

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.

4.1. Productive Capacity Identification

Pentarch currently provides a number of 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.

4.2. Harvest Rates

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.

4.3. Plan & Monitor use

The forest practices planning process provides significant input and resources to maintain the productive capacity of forests. Issues such as soil compaction, drainage, firebreaks, and inappropriate silviculture are covered and accounted for within the operational plan.

A regular inventory program is conducted on plantations currently managed by PFS enabling the accurate modelling of future product volumes and the development of a five year wood flow plan.

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.

4.4. Infrastructure

The planning process to develop an operational plan is comprehensive and takes account of existing and planned infrastructure. Maps attached to the operational plans indicate locations of proposed and existing roads & 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.

4.5. Silvicultural Regimes

4.5.1. 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.

4.5.2. 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 AFS (PEFC) or FSC.

4.6. Establishment

4.6.1. Native Forests

If harvesting is undertaken, the method of regeneration of native forests will depend on the silvicultural regime adopted. Regeneration may 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.

Seed for use in regeneration is to 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.

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

4.6.2. Plantations

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.

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 & structure is not ok, 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.

4.7. Minimising Damage to Growing Stock

The short rotation of *E. nitens* plantations effectively eliminates the likelihood of damage to growing stock from harvesting operations.

4.8. Unplanned Fire

The nature of the fire risk 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, wild fire awareness and 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.

Pentarch in consultation with Industry has developed 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. The Tasmanian Forest Industry Fire Management Committee (FIFMC) has developed a procedure called "Fire Prevention at Forest Operations". It is mandatory for a copy 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.

4.9. Non-wood products

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

5 Forest Ecosystem Health

5.1. Types of Damage Agents

Plantations and associated native forest in the Pentarch DFA is protected, as much as possible, from the adverse effects of fire and from the introduction and spread of weeds, insect and animal pests and plant diseases.

Weeds, insects and vertebrate pests that have the potential to significantly affect plantation growth are controlled as required, in accordance with health and environmental regulations, using licensed contractors and detailed prescriptions.

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

5.2. Maintenance of Forest 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 a 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.

5.3. Weeds & Pests

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 if necessary, before the problem becomes critical.

5.3.1. 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 that occur within the plantation estate 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.

An identification guide to noxious weeds in Southeast NSW & 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.

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.

5.3.2. 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 & 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.

5.4. Fire & Disturbance Regimes

Hazard reduction burning and wildfire suppression is carried out to protect life and property, and the timber and natural values on the Pentarch DFA and to minimise the chance of fire spreading onto neighbouring properties.

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.

5.5. Degraded Forest

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

However, any need to rehabilitate is first discussed with the forest owner and the feasibility of options assessed. Cost effective rehabilitation as agreed with the forest owner will be undertaken where appropriate.

5.6. Chemical Use

Pentarch will not use World Health Organization Class Ia and Ib 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 and the label is the law 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.

5.7. Damaged Agent 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.

6. Soil & Water Resources

As part of the planning process forestry related activities are identified that may impact on soil and water values. This has been done as part of the Pentarch FMS Aspects & Impacts Register identifying the effects of operations on soil & water and measures to ensure their protection have been developed.

6.1. Soil & Water Values

The various codes in each state i.e. Southern NSW PNF Code & NSW PRA Code the 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

6.2. Water Quality

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. Again 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 also 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.

6.3. Water Quantity

The forest practice codes: 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.

This effect maybe localised as a Bureau of Rural Sciences Paper written in 2004 regarding Plantations and Water stated that the impact plantations have on stream flow is difficult to detect in smaller catchments when less than 20% of the catchment was planted. Pentarch managed plantations are dispersed throughout Southeast NSW, East Gippsland and Tasmania and harvesting may have negligible impact on water quantity.

6.4. Soil Properties

The forest practice codes require that soil properties and erosion hazards are assessed during the planning process and protection measures are incorporated into operational plans.

