



HIDDEN HOUSING MATERIAL

PLYWOOD SOURCED FROM
FORESTS IN SARAWAK AND
TASMANIA





Hidden Housing Material

Plywood Sourced from forests in Sarawak and Tasmania

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Back cover image: Environmentalist Bob Brown in SU055C
threatened forest in Tarkine. Photo Matthew Newton.



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➤ 1. Introduction



Logging natural forests for plywood products used in construction in Japan has been destroying irreplaceable, high conservation value ecosystems and is also implicated in the theft of indigenous lands and the dispossession of indigenous peoples in Sarawak, Malaysia.

Notorious Sarawak logging companies have also been moving into other locations as the natural forests of Sarawak have been annihilated by runaway logging. One such location is Tasmania, Australia where there is a history of community unrest over unacceptable logging of high conservation value forests in which subsidiaries of Sarawak companies have become entangled.

Previous reports from JATAN and Markets For change published in 2016, 2017 and 2018 extensively outlined the issues and impacts in Sarawak¹. We began an ongoing process of informing companies in Japan's housing industry supply chain, requesting that attention be given to the problematic origins of the plywood products they were using and that they therefore implement procurement policies that would guard against environmental and social abuses in the sourcing location.

Importantly, we have repeatedly requested companies to cease procuring wood from Sarawak because of the intractable, unresolved problems there. We have pointed out that 'greenwashing' and the use of inferior forestry certification schemes are not sufficiently addressing the problems.

Regarding Tasmania, concerns were raised with some Japanese housebuilders and flooring manufacturers by the Huon Valley Environment Centre who delivered a report, Behind the Veneer: Forest Destruction and Ta Ann Tasmania's lies" in 2011 in which they exposed the impacts on high conservation value forests, high levels

of community dissent, and the 'greenwashing' of this product in the market by Sarawak logging company Ta Ann.

This report exposes further the current issues on the ground in Sarawak and Tasmania. It involves a collaboration between JATAN, the Sarawak Dayak Iban Association (SADIA), Bob Brown Foundation (based in Tasmania), and the previous CEO of Markets For Change.

We also continue our assessment of the progress of the supply chain in Japan in improving procurement to address serious social and environmental issues connected with their wood supply, and this with their end product. We again find some incremental improvement by some companies, backsliding by a few, but that a majority remain unwilling to expose their practices to scrutiny at all. Japanese companies in general continue to lag behind their counterparts in the other major consuming blocs of the USA and Europe in making their purchasing practices public and in implementing responsible procurement policies. For Sarawak this has the result of consigning the remaining natural forest treasures to oblivion and continuing to contribute to human suffering.

-
1. Forest converted to oil palm plantation
 2. Operation on steep hillside

➤ 2. Conclusion



COMPANIES

It is a responsibility of **companies in the supply chain** to eliminate wood with problematic origins.



FINANCIERS

It is also a responsibility of **financiers** of such companies to be aware of the issues and to adjust their support accordingly.



CONSUMERS

Consumers should also take an interest in the history and impacts of the product they buy. **Demanding better standards from suppliers and refusing product associated with unacceptable impacts sends a strong message back through the supply chain. It is an effective way to achieve change.**



In Japan, where government import policy and the so-called Clean Wood Act continue to also fall far below those of other jurisdictions on illegal and unsustainable wood, it is up to companies, financiers and the markets to take strong action now whilst efforts continue to be made to effect change to public policy.

➤ 3. Sarawak

Sarawak is land of forest no more no less

By Nicholas Mujah Ason (SADIA)



Only 10 percent of Sarawak land is now covered with pristine tropical trees. (Palm oil Tree is not a tree according to FAO definitions). Despite less trees now standing on land in the forest area in Sarawak, Malaysian timber is still one of the lucrative export commodities. The big 6 of timber companies monopolizing the timber trade in Sarawak are Shin Yang group, Rimbunan Hijau group, KTS group, Samling group, WTK group and BLD group. Japan is still the number one main partner or importer while others are Taiwan, and European countries.

Unfortunately for us the forest land areas within the Sarawak state are also the dwelling areas of the indigenous peoples whose life and spiritual being intermingle and are solely dependent on co-existence with the said forest area land, known as territorial domain. In the local term forest is life and blood; and the forest is their only natural "God" gifted supermarket. Meaning loss of forest is loss of life.

Since the early nineteen-eighties to the present day, the conflicts between the poor under-privileged sector of native peoples against timber-rich owners of companies with political linking to peoples in the corridor of power is still an unresolved subject matter of contentious concern. I quote, It is the battle for sustainable livelihood proclaimed



at the International Universal Charter Human Right charter of the United Nations preamble versus the rights to outright profits.

The politics of Sarawak state carry the norms that politicians (though law is silent) can carry on personal business activities as usual (which is morally discourage/wrong) in it system. Hence timber companies are very likely to be owned by individuals and families who also hold political power.

The world communities and conventions believe and agree that to save this planet world each human being, government, company, corporation, producer, importer and exporter must subscribe to truly sustainability practices. Timber operations in Sarawak lack sustainability practices in many ways. Most of the time their operations encroach into the territorial domain of the indigenous peoples resulting in depriving of rights to cultural, spiritual, and customary legal rights to land and failing to obtain Free, Prior and Informed consent as required under the Un Declaration on the rights of Indigenous Peoples. Timber business or practices in Sarawak very often comes with ,corruption, harassment and intimidation.



Nicholas Mujah Ason

Social and land right Defender | Sarawak, Malaysia

Nicholas Mujah Ason is a Social and land right Defender base in Sarawak Malaysia. He is secretary of Sarawak Dayak Iban Association.

Anap Muput Forest Management Unit

By Matek Geram (SADIA)

Some of the longhouse had been visited during a trip in December 2019 is Rumah Minda Anak Jipon, Rumah Jana and Japing at Anap/ Muput (FMU) Tatau, Bintulu Division.

The Headmen or Community leaders (Tuai Rumah) who are against Shin Yang and Zedtee Plywood Company do not receive any allowances and the certificate as a Headmen or Community leaders from the government. The longhouse also does not received any funds from the government. For example, to repair their longhouse. They also never have any good access road, a clean water supply and electricity to their longhouse.

After Shin Yang and Zedtee Plywood Company received their Provisional Lease (PL) and Title Lands at Anap/Muput (Forest Management Unit), the local community is no longer free to enter their ancestor lands. They are not allowed to enter and to hunt inside their own ancestors land.

Tr. Minda and Tr. Japing refute allegations that they are benefits from two Japanese companies that import logging products from Anap/Muput FMU.

According to them they never benefited from these companies. They did not benefit either from the two Japanese companies from or Shin Yang and Zedtee Plywood Company. That only benefits to the company cronies and somebody else.

Before the Shin Yang and Zedtee Plywood Company apply Provisional Lease (PL) and entered the community ancestors' lands, they never got any permission from the land owners.

Most of them are very worried that their ancestors lands has been encroached. They are especially concerned that their forest has been destroyed by both the companies. Now after the both companies started their activities many things have been changed, especially the weather has become very hot. The animals run away from their forest. The natural forest products have been destroyed.

The community's lives have been destroyed by the both companies in Anap/Muput (FMU) Tatau area.



1. Destroyed communal forest
2. communities using their commons
3. Anap-Muput Forest Management Unit

Note:

The Anap-Muput Forest Management Unit (AM-FMU) covers an area of 83,535 hectares in the Tatau District of Bintulu Division in the state of Sarawak in Malaysia. The FMU operates under the Timber Licence T/4317 issued to Shin Yang Trading Sdn. Bhd. expiring on 03rd March 2024. Zedtee Sdn. Bhd. is the logging contractor of T/4317 and Management Representative of AMF MU



Matek Geram

Indigenous rights activist (SADIA) | Sarawak, Malaysia

Matek Geram is an indigenous rights activist from the Sarawak Dayak Iban Association (SADIA). In his childhood when logging companies & plantation companies came to his village of Kuala Balingian, his family members united closely, struggled bravely, to defend their customary forest successfully. This experience triggered Matek to become a forest activist. Matek is working to defend NCR lands strenuously despite that he has been threatened by logging companies & plantation companies. He had been many times arrested by the police and entered a Lock up.

➤ 4. Tasmania

Summary

This report provides updated information to companies involved in the supply chain of Ta Ann plywood regarding recent events in Tasmania and field assessments in forests affected by current logging practices. Furthermore, it provides information about the proposed entry into Tasmania's forests by the company Shin Yang.

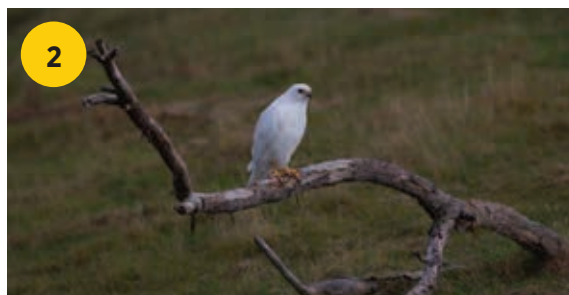
Tasmania's forests supply to Ta Ann remains highly contentious.

Bob Brown Foundation is advocating for an end to native forest logging in Australia. A rapid transition from native forest logging to plantations in Tasmania is possible. An immediate cessation of logging in habitat of the critically endangered Swift Parrot, habitat for all endangered, threatened and rare species habitat, old growth forests, rainforests and world-heritage value forests is possible.

The critically endangered Swift Parrot, endangered Tasmanian Devil, Masked Owl, Wedge-tailed Eagle, and the Grey Goshawk are just a small number of species that are suffering from an unwillingness in Tasmania to protect habitat and adjust land management practices to safeguard the survival of threatened species

Logging of native forests, that contributes to the decline of these species, needs to be stopped to ensure the survival of some of the most unique species on the planet.

There is a choice; logging continues in their habitat and we witness their extinction or Tasmania's native forests are securely protected.



1. Critically endangered Swift Parrot by Elaine McDonald 2. Endangered Grey Goshawk by Andrew Browne

Recommendation



Customers of Ta Ann product who seek a genuinely 'eco-friendly' supply should avoid purchasing wood products derived from Tasmania's native forests.



To avoid the likelihood of receiving contentious timber, request only plantation grown product from Ta Ann Tasmania and Shin Yang, via Petrarch & Sons.



The proposed logging coupes in this report are indicative of the contentious timber supply. These listed proposed logging coupes are only a small snapshot of the logging coupes that are proposed to be logged for Ta Ann Tasmania and don't mean that other logging coupes are ok to receive timber from.



Both Shin Yang and Ta Ann continue to clear important forest for palm oil in Sarawak. These companies, along with other Sarawak logging companies, are too risky to be receiving timber from.

ACRONYMNS

STT	Sustainable Timber Tasmania
FSC	Forest Stewardship Council
FPPF	Future Potential Production Forest
PTPZ	Permanent Timber Production Zone
SPIBA	Swift Parrot Important Breeding Area
FPA	Forest Practices Authority
DPIPWE	Department of Primary Industries, Water and Environment

Critical value of intact native forests



NATIVE FOREST CARBON STORES

The cool temperate natural forests of south-eastern Australia are some of the most carbon dense forests in the world. In the mountain ash (*Eucalyptus regnans*) forest in the Central Highlands of Victoria and Tasmania are found the highest biomass carbon stocks, with an average of more than 1200 tonnes, and maximum of over 2000 tonnes of biomass carbon per hectare².

Natural forests are more resilient to climate change and disturbances than plantations and carbon in natural forests is stored in a more reliable stock than that in industrialized forests which have reduced genetic diversity and structural complexity, and therefore reduced resilience to pests, diseases and changing climatic conditions. The carbon stock of forests subject to commercial logging and of monoculture plantations in particular will always be significantly less on average (~40-60% depending on the intensity of land use) than the carbon stock of natural, undisturbed forests. The rate of carbon fixation by young regenerating stands is high, but this does not compensate for the smaller carbon pool in the younger-aged stands of industrialized forests compared with those of natural forests.

