

Native Vegetation Inquiry
Productivity Commission
LB2 Collins Street East
MELBOURNE
VIC 8003
Fax: (03)9653.2302

Attn: Matt Stubbs [ph(03)9653.2174]

10 February 2004

COMMENT ON PC DRAFT REPORT

IMPACTS OF NATIVE VEGETATION AND BIODIVERSITY REGULATIONS

Thankyou for your invitation to provide comment on the Draft Report for the above Inquiry. On the whole, the TCT has found the Draft Report to be very disappointing. While the TCT's contribution has not been ignored, the juxtaposition of material and ideas makes it quite clear that what government agencies and landholders have to say has been accepted at face value as 'true' such that conflicting material from others without such obvious vested interests to protect has been automatically dismissed as 'untrue'.

It the Productivity Commission's approach is to go no further than to sort material contained in submissions and transcripts of testimonies according to its own ideological preconceptions and prejudices, then this Inquiry is likely to make little contribution to national policy formulation on one of the most important issues of the day. With respect to the situation in Tasmania, in particular, it strikes us as very odd to make no effort to address implementation failure for applicable laws and regulations, despite our having identified this as a major failing of the current regime.

For instance, in your 'conclusions and draft recommendations' chapter, Step 2 contains a suite of laudable motherhood statements, including: "Current regulatory approaches should be amended to comply with good regulatory practice, including: ... provision of accessible and impartial appeals and dispute-resolution mechanisms". Meanwhile, the Tasmania section is riddled with acceptance of the provisions of the Forest Practices Act designed specifically to prevent access to such mechanisms where the logging of native forests is concerned.

Given this patently ridiculous juxtaposition of irreconcilable notions, to cite but one example, the TCT feels that there is little constructive to be done by way of further contribution to the Inquiry beyond urging that the material and suggestions set out in our original submission be given the attention we obviously feel it is worth.

What is most disappointing in the Draft Report is the lack of positive and substantive response to the commitment to collaborative engagement with governments and landholders with a genuine interest in finding appropriate ways to conserve biodiversity while reasonably constraining unsustainable activities and fostering sustainable ones.

We await the arrival of more propitious times.

Yours sincerely,

Michael Lynch
Director