

*Timber recycles carbon*



## **Timber Queensland Submission to the Senate Rural Affairs and Transport Legislation Committee on the**

### ***Illegal Logging Prohibition Bill 2011***

**Timber Queensland Limited  
P O Box 2014  
Fortitude Valley Qld 4006  
21 December 2011**

Timber Queensland Limited (TQ) is the state industry body representing the interests of the full timber value chain; from forest growers, through timber processors, merchants, and importers, to fabricators, builders and associated building professionals.

Timber Queensland has long held an interest in ensuring that timber entering Australia is of legal origin and made a submission in May 2011 to the Senate Rural Affairs and Transport Legislation Committee during their Inquiry into the exposure draft of the *Illegal Logging Prohibition Bill 2011*.

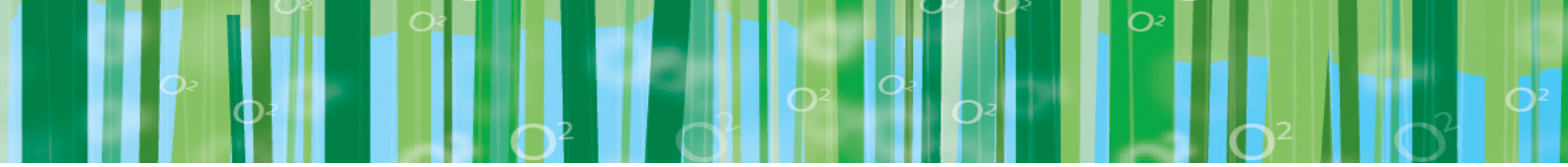
We welcome the revised Bill which takes into account most of the recommendations proposed in our submission.

In particular, our submission supported a proposal from the Australian Forest Products Association (AFPA), and called for a Bill that would require due diligence systems to ensure that imported wood products are only from legal sources, make it an offence to import illegally harvested wood products, and make it an offence to import wood products without a due diligence system in place. Our submission also sought that appropriate penalties would apply for breaches of these requirements.

Our submission also sought recognition of existing systems that demonstrate legality (such as certification) as well as reliance on existing regulatory and inspection services (e.g. customs and border security), rather than imposing a new bureaucratic and costly compliance regime based on 'Timber Industry Certifiers'.

Timber Queensland welcomed the Committee's recommendations published in June 2011, and the subsequently revised Bill which now addresses most of Timber Queensland's concerns. In particular, we welcome the recognition of "*rules or processes established or accredited by an industry or certifying body*" as a means of delivering on due diligence requirements. This should be of assistance for importers and most larger domestic processors in meeting their due diligence requirements through existing certification and other legality verification systems.

However we note that the actual requirements for timber importers and domestic processors will be established through the associated Regulations; and that these will be developed in consultation with industry and other stakeholders. Timber Queensland looks forward to contributing to this process.



Despite our general support for the revised Bill, Timber Queensland reiterates the comments in our previous submission which highlighted that legality is simply not an issue for the Australian industry. There are very strong governance systems in place to ensure both legality and sustainability in Queensland and the broader Australian timber industry which already impose a significant regulatory burden on domestic processors. Timber Queensland believes that the opportunity contained in the Bill for domestic due diligence requirements to be achieved either wholly or partly through compliance with specified laws, rules or processes will need to be explored fully in the regulations in order to deliver a system that minimises any additional cost or administrative burden.

Timber Queensland notes that appropriate funding is always critical to ensuring implementation of regulations. Implementation of this Bill will require an appropriately funded communications and outreach program to ensure that industry is aware of, and able to comply with their new obligations. Adequate resourcing of monitoring and compliance activities will also be essential to ensuring that the system is being appropriately implemented and achieving the necessary outcomes.

Although Timber Queensland supports capacity building in exporting countries to improve the legality and sustainability of overseas operations, such funding should not unduly support exporters in these countries at the expense of domestic processors.

## **Conclusions**

Timber Queensland supports action to address legality of imported wood products and welcomes the revised Bill as a significant improvement on the exposure draft. If implemented appropriately the new arrangements should be able to deliver effective and cost-efficient controls on illegal timber entering Australia. Timber Queensland would be happy to further assist the Committee as required and looks forward to contributing to the development of the regulations and due diligence systems.

For more information, contact:

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