1. Tree in Tarkine forest coupe SU055C, threatened by logging.

2. Tree threatened by logging in Tarkine forest SU055C. Photo by Ted Mead.

The IPCC has made it clear that to constrain global warming to 1.5C it is not only imperative to cut CO2 emissions and maintain terrestrial carbon stores, but to also draw carbon back out of the atmosphere, something that recent studies have shown mature forests to do most effectively³. Further, we have only 10 years left in which to meet goals for 1.5C warming, so actions with immediate results are imperative. In the IPCC's Special Report on Land at paragraph B1.2 they make clear that "examples of response options with immediate impacts include the conservation of high-carbon ecosystems such as peatlands, wetlands, rangelands, mangroves and forests" and at B5.3 that "reducing deforestation and forest degradation lowers GHG emissions".

Therefore, the intact natural forests of Tasmania are best deployed by being protected and allowed to continue to grow undisturbed by logging. When the forest industry collapsed in 2011-2 in Tasmania and logging ceased in over 450,000 hectares it had a dramatic impact on Tasmania's greenhouse gas inventory, with wood production ceasing to contribute to net emissions and instead the forests becoming a net sink. This reversal brought Tasmania down to net zero emissions within a few short years. Ramping up logging as intended by current policy will reverse this trend.

"The IPCC has made it clear that to constrain global warming to 1.5C it is not only imperative to cut CO2 emissions and maintain terrestrial carbon stores, but to also draw carbon back out of the atmosphere, something that recent studies have shown mature forests to do most effectively"





Ta Ann Tasmania

Ta Ann Tasmania (TAT) was established in 2005. They have two veneer mills - the Huon mill built in 2007 and the Smithton mill in 2008 – and in 2015 commissioned a new plywood manufacturing plant in Smithton.

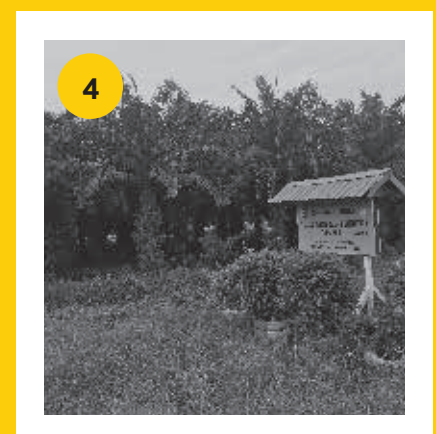
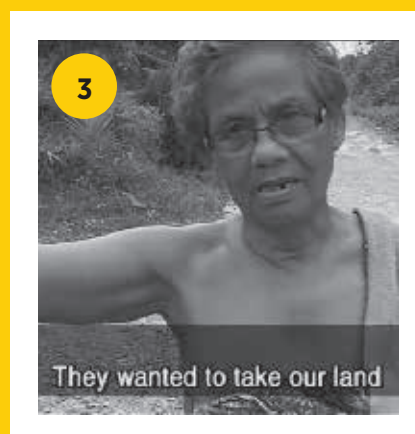
Ta Ann Tasmania is a subsidiary of Ta Ann Holdings Berhad. Ta Ann Tasmania has received \$45 million in public money from the Australian Government since they arrived in Tasmania.

Ta Ann Tasmania exports veneer to Sibu in Sarawak where it is processed into plywood and exported to Japan. In 2018 more than 90% of Ta Ann's exports of plywood was to Japan.

Ta Ann is a controversial timber and palm oil company in Sarawak, responsible for logging of orang-utan habitat and displacing indigenous people.⁴ The notorious reputation of Ta Ann, including environmental impacts in Tasmania and Sarawak, have previously been well documented by environmental organisations in Tasmania.⁵

The wood requirements of Ta Ann Tasmania as the single biggest player are now dictating unsustainably high levels of logging by Sustainable Timber Tasmania, effectively taking on the role formerly played by Gunns Ltd in driving logging volumes. From takayna / Tarkine in the North to Lune River in the South, contentious forests planned for logging are in ancient ecosystems that need protection from logging.

Our organisation has conducted field investigations in a selection of logging areas around Tasmania that have supplied Ta Ann Tasmania or are scheduled to supply the company. The second part of this report outlines our findings about the environmental values of these forests, including adverse impacts on old growth, mature habitat and habitat for rare, threatened and endangered species.



1. Community members in SU055C forest in the Tarkine threatened by logging for Ta Ann.
2. Protest at Ta Ann timber mill in Smithton, Tasmania.
3. Sarawak local appealing land grab by Ta Ann.
4. Ta Ann Pelita Igan Plantation

Shin Yang to Tasmania

In 2018 the newly registered West Australian company Patriarch and Sons revealed its proposed Bell Bay rotary peel veneer mill would process native and plantation wood. They have stated the company will use Eucalyptus nitens and native forest timbers in their Bell Bay rotary peeler veneer (RPV) mill with boards being made in Sarawak, East Malaysia and exported to Japan.⁶

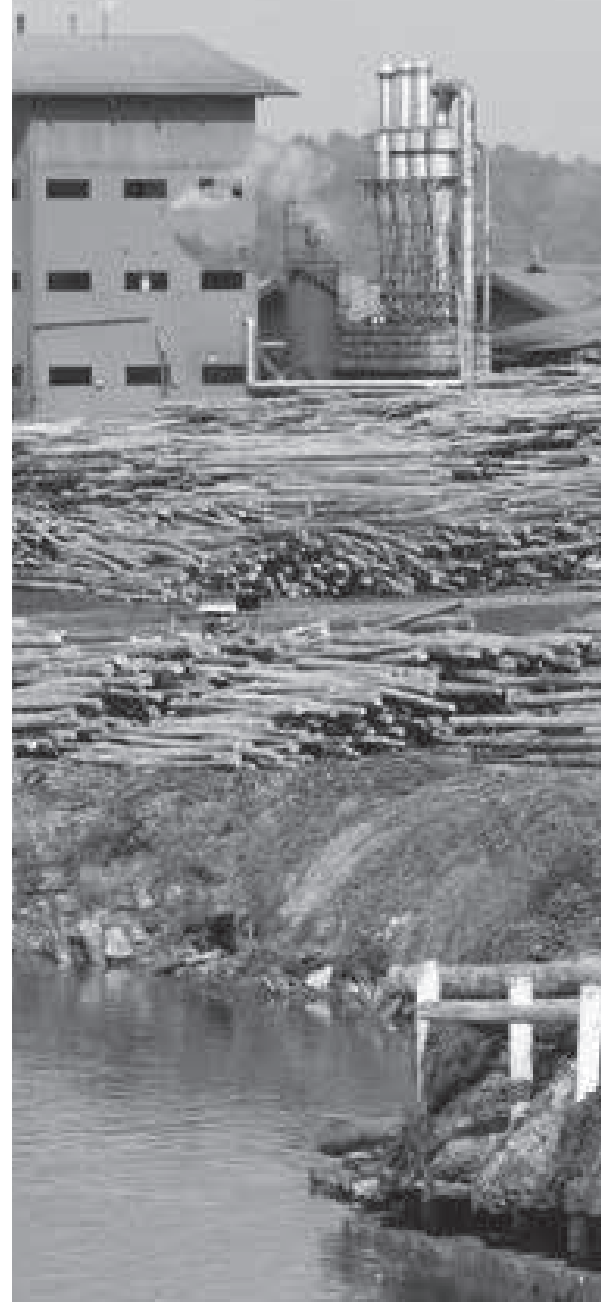
This company, Patriarch & Sons, has direct links to one of Malaysia's worst logging companies, Shin Yang. Shin Yang have been responsible for wholesale destruction of intact rainforests, illegal logging, aggressive palm oil expansion and human rights violations.

The company will be a competitor to Ta Ann Tasmania.

This proposed timber mill at Bell Bay in Tasmania's north spells another Malaysian logging giant setting up to plunder the island's unique native forests. Patriarch and Sons has been established by one of Malaysia's most disreputable logging companies, Shin Yang. We are shocked that Tasmania's unique forests are going to be flattened to feed another atrocious Malaysian logging company. This is the second Sarawak logging giant that has been ushered in to destroy Tasmania's unique native forests, rainforests and wildlife habitat, after Ta Ann has been paid more than \$40 million of taxpayers' money to entrench forest destruction in Tasmania for the past 12 years.

Shin Yang Group hold more than 500,000 hectares of timber concessions in Sarawak.⁷ Amongst other business interests, they are engaged in logging, timber processing and pulp and oil palm plantations.

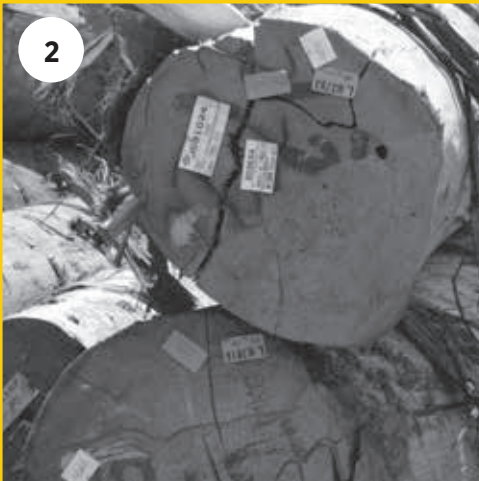
The Shin Yang group is run and owned by the Ling family, whereby Pelita Holdings, an official body controlled by Sarawak's former Chief Minister, now Governor, Abdul Taib Mahmud, holds 26% of its shares. Gerald Rentap Jabu, son of Sarawak's former Deputy Chief Minister Alfred Jabu, is a member of Shin Yang's board of directors. Shin Yang is strongly involved in logging and shipping and is also aggressively venturing into the oil palm sector. The group holds a 30% share in the Malaysian stock exchange listed Sarawak Oil Palms (SOP). In 2009, Shin Yang was strongly criticized by Malaysia's Human Rights Commission SUHAKAM for its dealings with Sarawak's native communities.



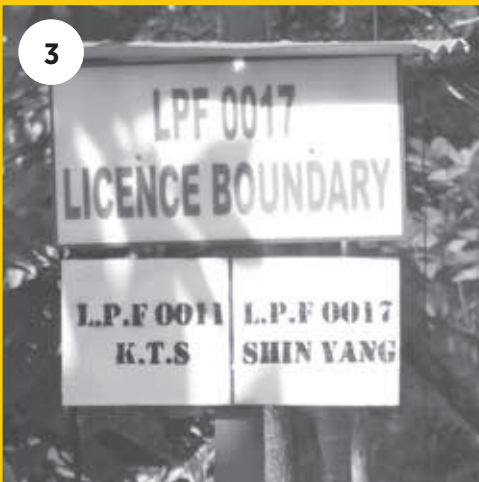
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3



Shin Yang group has aggressively logged and cleared pristine rainforest in the Heart of Borneo, an international biodiversity hotspot proposed by the Malaysian authorities for national park status. This includes instances of illegal logging on steep slopes and along riverbanks.

Local communities and ex-staff of Shin Yang have independently alleged the company hires armed gangsters to intimidate and assault those who voice concerns or act against the company's interests.⁸ In 2009 Shin Yang were investigated by the Human Rights Commission of Malaysia (SUHAKAM).⁹ A statement released in August 2019 by the Timber Industry Employees Union of Sarawak (TIEUS) has accused Sarawak's Shin Yang Group, of violating the rights of its workers.¹⁰

In 2017 the discovery of Shin Yang plywood on the construction site of Tokyo 2020 Olympics was publicised in Japan and internationally as a matter of concern¹¹ as it illustrated the utilisation of tropical plywood of dubious origin and weak sourcing guidelines that did not even require that plywood used on site be legally obtained.