Proper care of forest soils is fundamental to sustainable forestry. Provisions in the forest practices 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 sent away to specialists for analysis.

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

6.5. Pollution

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, Pentarch plantations 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.

7. Carbon Contribution

7.1. Carbon Cycle

Pentarch operations 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 CO₂ as 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 carbon stock by promoting natural regeneration after harvesting operations.

Pentarch is continuing to trial different techniques to retain slash, for example, during harvesting operations, stumps are left in the ground which 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 improves carbon retention.

7.2. Fossil Fuel Usage

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

Pentarch encourages the use of mass management by haulage contractors

7.3. Carbon Storage Measurement

Pentarch uses a simple calculator to estimate the quantity of carbon stored in plantations 6 years of age and older. A calculation for native forests and fallow land may be developed in future.

8. Cultural Values

8.1. Indigenous Peoples Values

Pentarch acknowledges and pays respect to the Aboriginal community as the traditional and original owners and continuing custodians of the land managed by Pentarch.

Pentarch recognises indigenous people's rights and responsibilities in relation to the DFA. 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 they survey the area for potential sites and if found recommend prescriptions to ensure their protection. These are noted in the relevant operational plans.

In Tasmania Registered Forest Practices Officers that have completed the Aboriginal Cultural Heritage training have access to restricted data bases enabling them to identify higher risk sites and plan as prescribed.

There are no existing rights on the DFA.

8.2. Indigenous Heritage Values

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

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.

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.

8.3. Other 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 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.

8.4. Legal and Traditional Uses

No legal rights apply on 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 to access. Likewise some parts of the DFA provide access for beekeepers.

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

9. Social & Economic Benefits

9.1. Regional Development

The plantation and native forest estate managed by Pentarch delivers significant environmental, social and economic benefits to the South East 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. Tasmanian operations provide a recent example of economic growth and benefit. Market confidence and expansion of the contractor workforce has injected millions of dollars in equipment investment into North West Tasmania, providing confidence to banks for home lending and benefiting more than 150 families.

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.

9.2. Optimal Use

Pentarch services many markets giving forest owners within its DFA flexibility in providing product optimisation and the best returns. Products vary from hardwood sawlogs, peelers, hydro-poles, woodchips, fuelwood, bark and mulch to 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, commercial thinning advanced native forest regrowth to value add to the standing crop.

9.3. Illegal Activities

Pentarch and its contractors 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 for active sites and gates for security occur at remote locations. Pentarch also works in cooperation with neighbours for management of illegal access and activities in remote locations.

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

Collection of evidence is on a needs basis in cooperation with the relevant authorities.

Pentarch attempts to resolve all disputes by face to face negotiation in a respectful manner. All communication is documented.

9.4. Skills Development

Pentarch is committed to train staff to work competently based on, and accredited to, nationally recognised competency standards. Pentarch also supports equal employment opportunities, identifies and implements actions to support employment and skills development of its workers.

9.5. Health & 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 WHS&E 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 & Safety Act 2004 and associated regulations. Improvements in workplace safety are facilitated through ongoing consultation with workers.

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.

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 the particular operation and identifies ways to minimise these risks.

