



31st May 2024

Rural and Regional Affairs and Transport Legislation Committee
Department of the Senate
PO Box 6100
Parliament House
Canberra
ACT 2600

Dear Secretary

Illegal Logging Prohibition Act Amendments

I am the Resource Manager for Wespine, a softwood saw miller in Western Australia and the primary supplier of structural timber for home building in Western Australia. Due to under investment in softwood plantations, government shortcomings in bushfire mitigation and active government divestment of native forest supply sources, imported timber has become a critical part of the Australian supply chain.

The new proposed legislation has good intent but does not sufficiently recognise systems that are currently effective in reducing the risk of illegal logging.

Existing systems including FSC and PEFC remain the most effective method of certifying legitimate timber supply chains. Technologies including fibre testing are emerging that will help to make these systems more effective.

However, we understand that these certification systems are not infallible, and like anything are able to be circumvented, falsified or incorrectly applied where the rule of law is weak, and corrupt practices are tolerated.

Therefore, we propose that the legislation and accompanying regulations make provision for a risk-based approach, where sources of timber supply are identified on a risk matrix. This risk matrix would be informed by such sources as corruption perception indices, strength of rule of law, and past evidence of poor practices in forest management.

For countries that are in the low-risk category (for example Australia, EU, USA and Canada) one would be able to rely upon just PEFC or FSC certification. For countries that end up in the high-risk category (for example China/Russia, Brazil, Indonesia), it would be justifiable to require additional levels of due diligence.

Wespine Industries Pty Ltd

Tel +61 8 9725 5777 PO Box 1320, 241 Moore Road,
Fax +61 8 9725 4559 Bunbury, WA, 6231 Dardanup, WA 6236

ABN 88 052 954 337

www.wespine.com.au



This would reduce the regulatory burden upon countries that have invested in and maintain effective institutions and cultural norms that discourage illegal activity, and allow for lower costs of doing business between high integrity nations.

Thank you for the opportunity to make comment.

Regards

Brad Barr
Resource Manager