The Headman of Long Jaik, a Penan indigenous village that has been fighting Shin Yang for over 30 years issued this statement in September 2017: "Shin Yang have been logging very aggressively in the area of our village. When their tractors extract a log, they just bulldoze everything around... Shin Yang has been logging our ancestral forests without our permission or consent. They have never asked us for our opinion or needs. [Shin Yang] destroy[s] everything in front of them before they extract logs. That is why our life in Long Jaik now is very difficult." Matu Tugang¹².

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1. Shin Yang Log Pond
 2. Samling Log Pond
 3. Signboard of Tree Plantations (KTS and Shin Yang)



FSC fail twice

Sustainable Timber Tasmania, the supplier of wood to Ta Ann Tasmania, does not hold Forest Stewardship Council (FSC) certification for forest management. They have failed twice now to gain the certification due to problems with their logging practice. All environment groups oppose their application because of a failure to meet high conservation value requirements.

The logging practices carried out by Sustainable Timber Tasmania insufficiently protect vital old growth forest and biodiversity. Clearfelling, cable logging, and annual autumn post-logging high temperature burns are still routine practice of the government business enterprise. Environmental and social problems that go hand in hand with the daily practices of STT mean that if they gain FSC certification, it is the FSC brand that will be sullied.

Flaws that have stood in the way of FSC certification include the failure to engage the public with what is to happen to particular forests in their area via district management plans, failure to properly protect biodiversity because upgrades to the Forest Practices Code prepared by scientists have never been applied as they would constrain wood

production within the forest management zone, old growth forests continually being destroyed and intact forests diminished as STT continues to push roads and logging into remote areas.

STT has failed to assess and monitor rare, threatened and endangered species and has provided inadequate protection of high conservation values. The FSC audit found that STT regularly fails to even identify rare, threatened and endangered species in logging areas, let alone protect them adequately.

Bob Brown Foundation participated in the two FSC audits of Sustainable Timber Tasmania, in 2014 and 2019. Our extensive analysis, including field visits, concluded that STT is not able to conform to the standards the FSC system requires. We submitted evidence to the auditors that there are unique values in the threatened forests of Tasmania. We have provided extensive information and compelling evidence of fundamental failures in the forest management system.

Prospect of going into the promised reserves – future potential production forests



Tasmania's Government is planning to allow logging in vast tracts of native forests that were promised protection in the Tasmanian Forest Agreement. These 356 000 hectares of forest have been off limits to logging since 2014. However, the Tasmanian Forest Agreement did not provide upfront and promised protection for 356 000 hectares. These forests were designated by law for protection as high conservation value forests but that has now been abandoned by government placing them at risk from April 2020.

One hundred thousand hectares of ancient rainforests in takayna / Tarkine, to the unique habitat for the critically endangered Swift Parrot on Bruny Island and in Wielangta.

The Tasmanian Government plans to allow logging in these forests in April 2020. The threatened 356 000 hectares has old-growth, rainforest and other high conservation value forests. With significant areas of threatened species habitat.

In December 2019 Right to Information (RTI) documents revealed that Tasmania's logging industry has been planning with the Government to log these 356 000 hectare forests with independently verified high conservation values.

Revelations show that one proposal is to destroy one conservation value in Tasmania's unique forests while saving another one raises alarm with conservationists. Loggers have mooted a plan for Swift parrot habitat on Bruny Island currently in the permanent logging zone be exchanged for forest elsewhere on mainland Tasmania

for logging. This is not a strategy to save the Swift Parrot. All breeding and foraging habitat for the Swift Parrot needs urgent protection from logging and protecting the Bruny Island forests will not be enough.

Tasmania's takayna / Tarkine has also been targeted by the logging industry in their latest collusion with the government. This RTI reveals that as a 'matter of urgency, the loggers want to ensure they can log the Tarkine forever.'

Although Forest Industry Association Tasmania claim that there is a looming shortfall in sawlog supply, these claims are not supported by the facts revealed in official documents.

The two vital points are first that actual supply of sawlog has been running below the legislated minimum for the past few years and no-one has been complaining of a shortfall, so the issue seems confected by FIAT.

Secondly, the sustainable yield tables of Sustainable Timbers Tasmania show a continued high-quality sawlog supply as the available resource shifts from native forest to plantation timber. Yet FIAT claims that there is a supply gap, obviously hoping that the Minister will not read the report they referred to, which clearly shows their claim to be wrong.

The upcoming drop-in native forest logs have long been known and result from previous overcutting of the forests, yet the long-awaited transition to a non-controversial plantation supply is finally coming.

The industry agreed to this plantation transition on numerous occasions over past years, but now they want to trash precious forests they earlier acknowledged should become reserves instead of getting into the modern age of plantation grown timber.¹³

1. Logging area in old growth forests, Tasmania. Photo by Paul Kimbell.

2. Forests in the Tarkine that are Future Potential Production Forests and threatened by logging in April 2020.

Field Investigation of scheduled logging coupes in Tasmania



FAUNA HABITAT

Tasmania has a rich, rare and important fauna population. All species, both flora and fauna, rely on each other in a complex web of relationships. If any species are lost, the whole system is affected. Globally, we are facing an unprecedented decline in nature and accelerating mass extinction¹⁴ and Australia has one of the worst recent extinction records of any continent. More than 300 animal and 1000 plant species are now considered threatened with imminent extinction.

The Tasmanian Government's published Tasmania's Threatened Fauna Handbook in 1999 and twenty years later they are responsible for the ongoing decline of native species they are supposed to be protecting. The significance of Tasmania's fauna described in the book remains the same, if not more important to preserve and conserve due to the further loss of undisturbed land, onset of the climate emergency, increased threats and ongoing decline of species.

Tasmania's fauna have received national and international recognition for their uniqueness. The variety of forms reflects Tasmania's diversity of habitats and topography, over 10 000 years of island separation, and our Gondwanan origins. Tasmania has a large complement of endemic species ranging from the Tasmanian devil, native hen and mountain skink to the giant velvet worm and burrowing crayfish; all of which are important elements in our national and global biodiversity. The State's comparatively large tracts of undisturbed land and the absence of exotic predators like the European fox and stoat has meant that many species now extinct or under threat on mainland Australia continue to survive and flourish in relative abundance. For example, the eastern quoll and Tasmanian bettong are now extinct on the mainland while the spotted-tail quoll, eastern barred bandicoot and ground parrot retain a stronghold in this State.

Despite Tasmania's extensive national park and reserved land system our State is no different to other parts of Australia in having a long list of species declining due to human impact and other threatening activities. Ongoing clearance, degradation and conversion of native vegetation are recognised as major threats to the long-term survival of many of our unique and common animal species.¹⁵

Sustainable Timber Tasmania are logging areas that contain significant concentrations of rare and threatened species, including critically endangered Swift Parrot, and areas that contain habitat critical to the survival and long-term viability of these species.

In our report we will address a small number of fauna species having their habitat logged by Sustainable Timber Tasmania. These include the critically endangered Swift Parrot, endangered Tasmanian Devil, Spotted-tailed Quoll, Masked Owl and the threatened Giant Freshwater Crayfish. There are intact forests on the logging schedule until June 2022 that are habitat for these and other endangered species. Ta Ann Tasmania has received timber from forests that

are critical habitat for these species and have been logged, or they are scheduled to receive timber from critical habitat that is on the three-year wood production plan or in the permanent timber production zone land.

1. RD005C an area logged in Tasmania's Tarkine where timber was supplied to Ta Ann Tasmania.
2. Swift Parrot habitat logged in southern forests of Tasmania for Ta Ann Tasmania.
3. Logging in Tarkine forest for Ta Ann Tasmania.
4. Swift Parrot habitat logged in southern Tasmania for Ta Ann Tasmania.

SWIFT PARROT

28 January 2020

To whom it may concern,

I have been delivering conservation focused scientific research on the Critically Endangered Swift Parrot for over 15 years, working for the Tasmanian government and the Australian National University. The conservation actions required to prevent the extinction of the Swift Parrot have become very clear over this period as our knowledge of the bird's spatial ecology, breeding biology and threatening processes continued on a very steep learning curve. Halting the loss of Swift Parrot breeding habitat in Tasmania, the only place on earth they reproduce, is clearly fundamental to preventing their extinction. However, despite now having a wealth of information on where and what forests are in need of immediate protection, the Tasmanian government continues to routinely thwart the application of evidence-based conservation advice, prescriptions and management plans that were developed to prevent the logging of breeding habitat. Unfortunately, this includes approving logging proposals that have been previously rejected within the Tasmanian government's own assessment processes – and were rejected because these forests are recognised as crucial to the survival of the Swift Parrot.

The dire situation for the Swift Parrot has only escalated over the years. However, it appears that the power relationships inside the bureaucracy have simply overturned many critical advances in conservation management for the species and is done without any scientific basis.

Regards

Dr Matt Webb



All potential nesting and foraging habitat for the Critically Endangered Swift Parrot is habitat that is critical to the survival of the species.

A large body of evidence has clearly demonstrated Sustainable Timber Tasmania management of Swift Parrot habitat is directly resulting in a loss of critical habitat and contributing to Swift Parrot decline. Logging in documented high-quality Swift Parrot habitat has continued against the advice of scientific experts provided to the Tasmanian Government.

The Swift Parrot (*Lathamus discolor*) is listed as Critically Endangered and faces a high risk of extinction in the wild.¹⁶ The Swift Parrot is an obligate migrant breeding only in Tasmania¹⁷.

It is estimated that less than 2,000 birds remain in the wild¹⁸. Breeding success of Swift Parrots depends on the availability of both suitable foraging and breeding habitat.¹⁹ ²⁰ The specific location of breeding habitat changes each year depending on the configuration of Eucalyptus flowering.²¹ Flowering trees create foraging habitat, but to breed successfully, Swift Parrots must find flowering trees in close proximity (within 10kms)²² to suitable breeding habitat (i.e. hollow bearing forest).

Native forest logging has been identified as a major threatening process for Swift Parrots because it removes and reduces land cover of both nesting and foraging habitat²³. Management of Swift Parrot habitat is highly contentious²⁴.