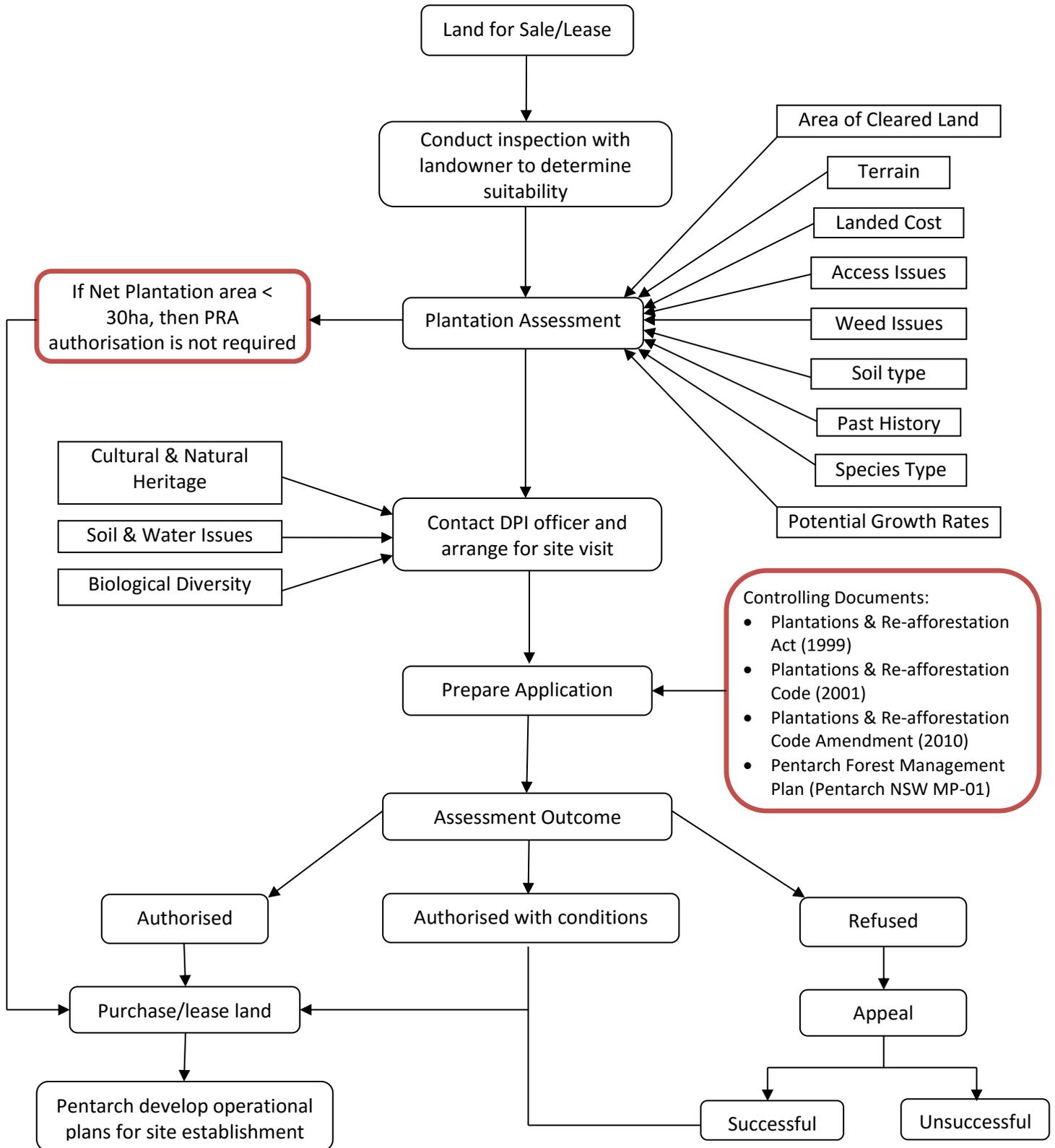
Before engaging contractors, Pentarch provides them with a self-assessment checklist and ensure they meet the standards required.