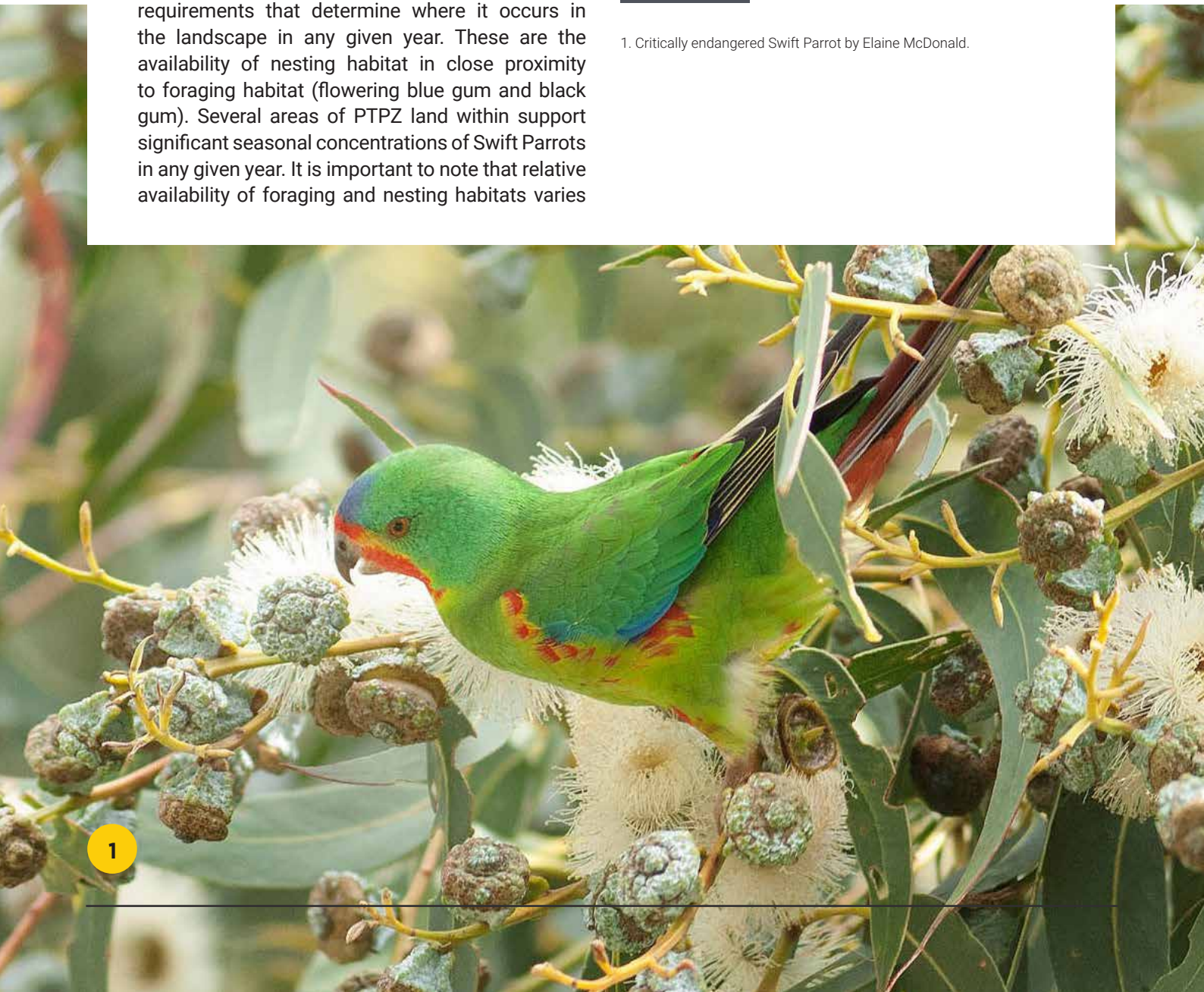
The Critically Endangered status of the Swift Parrot makes any suitable habitat (foraging habitat in close enough proximity to nesting habitat) critical to the survival and long-term viability of the species. Given the Swift Parrot is Critically Endangered and faces a 50% chance of extinction in the immediate future, any forest that is used by the species is an area that contains a significant concentration.

The Swift Parrot has particularly specific habitat requirements that determine where it occurs in the landscape in any given year. These are the availability of nesting habitat in close proximity to foraging habitat (flowering blue gum and black gum). Several areas of PTPZ land within support significant seasonal concentrations of Swift Parrots in any given year. It is important to note that relative availability of foraging and nesting habitats varies

each year depending on flowering patterns and conditions. In many years in areas where flowering conditions are optimal and nesting habitat is present, all available habitat is occupied.²⁵

Predation by invasive Sugar Gliders (*Petaurus breviceps*) has recently been identified as a major threatening process for Swift Parrots in their Tasmanian breeding range.²⁶ The rate of Sugar Glider predation on nests decreases with increased mature forest²⁷. Intact, undisturbed and continuous forest cover reduces the risk of glider predation on Swift Parrot nests²⁸.

1. Critically endangered Swift Parrot by Elaine McDonald.



POLICY FAILURE AND CONSERVATION PARALYSIS FOR THE CRITICALLY ENDANGERED SWIFT PARROT

In 2013 Allchin et al. highlighted counterproductive regulatory performance in the management of Swift Parrot habitat and a 'deep-seated reluctance, at all levels of government, to prevent habitat loss, even when there are obvious alternatives to destroying it.'²⁹

In 2018 Webb et al. published the paper 'Policy failure and conservation paralysis for the Critically Endangered Swift Parrot' summarising the policy and management failings that allow Swift Parrot breeding habitat to continue to be logged in the context of extensive evidence that the cessation of logging in Swift Parrot breeding habitat in Tasmania is urgently required to secure the species.³⁰

Failures to protect Swift Parrot breeding habitat in approved logging operations have been repeatedly exposed by public access to documents outlining decision-making processes (e.g. Blakers and Crawford 2008; Blakers 2009; Pullinger 2015). The information in these reports show that expert advice is routinely ignored, and that known breeding habitat and nest trees are knowingly logged.³¹ The first application for Forest Stewardship Council certification (Forestry Tasmania 2014a, 2014b) largely ignored Swift Parrot management. In over 250 pages of the application, the words 'Swift Parrot' appeared only three times (in tables) without any details of future management intentions, and the Threatened Fauna Advisor was not mentioned at all. The lack of adequate swift parrot management was a major reason for Forestry Tasmania's failure to achieve certification (Forestry Tasmania, January 2017).³²

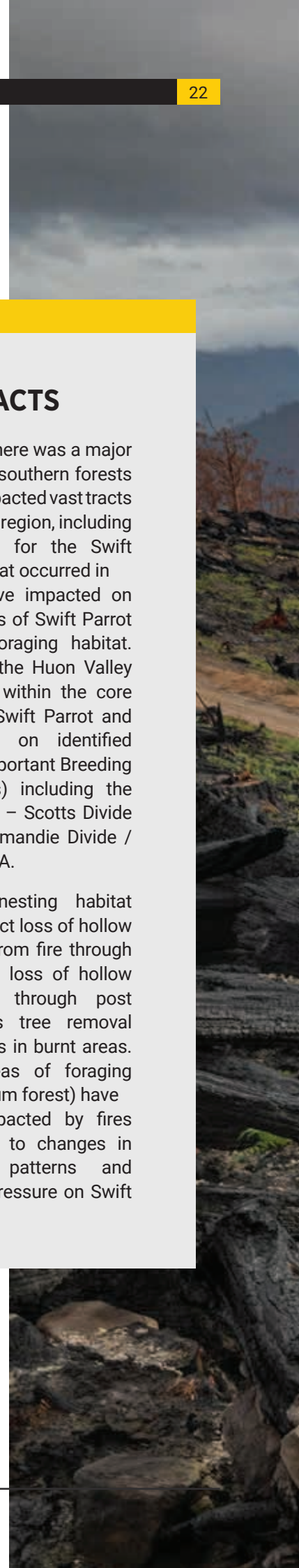
In 2017 more RTI documents were released to Tasmanian Conservation Trust and Bob Brown Foundation. The documents again highlighted logging in important swift parrot habitat was occurring against the advice of leading experts. Threatened Fauna Advisor recommendations could not be met in a number of logging coupes without impacting on STT wood supply. The FPA asked leading Swift Parrot expert Matt Webb for an expert opinion with regard to swift parrot and logging in a number of coupes. Webb's advice was unequivocal that nesting and foraging habitat would be lost to logging and recommended logging not take place. Logging went ahead in 2017 after DPIPW granted a special approval despite STT's inability to meet the Threatened Fauna Adviser prescriptions³³.

FIRE IMPACTS

In early 2019, there was a major bushfire in the southern forests that directly impacted vast tracts of the southern region, including critical habitat for the Swift Parrot. Fires that occurred in early 2019 have impacted on important areas of Swift Parrot nesting and foraging habitat. The extent of the Huon Valley fire is entirely within the core range for the Swift Parrot and has impacted on identified Swift Parrot Important Breeding Areas (SPIBAs) including the Leithbridge Hill – Scotts Divide SPIBA and Kermadie Divide / Storm Hill SPIBA.

Impacts on nesting habitat range from direct loss of hollow bearing trees from fire through to indirect loss of hollow bearing trees through post fire dangerous tree removal along roadsides in burnt areas. Significant areas of foraging habitat (blue gum forest) have also been impacted by fires which may lead to changes in flowering patterns and place further pressure on Swift Parrots.

BB025A area logged in southern Tasmania with Swift Parrot habitat destroyed. Photo by Dan Broun.







CRITICAL SWIFT PARROT HABITAT LOGGED FOR TA ANN TASMANIA



Southport S0034A An important monitoring site utilised by Swift Parrot researchers at Tyler's Hill in the southern forests was logged in 2017.



HP010C. Logged in 2016, even after specialist scientific advice requested by the Forest Practices Authority described the forest as 'an outstanding example of remaining habitat for the species...(the coupe) contains important breeding habitat with high density blue gum foraging habitat and numerous nesting sites.³⁴ This advice was ignored.

The Tasmanian Government have been advised by Swift Parrot experts that the southern forest regions of Barnback and Denison areas be recognised as a Swift Parrot Important Breeding Area (SPIBA).



BB025A Barnback coupe BB025A contained high quality Swift Parrot nesting and foraging habitat. Cable logging was undertaken in 2015 in a section of the coupe, followed by ground-based clearfelling in 2018 when the majority of the coupe was cleared. BB025A contained high quality foraging habitat for Swift Parrot. All mapped *Eucalyptus globulus* forest within the boundaries of BB025A has been cleared. It is highly likely this forest was providing high quality nesting and foraging habitat for Swift Parrots. A Swift Parrot nesting record was present in the coupe. This known nesting site was excluded from the coupe with a 50m buffer. However, during the 2019 bushfires this tree was burnt. It appears the entire coupe once supported large old hollow bearing trees and was high quality swift parrot breeding habitat.



DN007C. Logged in 2019, the forest has very large old growth trees, some that are over 4m in diameter and are likely to over 500 years old have been logged. The coupe is adjacent to DN07B. Swift Parrot experts have provided advice about this coupe to DPIPW that very clearly says it is high quality Swift Parrot habitat and logging will have serious impacts on SP habitat. The forest in DN07C that is being logged now is of similar habitat value but it appears they logged it without seeking any advice. The DN07C coupe is about 1km from the tallest blue gum on earth. This blue gum is was flowering along with the most of blue gum in the southern forests and Swift Parrots are currently there feeding and nesting when the logging was occurring in DN07C coupe.





CRITICAL SWIFT PARROT HABITAT THREATENED BY LOGGING FOR TA ANN TASMANIA

Desktop analysis of Swift Parrot nesting records from the Tasmanian Government’s biodiversity database, the Natural Values Atlas, and Sustainable Timber Tasmania Three-year wood production plan 2019/20 to 2021/22, has identified a number of threatened coupes in the southern forests and north-east forests of Tasmania that will directly impact critical Swift Parrot habitat, including known Swift Parrot nesting sites and foraging habitat.

Twenty-nine coupes are listed here. They are only a small snapshot of the areas threatened in Tasmania that will directly impact the Swift Parrot if logged. This list of coupes is based on available data and while indicative, they are conservative and underestimate what is being lost or threatened.

Coupes that will directly impact the Swift Parrot if logged

EP003G	EP073A	EP078D	FN001F	FN005C
FN027D	HP016D	HP023F	HP029A	HP029E
HP031I	HP032A	KD026C	KD040I	LU001C
LU017E	MA106A	MA106B	MA106C	MA111A
MA114L	MA121E	S0005D	S0019E	S0020C
S0043F	S0048G	S0049A	DN009G	

1. DN007C Old growth forest logged in southern Tasmania. Peeler was supplied to Ta Ann Tasmania. Photo by Southern Forest Alliance.



HP010C

S0034A

1

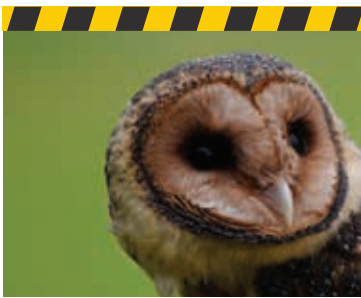


MASKED OWL

The Tasmanian Masked Owl (*Tyto novaehollandiae castanops*) is listed as Vulnerable to Extinction under the federal EPBC Act, however the Australian Government has not released a recovery plan or a threat abatement plan.

The Masked Owl is a hollow dependent species requiring large hollows in Eucalyptus trees more than 100 years old for breeding.

STT's management for Masked Owl lacks a precautionary approach as there are no adequate systems in place to routinely identify and protect habitat, such as pre-logging searches for nest and roost sites in coupes falling within the core range of the species.



MASKED OWL HABITAT LOGGED FOR TA ANN TASMANIA

LU040F. Logged 2019. A Masked Owl was recorded within coupe LU040F in November 2016. The sighting was reported to STT and the FPA by a member of the community who carried out a call playback survey, which involves broadcasting the call of the Masked Owl through a megaphone to illicit a response from any Masked Owls that may be present in the area. The survey report provided to STT and the FPA reported that a Masked Owl was observed within three minutes of the commencement of the call playback broadcast commencing. This suggests the Masked Owl observed within LU040F was using this area of forest and was close to the survey location prior to the commencement of the call playback. This indicates that Masked owl roosts or nests could be present with LU040F.

MASKED OWL HABITAT THREATENED BY LOGGING FOR TA ANN TASMANIA

One example of a Masked Owl habitat in Tasmania's forests is below. There are many areas of forest that are core habitat for the Masked Owl in the permanent timber production zone land.

FR026A In the Frankland River region of takayna / Tarkine is a 60 hectare coupe on the proposed logging schedule. It is an area of forest with old growth forest, high conservation values and high quality *Astacopsis* gouldi habitat. In November 2019, during the annual Tarkine BioBlitz, an endangered Masked Owl was identified in this logging coupe. A call playback survey was carried out, and the Masked Owl was observed in less than three minutes of the commencement of the call suggesting the owl was using this area of forest. This indicates that Masked Owl roosts or nests could be present with FR026A.



ASTACOPSIS GOULDI

Found only in the northern rivers of Tasmania, the Tasmanian Giant Freshwater Crayfish (*Astacopsis gouldi*) is the largest freshwater invertebrate in the world.

Living since the dinosaurs, it has seen massive population declines and localised extinctions by logging, mining, sedimentation of rivers and illegal poaching. Continued logging of its habitat has led to smnted populations, confined to a very limited geographical areas.

Astacopsis gouldi is endangered under IUCN guidelines and vulnerable under Federal Environment legislation.³⁵

Despite 20 years of robust scientific evidence of the species decline, none of the recommended secure reserves have been established. There are currently no significant areas of crayfish habitat that are protected to the headwaters and no significant crayfish reserves. 75% of its original habitat is degraded and there are numerous localised extinctions. Permanent logging zones exist in 17 of the 22 catchments where the species occurs or is likely to occur.

Todd Walsh is the world leading expert on the giant freshwater crayfish and estimates that crayfish numbers are less than 20% of pre-colonisation numbers.

Sediment after logging is a problem for juvenile crayfish because they live under rocks and logs in shallow sections of creeks for up to seven years, until they are large enough to fend for themselves in deeper water. Sediment fills in their habitat, covering their shelter, eliminating much of their food source and exposing them to predators.

Mr Walsh says if 30 000 hectares of bush was protected from logging and loss of riverside habitat it would secure the future survival of *Astacopsis gouldi*.

Mr Walsh has provided a summary of coupes that are critical to *Astacopsis gouldi*. These coupes are in areas in the north-west and north-east regions of Tasmania. Identified as habitat for the species with either streams inside the coupes or logging will cause potential downstream impacts.

If logged, Ta Ann Tasmania will be receiving timber from these coupes that are critical for *Astacopsis gouldi*. As in the case for the other species in this report, these coupes are indicative of the contentious wood supply

out of Tasmania's native forests that directly impact the survival of threatened species.

⚠ Four coupes have streams inside the coupe

CH017B	FR002A	NA023C	SR065C
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⚠ Forty-one native forest coupes have potential downstream impacts if logged

CF023C	CF044C	CH001C	CH025A	CH027B
DE032D	DP027A	DP032C	DP035A	EM008B
FR017D	FR026A	GC083D	HL033C	IR029A
IR029B	KA007C	KA008D	LG015D	LW003C
LW005C	LW012A	MB008C	MB023B	ME001B
ME008B	MO111A	NA019D	NA021C	NA023C
NH016C	RD001C	RD002C	RD016B	SF164A
SR039C	SR065C	TP002D	TP026E	TP033E
TP035A				

Some coupes are listed as contingency and therefore the data is not available as to whether the timber out of these logged areas will supply Ta Ann Tasmania. There are nine of these coupes that are identified as areas that if logged will have potential downstream impacts on *Astacopsis gouldi*. Therefore, the precautionary principle should be applied and avoidance of timber from these coupes should also be ensured.

⚠ Avoidance of timber from these coupes should also be ensured

CH017B	FR024B	FR041A
FR041B	GC103C	LW004D
LW004D	TP033C	TP041G





TASMANIAN DEVIL

The Tasmanian Devil (*Sarcophilus harrisii*) is a carnivorous marsupial in the Dasyuridae family. Since the late 1990s, the devil facial tumour disease (DFTD) has drastically reduced the devil population and now threatens the survival of the species, which in 2008 was declared to be endangered under the EPBC Act (*Environment Protection and Biodiversity Conservation Act 1999*) and the IUCN's Red List (**The International Union for Conservation of Nature's Red List of Threatened Species**).

Dr Colette Harmsen (BVSc), previously a Field Veterinary Officer with the Save the Tasmanian Devil Program (STDP), is concerned that logging devil habitat is impacting on the remaining surviving Tasmanian Devils, whose major threat is the devil facial tumour disease (DFTD). She says that anything that adds to the breeding pressure on remaining Tasmanian Devils must be taken seriously as a genuine threat to populations of devils.

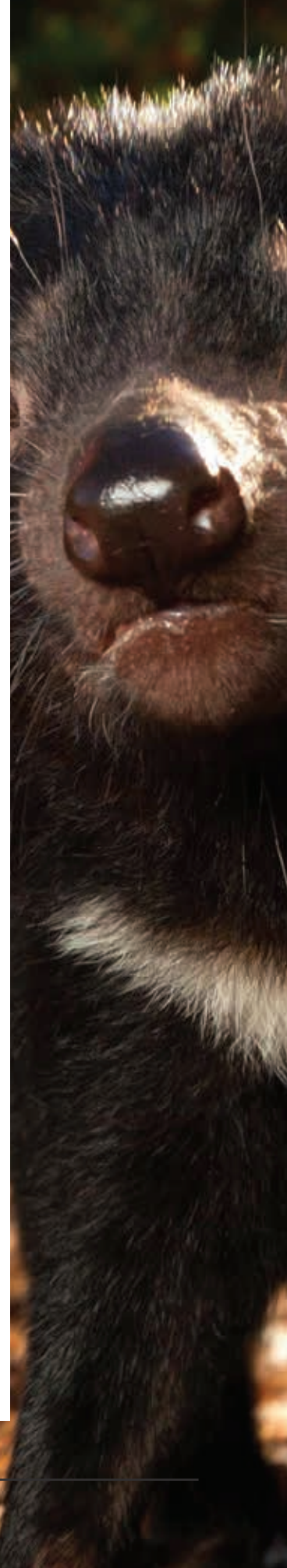
Populations of Tasmanian Devils in the Tarkine region (the North West) of Tasmania have been the last to be affected by DFTD and in many regions of the Tarkine, devil population dynamics remain relatively intact. Tasmanian Devils can travel up to 20km in one evening scavenging for food. They travel through a variety of landscapes and have been photographed in many proposed logging coupes. Tasmanian devils sleep during the day in dens and can rotate through as many as six dens in different locations. Finding an empty devil den does not preclude that den as a devil's future potential den site.

Under section 36 of the Federal legislation, the Environment Protection and Biodiversity Conservation (EPBC) Act, forestry operations undertaken in accordance with Regional Forest Agreements (RFAs) are exempt from Part 3 of the EPBC Act, in this case the provisions relating to listed threatened species. However, Sustainable Timber Tasmania is required to have operational procedures in place to protect and manage listed threatened species on forestry managed land as part of the Tasmanian Regional Forest Agreement.

Dr Harmsen says she has requested a copy of the operational procedures for Tasmanian Devils from Sustainable Timber Tasmania but has not been sent the procedures. The EPBC Act Policy Statement for Tasmanian devils also says that the EPBC Act requires that recovery plans be developed for listed threatened species. There is a draft recovery plan for the Tasmanian Devil from 2010 but no adopted or finalised recovery plan. The Federal Government Environment website states that there is no adopted or made Recovery Plan for this species. It also states that no threat abatement plan has been identified as being relevant for this species.³⁷

Dr Harmsen is concerned that without prescriptions or procedures in place, and with the forest industry's exemptions from the EPBC Act, there is very little protection offered to endangered species within logging coupes. Tasmanian Devil dens are currently not recognised as protected areas that need safeguarding from logging.

Field surveys of forests threatened by logging for Ta Ann Tasmania have recorded the Tasmanian Devil. There are proposed logging areas for Ta Ann Tasmania in the takayna / Tarkine that are detailed further in this report.





OLD GROWTH FORESTS

Sustainable Timber Tasmania are logging old growth forests. Old growth logging is destroying rapidly vanishing ecological and carbon values that our planet cannot afford to lose. STT's own material states that within their permanent logging zones there are 34 000 hectares of old growth forest set aside for logging. In areas in southern, western and north western Tasmania areas with globally rare old growth ecosystems are being lost.

TN065A. Logged in 2018 and burnt April/May 2019 with controversial 'regeneration' burns. This forest contained rare old growth forests, many very large old growth stumps were observed in large clearfelled areas.

WENTWORTH HILLS

Wentworth Hills region in western Tasmania is mostly verified High Conservation Value forests. The area is predominantly vegetated with native forest dominated by Gum-topped Stringybark (*Eucalyptus delegatensis*), frequently with a sub canopy of rainforest trees, reflecting the high rainfall of the region. Twenty-two native forest logging coupes are on the current three-year logging plan in the Wentworth Hills region, sixteen are targeted for supply to Ta Ann Tasmania.

In Wentworth Hills, 11 340 hectares of mapped high conservation value forest on PTPZ land should be securely protected from logging in a National Park.



Coupes in Wentworth Hills that should be protected from logging in a National Park

WW001C	WW005D	WW017B	WW020F
WW032D	WW034C	WW034E	WW035A
WW036B	WW036C	WW038B	WW039A
WW042B	WW042C	WW049	WW050B

1. Endangered Tasmanian Devil photographed in SU055C, threatened logging coupe in Tarkine.
2. WW017B Old growth logging area in Wentworth Hills. Timber from this logging coupe was supplied to Ta Ann Tasmania.
3. WW017B Old growth logging area in Wentworth Hills. Timber from this logging coupe was supplied to Ta Ann Tasmania.

TARKINE

Tasmania's takayna / Tarkine is a key part of the island's wilderness, Australia's largest temperate rainforest is at the heart of this last great wild place. One of the last wild places on Earth, takayna is a critical stronghold for endemic, rare and endangered species.