9.6. Worker's Rights

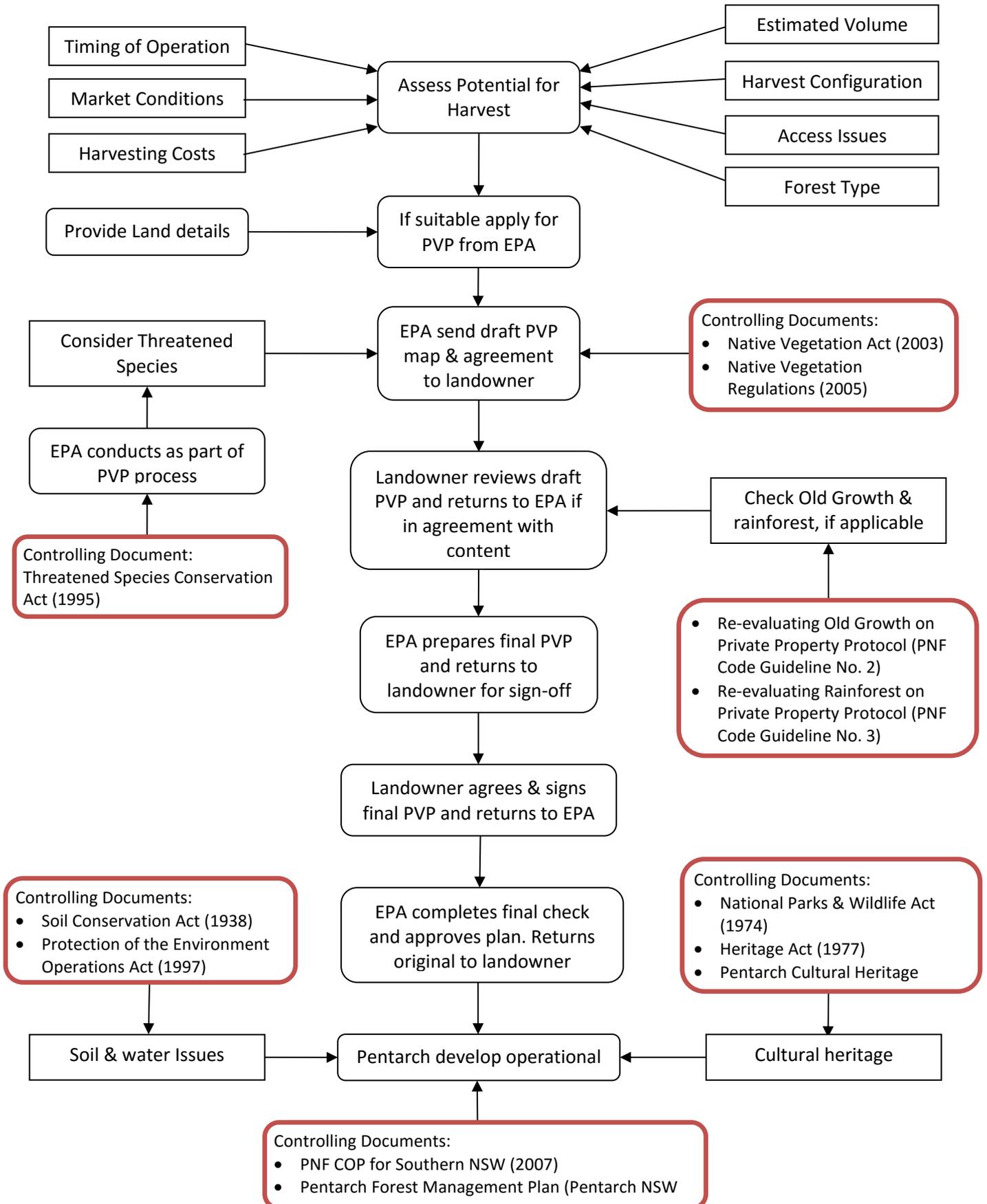
Pentarch management respects the rights of employees to join a union or association and to bargain collectively without fear of intimidation and reprisal.

Pentarch informs new employees of their responsibilities with respect to discrimination in the workplace as part of the induction process.