Logging in takayna continues to destroy intact rainforests and tall eucalyptus forests, crucial habitat for endangered, rare and endemic wildlife. Timber sourced from the contentious takayna logging is sent to Ta Ann Tasmania. 30 000 hectares of takayna is in permanent logging zones. A further 100 000 hectares is in Future Potential Production Zone land. Controversially, there are 28 regional reserves and conservation areas that had their protected status from logging weakened in 2014 by the Tasmanian Government and now are also available for logging.

All timber coming from logging areas in takayna / Tarkine are highly contentious. In Hobart in the last two years, thousands of people have turned out at protests, rallies and marches calling for protection of takayna.

Globally, temperate rainforests and tall eucalyptus forests are becoming increasingly rare and threatened by logging and other human activities.

The threatened forests of takayna that are available for logging have had their World Heritage values independently verified by experts. The Tasmanian Wilderness World Heritage Area is one of only two World Heritage sites on Earth to fulfil seven of UNESCO's ten criteria for Outstanding Universal Values. For each of the seven relevant criteria for Outstanding Universal Value, there are qualifying features in takayna that are unprotected. These globally significant values include flora fossil sites that are considered internationally significant for research on climate and the history of vegetation. It has some of the best-preserved plant

fossil sites in the world dating back 65 million years.

The Australian Heritage Council found takayna to be of outstanding National Heritage significance. The Council found that the rainforests are important for their flora, which has links to the ancient continent Gondwana, and their lichens and fossils, which help tell the story of Australia's ancient flora and its evolution. Many plants found in takayna are Gondwanan species, including the myrtle, leatherwood and celery-top pine.

The two areas of greatest extent where cool temperate forests survive on the Australian tectonic plate are in the wet-highland regions of New Guinea and the wet mountains of western Tasmania, including the Tarkine³⁸.

The second largest tract in the world of cool temperate rainforest occur in takayna³⁹. The largest wilderness dominated by rainforest in Australia is located in takayna, with the most extensive and least fragmented areas of cool temperate rainforest in the country. Rainforest wilderness is extremely rare and comprises only a small percentage of all Australian wilderness. Magnificent tall eucalypts are also a feature of takayna, often intimately missed with the temperate rainforest, a constant reminder of the dynamic interplay between these two great ecosystems.

The threatened forests of takayna are critical habitat for the endangered Tasmanian Devil and a global stronghold for the Spotted-tailed Quoll. *Astacopsis gouldi*, the world's largest freshwater crayfish is found only in northern Tasmania, with the rivers of northern takayna providing a vital stronghold for this threatened giant. These incredible creatures have lived in takayna since the age of dinosaurs but now face major habitat loss, poaching and siltation of their river habitat from logging. recent molecular analysis strengthens the importance of Tasmania's freshwater crayfish as an outstanding example of evolution in a Gondwanan group (Richardson et al. 2006)⁴⁰.

There are sixteen species found nowhere else on Earth and fifty rare and endangered species of flora and fauna found in takayna / Tarkine. Eleven of Tasmania's twelve endemic birds live in the Tarkine. Tasmania's largest diurnal raptors are the Tasmanian subspecies of the Wedge-tailed Eagle (*Aquila audax fleayi*) (listed as

endangered under EPBC) and the White-bellied Sea-eagle (*Haliaeetus leucogaster*) (listed as migratory under CAMBA). The largest nocturnal predator is the Masked Owl (*Tyto novaehollandiae castanops*). The Tasmania population is listed under the EPBC as 'vulnerable'. The Tarkine provides significant habitat for some fifteen to twenty pairs of the Wedge-tailed Eagle and six pairs of White-bellied Sea-eagle and the Grey Goshawk as well as habitat for the masked owl.⁴¹

Bob Brown Foundation has conducted annual BioBlitz studies in takayna / Tarkine since 2015. We have recorded many species of animals, plants and fungi in the threatened takayna forests. The diversity of species found shows a complex natural forest ecosystem at each location. Many large old growth trees create an environment suitable for shade and moisture loving smaller plants, such as the Gunns tree orchid, ferns and numerous species of bryophytes (mosses and liverworts). For example, around 100 bryophyte species have been recorded in our studies of threatened forests

in takayna, highlighting the often overlooked biodiversity of the wet forests. Our studies have found threatened species including the Tasmanian devil, Swift Parrot and Masked Owl inhabiting these forests.

1. Threatened forest in Tarkine, coupe B0092C, site of protests Feb 2020.
2. Aerial activist climbing a threatened tree in threatened forest in Tarkine, coupe B0092C, site of protests Feb 2020. Photo Tim Cooper.
3. Protest platform in tree above coupe B0092C in Tarkine. Feb 2020. Photo Tim Cooper.



1



2



3

CASE STUDIES

SU055C - The Sumac is in the northern region of takayna / Tarkine, located just south of the Arthur River. Significant tracts of old growth rainforest and tall eucalyptus forests are inside the permanent timber production zone and contiguous with the Sumac Regional Reserve. These threatened forests are located a very short distance south west of the popular and iconic Sumac Lookout overlooking the Arthur River. This lookout is promoted by the Tasmanian government to visitors to Tasmania.

Plans by Sustainable Timber Tasmania - The new three-year plan released in July 2019 shows that the 0.8km road is planned to be built into the Sumac coupe SU055C is a contingency coupe. Timber to be sourced from the logged area - 1100 sawlogs. 100 tonnes peeler to Ta Ann. 5100 tonnes of woodchips.

Values of the forests – All the coupe is mapped as oldgrowth during the RFA. Encompasses one of the Tarkine’s few remaining stands of tall eucalypts over 300+ years old.



Large myrtle stands among the forest. Our Foundation has recorded endangered Tasmanian Devils and Spotted-tailed Quolls in the proposed logging area. An integral part of the Sumac catchment forest ecosystem, extending southward into core rainforest of the Tarkine. Oldgrowth forests generally have large overstorey trees, a well-developed understorey of other tree species and shrubs, and ecological features such as dead standing trees and large logs on the forest floor. Wildlife depend on these attributes of an old growth forest as they provide a range of nesting hollows.

The only Tasmanian species of arboreal orchid, Gunn's tree orchid *Sarcochilus australis* is found inside the proposed logging area. This plant has limited numbers and a specialised habitat.

On the 10th October 2018, Bob Brown Foundation announced a new peaceful forest vigil has been established to occupy ancient forests. The blockade has been in place ever since, with a short break over winter when roading operations are not possible. In October 2019, two citizens were arrested in tree-sits advocating for protection of these forests.

Healthy Tasmanian Devils have been photographed on

remote sensor wildlife cameras positioned along the proposed route of this logging road in SU055C.

Information from Sustainable Timber Tasmania – 14.8.18: Contingency coupes are included within the Three Year Plan for many reasons including:

- to complete harvesting where only small volumes remain
- weather/soil conditions • road network condition and use
- balance of forest products to processing customers
- uncertain operational planning outcomes

1. Protest tree sit camp in SU055C, Tarkine. Forest threatened by logging for Ta Ann Tasmania.
2. Protest tree sit camp in SU055C, Tarkine. Forest threatened by logging for Ta Ann Tasmania.
3. Forest dwelling Spotted-tailed Quoll in Tarkine forests threatened by logging for Ta Ann Tasmania.
4. Tarkine forests are rich with biodiverse species including fungi, ferns, bryophytes and lichen.
5. Environmentalist Bob Brown in SU055C threatened forest in Tarkine. Photo Matthew Newton.
6. Protest tree platform in SU055C proposed logging area.

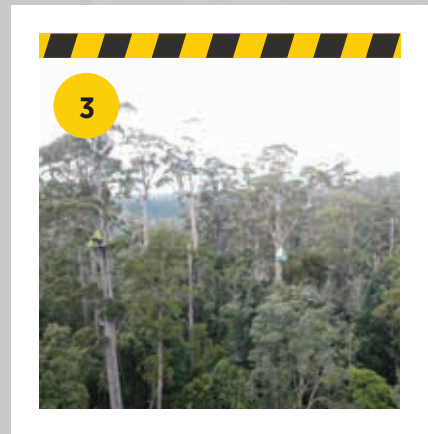
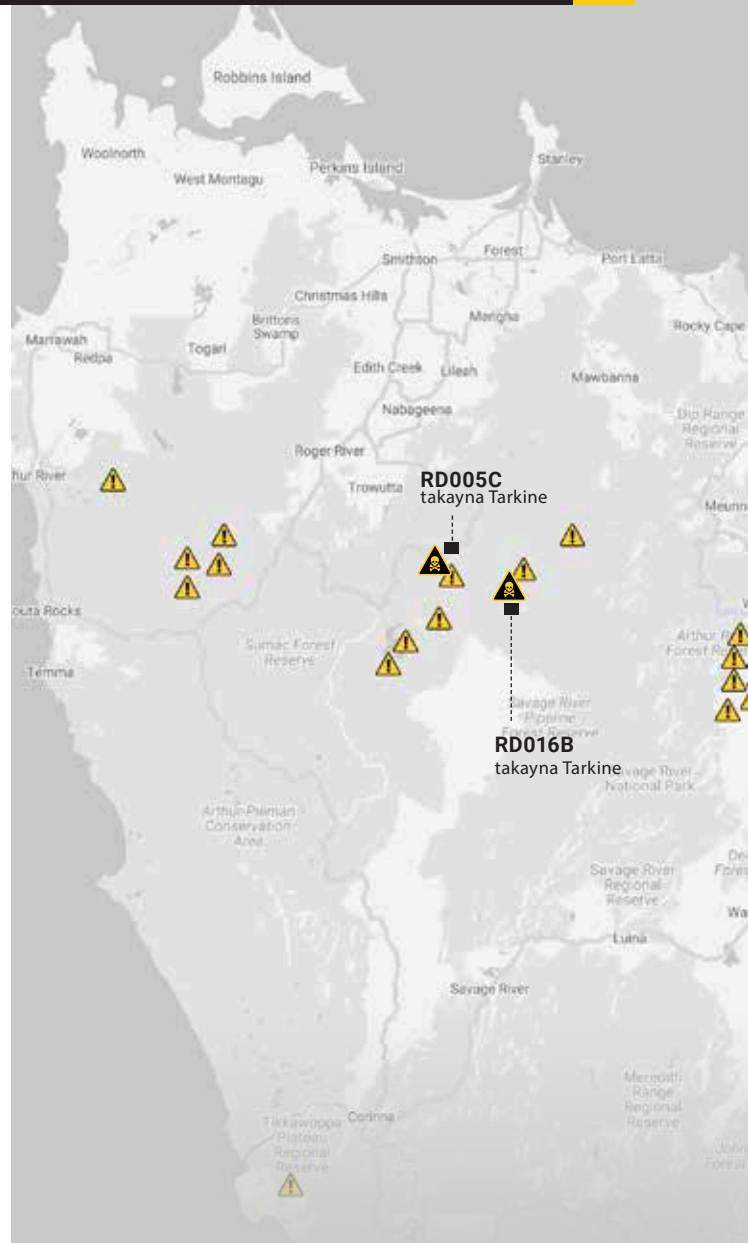


TAKAYNA / TARKINE FORESTS THREATENED BY LOGGING FOR TA ANN TASMANIA

The following twenty-seven coupes are listed for logging in takayna in Sustainable Timber Tasmania’s three-year plan and will supply Ta Ann Tasmania with peeler logs if they are logged. This logging is highly contentious and these coupes and takayna should be ruled as a no-go zone for Ta Ann Tasmania customers.

⚠️ Twenty-seven coupes are listed for logging in takayna			
BO095A	HE013A	HL010C	PW011C
BO208D	HE014A	HL033C	PW013A
FR002A	HE014B	MB008C	PW016F
FR016B	HE014C	MB023B	RD001C
FR017D	HE014D	MB023C	RD002C
FR020B	HE015B	MB032D	RD016B
FR026A	HE015C	NW011F	

There are also fifteen contingency coupes that could be logged for Ta Ann Tasmania. Sustainable Timber Tasmania fails to provide transparent information about the timber supply from contingency coupes. The precautionary principle is best placed on these contingency coupes out of takayna, as they are highly contentious and high conservation value forests.



1. Protest in Tarkine coupe BO092C Feb 2020.
2. Protest tree platform in Tarkine coupe RD016B, an area logged for Ta Ann Tasmania and still threatened by future logging.
3. Protest tree platforms in Tarkine forest RD16B. Threatened by logging for Ta Ann Tasmania. Oct 2019.

TAKAYNA / TARKINE FORESTS LOGGED FOR TA ANN TASMANIA

Rapid River is located in the North West of Tasmania starting 704 metres above sea level, running through part of the largest cool temperate rainforest surviving in Australia. Little Rapid River flows into Rapid River not long before both join the Arthur River - never logged, never dammed and free from bushfires for 650 years. Much of the area threatened by logging and recently logged in Rapid River, is on steep slopes with light soils subject to erosion. Any systematic intrusion into this region risks significant loss of habitat for fauna as the natural and long-sustained vibrant ecosystems become unbalanced through altered vegetation, stream flow and air quality.

 **RAPID RIVER RD016B.** Partially logged in 2018.

Forest type - Thamnian rainforest with potential for giant trees

In May 2018, a Conservationist was arrested while conducting a tree-sit protest in the rainforest. Our Foundation carried out protests to stall the logging in these forests and send an urgent plea to the State and Federal Government to protect the forests. In April 2018, seventeen citizens protested in the logging area calling on the government to stall the logging and put a moratorium in place.

Habitat that is crucial to the Wedge-tailed Eagle, Tasmanian Devil, quolls, Masked Owl, Grey Goshawk and headwaters of a catchment where the *Astacopsis gouldi* is found.

Our Foundation carried out independent and scientific dating of a rainforest tree logged in the forests, dating the Celery-top Pine from at 350 years old. If the Tarkine forest were not logged to supply Ta Ann, the Celery-top Pines would not

be destroyed. Rapid River region of Takayna / Tarkine is very remote and is a substantial area of intact wilderness old growth forest, which had no roads until 10 years ago.

Majority of the timber out of RD016B is pulpwood, a large quantity of timber to be supplied to Ta Ann and a small quantity to sawlogs for furniture and flooring. Out of the 30 hectares, 1000 cubic metres go to sawlog, 100 tonnes rainforest timbers, 600 cubic metres peeler to Ta Ann and 6900 tonnes woodchip.

There is still intact forests in coupe RD016B that is proposed for logging in the coming months or years.

 **RAPID RIVER RD005C** Logged 2018.

Forest type: Tall eucalyptus with wet rainforest understorey, with potential for giant trees.

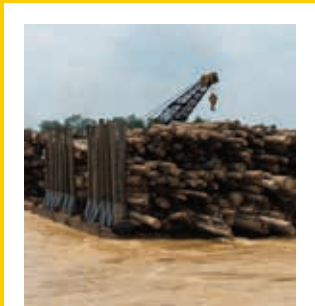
Logging: Clearfelled for Ta Ann and large quantity to woodchips.

Habitat that is crucial to the Wedge-tailed Eagle, Tasmanian Devil, quolls, Masked Owl, Grey Goshawk and headwaters of a catchment where the *Astacopsis gouldi* is found.

Our Foundation carried out a survey of the remote RD005C forest as it was being logged, discovering that rainforests that have been undisturbed for millennia have now been destroyed for woodchips and eucalyptus trees in the forest were supplied to the controversial Borneo logging and palm oil giant Ta Ann. Significantly, this forest was completely surrounded by intact forests with the tenure Future Potential Production forests. They were not included in the proposed reserves due to pressure from the logging industry to keep them, not because they lacked the same environmental values as the forests they were contiguous with.



5. Standards for procurement applied by companies in Japan's housing industry supply chain



Japan is the third largest developed country consumer market for imported wood in the world but lags behind the other two big consuming blocs, the EU and the US, in applying sanctions to imports of illegally logged wood and in the adoption of an ethic of environmental and social responsibility amongst companies involved in the supply chain.



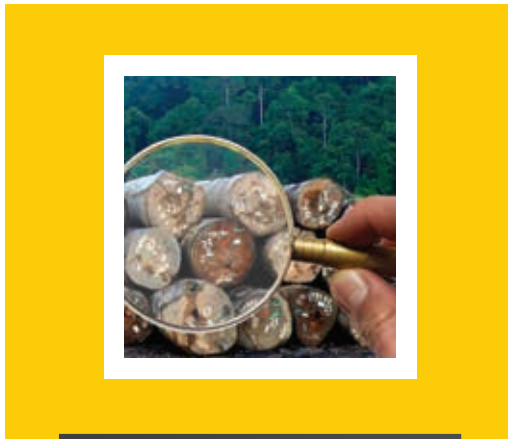
The forests of Sarawak have been falling for decades, with the logging driven substantially by demand originating from Japan. The impacts have now assumed extreme proportions, resulting in massive environmental damage together with serious social effects depriving indigenous populations of their ancestral forests, their rights and livelihoods.



In addition, S companies have their areas of operations in other countries, including those outlined elsewhere. Companies need to ensure that their timber products from these places, and the products they import from source countries



Sarawak logging has been expanding its operation to other parts of Sarawak and Australia (as mentioned in this report). This report aims to critically assess the impacts of timber coming from all over Sarawak and all the timber exported from the range of Sarawak.



Applying pressure to companies over the impacts of their timber purchasing decisions is a core component of the campaign to achieve responsible sourcing policies and thereby change the destructive impacts of Japan's housing industry on people, forests, biodiversity and climate.



Three previous reports⁴² of 2016, 2017 and 2018 on this trade, of which JATAN was one author,⁴³ have explained the need for companies to take action to counter the ongoing destruction of forests and dispossession of indigenous people in Sarawak, the key producer of plywood flooring materials utilised in Japan.



This section of the report continues a series that assesses the performance of Japanese companies in the housing industry supply chain in developing and implementing procurement guidelines designed to protect environmental values and human rights. We include a specific focus on plywood from the high risk location of Sarawak.

The Questionnaire

In December 2019 JATAN again sent a comprehensive questionnaire to xx companies in Japan's housing industry supply chain. The questions asked were also the same as previously, with the addition of one more question asking whether the company was referring to its entire procurement or perhaps only to a subset of 'eco' labelled products.

We sought information on the specific fields of Environment, Social, Scope of Procurement Requirements, and Sarawak. The questionnaire can be found on the JATAN website at:

<http://www.jatan.org/archives/4925>

Methodology

We are reliant on the answers given to us by each company. We are not responsible for their veracity. That is the responsibility of each company. We assume that the answers we receive are truthful.

We have made our best effort to assess the performance of each company against the specific criteria. Many did not answer all the questions precisely, even when they gave a response to a question, which made it challenging to compile a comparative assessment.

Procurement Policy Assessment Summary



ENVIRONMENT

Degradation or conversion of natural forests	●	●	●	●	●	●	●	●
Forest operations in primary forests	●	●	●	●	●	●	●	●
Forest operations in high carbon value forests	●	●	●	●	●	●	●	●
Forest operations in protected forests, protected species	●	●	●	●	●	●	●	●

ENVIRONMENT & SOCIAL

Proof of legality in sourcing and operations	●	●	●	●	●	●	●	●
Certification requirement	●	●	●	●	●	●	●	●

SOCIAL

Land tenure check	●	●	●	●	●	●	●	●
Proof of free, prior and informed consent from indigenous people	●	●	●	●	●	●	●	●
Checks on issuance of wood products tainted by corruption	●	●	●	●	●	●	●	●

SCOPE OF PROCUREMENT REQUIREMENTS

Existence of procurement policy	●	●	●	●	●	●	●	●
Transparency – Public availability of policy	●	●	●	●	●	●	●	●
Independent advice on policy development	●	●	●	●	●	●	●	●
Review to verify implementation	●	●	●	●	●	●	●	●
Improvement to policy guidelines	●	●	●	●	●	●	●	●

SARAWAK

Did your company investigate its supply chain for wood products from Sarawak?	●	●	●	●	●	●	●	●
Did you find wood products originating from Sarawak?	●	●	●	●	●	●	●	●
In relation to Sarawak supply, have you proven legality with document(s) issued by Sarawak state government?	NO	NO	NO	NO	NO	YES	NO	NO
Do you regard such document as sufficient to prove legality?	NO	NO	NO	NO	NO	NO	NO	NO
Did you stop procuring timber products from Sarawak?	●	●	●	●	●	●	●	●



●	●	●	●	●	*	*	*	●	●	*
●	●	●	●	●	*	*	*	●	●	*
●	●	●	●	●	*	*	*	●	●	*
●	●	●	●	●	*	*	*	●	●	*

●	●	●	●	●	●	●	●	●	*	*
●	●	●	●	●	●	●	●	●	●	*

●	●	●	●	●	*	●	*	●	●	*
●	●	●	●	●	*	●	*	●	●	*
●	●	●	●	●	*	●	*	●	●	*

●	●	●	●	●	●	●	●	●	●	●
●	●	●	●	●	●	*	*	●	●	*
●	●	●	●	●	*	*	*	●	*	*
●	●	●	●	●	●	*	*	●	*	*
●	●	●	●	●	●	*	*	●	*	*




●	●	●	●	●	●	●	●	●	●	●
●	●	●	●	*	●	●	●	*	*	*
NO	YES	YES	YES	YES	*	NO	YES	*	*	*
NO	YES	YES	NO	YES		YES	YES			
●	●	●	●	*	●	●	●	*	*	*


Key: Scoring Criteria for Procurement Policy Assessment Summary



This indicates insufficient information or irrelevance in reply and has been scored as zero.

ENVIRONMENT			
Is the degradation or conversion of natural forests prohibited?	Degradation of natural forest is not prohibited	Some insufficient protections against conversion and logging of natural forests	Degradation or conversion of natural forests is Prohibited
Are forestry operations in primary forest prohibited?	logging in primary forest not prohibited	Some insufficient protections for primary forests	Operations in primary forests are prohibited
Are forestry operations that degrade high carbon value and/or high carbon stock forest prohibited?	Not prohibited	Some insufficient protections for forest carbon	Prohibited
Are operations in protected areas prohibited? Are harvestings of protected species prohibited?	Not prohibited	Some insufficient protections	Prohibited
ENVIRONMENT & SOCIAL			
Proof of legality in sourcing and operations	No	Implicitly through suppliers	Yes, explicitly in policy and conduct due diligence themselves
Certification requirement	No certification requirements	Preferences certified timber products but does not differentiate between certifications	Preferences more reliable certification and prioritises their procurement
SOCIAL			
Is a check of land tenure required?	No	Implicitly through suppliers	Yes, explicitly in policy and conduct due diligence themselves
Is proof of free, prior and informed consent of indigenous communities required where applicable?	No	Implicitly through suppliers	Yes, explicitly in policy and conduct due diligence themselves
Is there any check on whether concession issuances and wood products are tainted by corruption?	No	Implicitly through suppliers	Yes, explicitly in policy and conduct due diligence themselves

SCOPE OF PROCUREMENT REQUIREMENTS			
Existence of policy	Does not exist	In development	Exists
Transparency - public availability of information	Not publicly available	Partial information available	Publicly available
Independent advice on policy development	No independent guidance	Use of unreliable/ unspecified advisors	Use reliable third party advice on development
Review to verify implementation	No substantive review process	Internal review	Regular third party review and verification
Improvement	No process for improvement	Internal process for improvement of policy	Consultative process for improvement of policy involving independent third party

SARAWAK	YES/NO			
Did your company investigate your supply chain for wood products originating from Sarawak?		No		Yes
Did your company find wood products originating from Sarawak?		Yes		No
In relation to Sarawak specifically: Have you proven 'legality' with document(s) issued by Sarawak State Government?	Yes/No			
Do you regard such a document as sufficient to prove 'legality'?	Yes/No			
Did you stop procuring timber products from Sarawak?		No	Reduced	Yes

1

Virtually all the companies surveyed are understood to be receiving material from Sarawak, yet the vast majority of companies remain unwilling to engage on the issues (see chart: Answer to Questionnaire by companies in the housing industry supply chain in Japan)

Participation

2

Two-thirds of recipients failed to reply at all and two companies wrote back to us that they refuse to answer as they regard the matters covered by our inquiries to be internal commercial-in-confidence information.