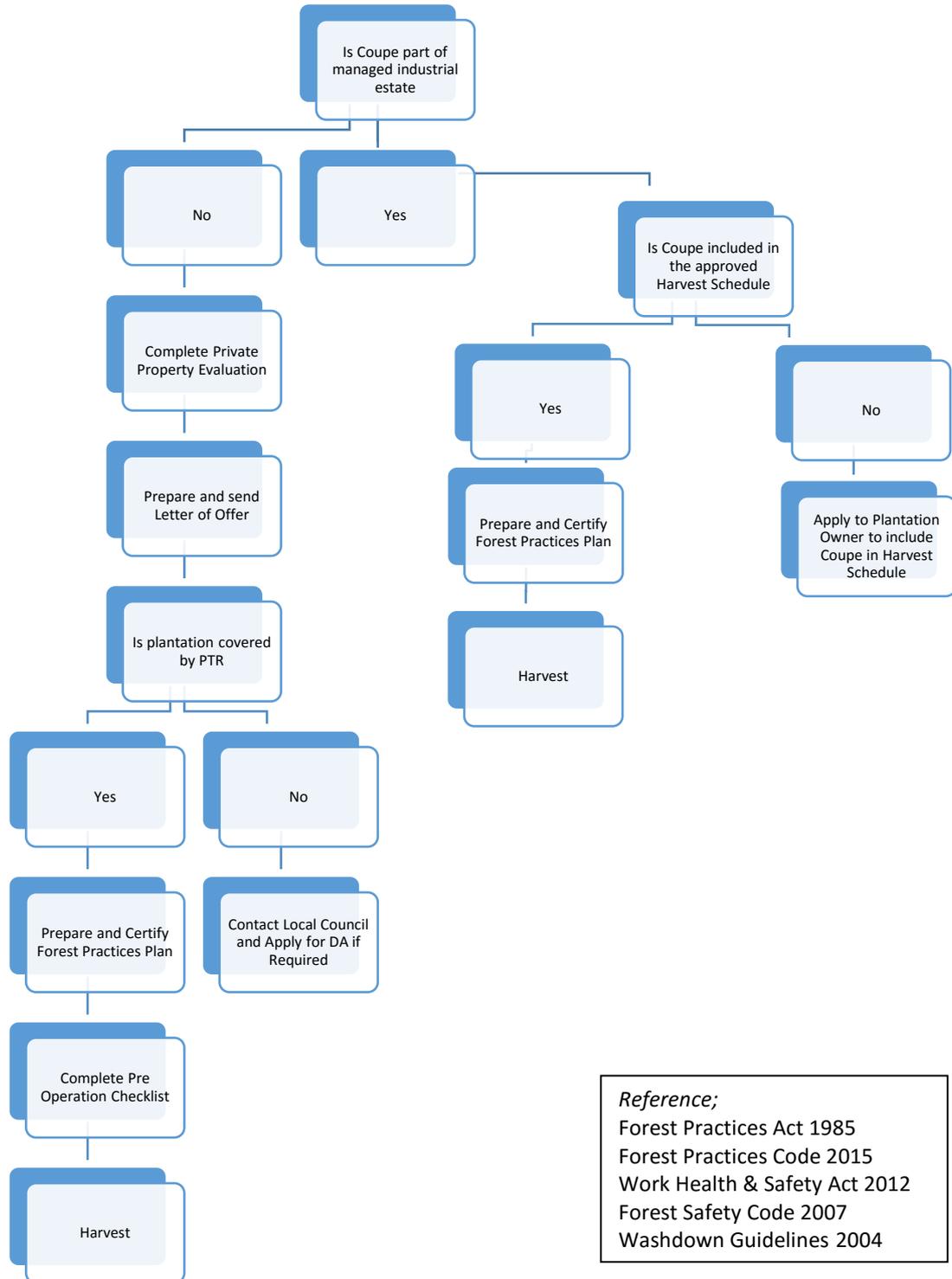
Appendix 1: Planning Process Flowchart – NSW Plantations



Appendix 2: Planning Process Flowchart – NSW Native Forest



Appendix 4: Planning Process Flowchart – Tasmania Native Forest & Plantations



Reference;
 Forest Practices Act 1985
 Forest Practices Code 2015
 Work Health & Safety Act 2012
 Forest Safety Code 2007
 Washdown Guidelines 2004