5

There has generally been incremental improvement from participating companies, although some have actually fallen back in their procurement policies compared to last year.

3

This failure of transparency is a breach of international best practice and indicates an unwillingness to expose their poor practices or lack of relevant procurement criteria to public scrutiny. We have to assume that many companies refuse to acknowledge their responsibility to ensure that their demand for products does not drive adverse social and environmental impacts.

6

One company, Daito Trust Construction, which is a condominium developer, has made substantial improvements.

4

Nineteen companies showed leadership by answering the questionnaire and we commend them for this. It is a big step to expose company procurement policies to external review, but is vital to attaining responsible ethical standards and to gaining the confidence of consumers and financiers in a company's products and operations.

7

A few companies that did not score well in the assessment have only recently commenced development of comprehensive policies, or are at an even earlier stage in working on doing so. This should be borne in mind when contemplating the results.

Motivating factors

Public exposure of the plywood sourcing scandal associated with the National Stadium build for the Tokyo 2020 Olympics, which involved the use of illegal and unsustainable Sarawak timber, was given as a reason for developing environmental and social procurement policies and tracing wood supply from its origin. Bad publicity of this nature draws public attention to the problem. Generally public sympathy is with protecting tropical forests and respecting the indigenous inhabitants. This occasion enabled the people to become more aware of the issues with wood supply in Japan. Conservationists hope that the public will become more active as consumers and as voters and that they will demand improved standards.

This ongoing questionnaire was also cited as a motivating factor. It is our practice to send each company a copy of our report generated from the questionnaire responses, and to also include in the report our research on supply side issues and the personal testimonials from indigenous representatives in Sarawak. We also offer meetings to the companies and make a round of visits at the time we release the report when

we discuss the findings and the implications for company procurement policies.

We understand that this repeated exercise and the strong interest it has generated in the comparative rankings amongst responding companies is contributing to the creation of a positive impetus for change.

Nonetheless, the pace of change is incremental when a fundamental step change is required across the entire industry if we are to achieve successful outcomes on the ground. This situation is made ever more critical now that the effects of climate change are becoming more apparent and alarming, and the role of saving, protecting, and restoring intact natural forests to prevent emissions and to draw down and store carbon is recognised as a priority. So called 'sustainable forest management' does not include climate and carbon criteria, and ongoing logging regimes are not an acceptable or adequate response to this crisis.



IMPORTANT ISSUES

1. Continued reliance on wood supply from Sarawak

Only one company, Misawa Homes, is not using wood sourced from Sarawak. Another, NICE Corporation, imports Sarawak wood products from the EU and North America via traders with legality documents and not directly from Sarawak. Whilst the understanding of legality and laws governing trade in illegal wood are more rigorous in those jurisdictions, it is difficult to reconcile such claims of legality with the circumstances in Sarawak.

Some companies have reduced their supply from Sarawak. Whilst this has sometimes been the result of a more rigorous application of ethical procurement policies, it should also be noted that supply availability from Sarawak has reduced and price has increased as a result of government policy. Therefore in some circumstances the reduction in supply is truly the result of improving procurement criteria, in other circumstances it is simply because the market has become constrained.

Some companies have begun to source from other locations with what they regard as a better environmental and social profile, in particular FSC certified plywood from Indonesia. However several said that this supply is not sufficient to substitute entirely for product from Sarawak.

Others said that price is the determining factor. They do not accept the higher cost of more responsible wood sources. This continued practice of putting financial considerations

of a cheap wood supply above any ethical responsibility to disassociate the company from wood produced in dubious circumstances is unacceptably bad, irresponsible behaviour.

Yet other companies find the local standards applied by the state of Sarawak and by Malaysia to be acceptable. This implies a rejection of the findings of previous reports and of internationally reputable organisations that Sarawak is a high risk location, and that reliance on domestic documentation of legality by itself is unreliable.

Some also continue to rely on the purchasing policies and assessments of their suppliers in relation to Sarawak and make no effort to also investigate their supply chain, or to put pressure on their suppliers to upgrade standards. We maintain the every company must take responsibility for the circumstances in which their wood supply was obtained and the damages to environment and to communities that were caused.

2. Better uptake of environmental standards than of social standards

Companies have made more progress on applying environmental standards to timber procurement than on social standards.

Very few companies require that wood supply should have been obtained with the free, prior and informed consent of indigenous peoples. This is a major flaw and indicates disregard for the rights and interests of indigenous peoples in places such as Sarawak, where there is an extensive history of the traditional forest land of indigenous tribes being allocated to logging corporations without seeking the permission

“Very few companies require that wood supply should have been obtained with the free, prior and informed consent of indigenous peoples. This is a major flaw and indicates disregard for the rights and interests of indigenous peoples in places such as Sarawak”



of traditional owners, who have frequently been dispossessed.

The treatment of indigenous owners of the forests is outlined elsewhere in this report.

It seems to be out of line with the international undertakings of Japan as a signatory to the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) for Japanese corporations to ignore such an important matter affecting so many indigenous communities. Under Article 8, 2 (b) *'States shall provide effective mechanisms for prevention of, and redress for... (b) Any action which has the aim or effect of dispossessing them of their lands, territories or resources'* and that implies that companies should be making sure that their wood is coming from places in which UNDRIP is being fully implemented.

The other social issue on which few companies have any provisions is a check on whether wood products have been implicated in corruption – such as the well known and documented corrupt allocation of logging concessions in Sarawak.

These two important omissions indicate an uncaring attitude to human rights and good governance.

3. Continued failure and confusion on high carbon stock forests

The recent IPCC Special Report on climate change and land⁴⁴ made it clear that it is not a luxury to care for nature but an imperative to treat conservation and restoration as a serious priority for action. These are essential actions for climate mitigation and adaptation, and to tackle the climate and biodiversity emergencies

together. **Protecting forests and other carbon rich ecosystems as stable resilient carbon stores feature as vital immediate response options**, whilst restoring degraded natural ecosystems is equally important but takes more time to achieve, so cannot substitute for now saving what is left.

Most companies do not exclude products resulting from destruction or degradation of forests containing high carbon stocks, even when they do include standards to protect biodiversity and other high conservation values. **This reflects a failure to keep pace with international concerns and actions to combat the adverse impacts on climate of logging**, clearing, and of associated drainage of peat soils in Indonesia and Malaysia.

High Conservation Value assessments alone do not often lead to the conservation and restoration of the majority of secondary or degraded forests for their carbon, and the various certification schemes do not cover this important matter. Some companies seem to assume that a forest management certification includes a high carbon stock protection, but this is incorrect.

We are at the point where emissions reductions alone cannot meet our climate goals and we must also draw carbon back out of the atmosphere, so the vital function of natural forests in sequestration must be strategically deployed in preference to their logging particularly where high carbon stocks are present or can be restored, such as in the natural forests of Sarawak and Tasmania.



4. Reliance on Japan's Clean Wood Act

We have previously outlined the flaws in the Clean Wood Act. Instead of being a comprehensive ban on imports of illegally logged wood products as is the situation in the other major consuming blocs of the world, Japan continues to allow the import of illegal wood with impunity. The Clean Wood Act is a voluntary scheme under which companies can register as supplying only legally logged timber, but has weak standards and fails to even address corruption in allocation of logging concessions or corrupt documentation of legality and supply chains.

Further, an article titled Questionable Clean Wood Act by Atsuo Tanaka, Forest Journalist,

<https://webronza.asahi.com/business/articles/2018102400005.html?page=1> has described how the Clean Wood Act can be used as a cover for illegal wood use:

'First-class dealers collect and check information on the types of trees they handle and the countries or regions where they are cut down, but do not include such information when selling the timber. Therefore, second-class traders cannot (and do not need to) understand tree species and locality. The second kind vendor checks the legality based on the documents provided by the purchaser, but it does not matter if it cannot be confirmed. In addition, the subject of legality check is limited to wood procured by itself. For example, prime contractors do not need to check the legality of timber procured by subcontractors.'

It's a monkey method that works great. The second-class traders only need to register for some of the timber used. Then it becomes a registered company, but can handle wood that cannot be verified as legal. If you find you have dealt with illegal timber, your registration will not be revoked. On the other hand, it can be explained to the public that "it is a company that handles legal timber in accordance with the Clean Wood Law." And when selling to consumers, there is no obligation to indicate whether the timber was legally treated.

For example, a house maker can register only pillar materials as subject to the Clean Wood Act and advertise "Housing with legal wood". However, other than the pillars, timber can be used for gray wood of unknown origin, and possibly for illegal wood. Still, many owners will believe that "my home was built (all) of legal wood."

In other words, the Cleanwood Act is a cover for illegal wood use if registration is used successfully.'

Whilst we are not aware of any specific instances of such deception, we stress that the Clean Wood Act is not a reliable guarantee of high environmental and social

5. Reliance on forest certification schemes

Requiring a forest management certificate is an improvement over not applying such standards, but is not a panacea and can pose numerous issues. Many of the companies who said they preference certified timber do not differentiate between certification schemes although such schemes vary significantly, as does their effectiveness.

Of the international schemes cited, Forest Stewardship Council (FSC) and Programme for Endorsement of Forest Certification (PEFC) are the most common. PEFC provides an umbrella under which local and regional schemes from around the world may be registered. Some companies suggested that they preference FSC over PEFC in relation to Sarawak, however as there are currently no logging operations in natural forests certified by FSC in Sarawak this claim is clearly problematic.

Certification can provide assurances that logging operations are less damaging than they otherwise would have been, this is only in relation to some certifications (FSC) and does not mitigate the fact that many of these areas will be irreversibly compromised regardless of better logging practise. Often certified logging operations in sensitive areas provide a gateway for further destructive activities which will permanently degrade landscapes, and give a false sense of environmental responsibility when the introduction of logging in any form is actually problematic. The concept that significant forest landscapes should remain intact is not yet in practice by any certifiers.

More exhaustive assessment of the efficacy of the various certification schemes is to be found in our earlier reports.

Recommendations



1. Japanese companies

Japanese companies in the housing industry supply chain for plywood flooring products

(i) identify and cease procurement of timber products from Sarawak until such products can be independently verified as legal, sustainable and free from corruption and human rights violations, and

(ii) conduct robust due diligence analysis on their supply chains to ensure that corruption, illegal logging, human rights violations, and environmental degradation are not associated with the timber they buy, and to immediately cease sourcing where this cannot be guaranteed.



2. Concerned citizens and consumers

Concerned citizens and consumers should become involved in urging change if natural forests treasures important for biodiversity and for carbon storage, together with human rights, traditional lifestyles and livelihoods are not to be lost forever. See the JATAN website for further information on how to contact companies.



3. Investors in companies

Investors in companies participating in Japan's housing industry supply chain should also ensure that those companies apply high procurement standards such as those operating in other developed countries. In this way investors can contribute to a positive outcome to the current unacceptable situation, and ensure that their own investment reputation on environmental and social standards is not jeopardised.

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