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# **Table of Contents**

Exec	utive summary	
1.	Introduction	
2.	What is limiting plantation establishment in Gippsland?	4
3.	Summary of findings from LGA interviews	7
4.	Community attitudes and perceptions	9
5.	Case studies	9
6.	Recommendations for policy interventions	12
7.	Key stakeholders	13
8.	Monitoring framework	15
9.	References	17
10.	About PF Olsen	17



# **Executive summary**

The Gippsland Forestry Hub (the Hub) undertook this project to identify and address the barriers limiting the establishment of new private timber plantations in Gippsland. Despite national funding programs and carbon market opportunities, plantation expansion in the region has been minimal in recent years. This project investigates the underlying reasons and recommends practical interventions to stimulate growth.

#### Key findings

- Low plantation activity: Across Gippsland's six local government areas (LGAs), there has been very limited new plantation development in the past five years. Key factors include high land prices, complex planning requirements (in some cases), and some councils with limited forestry-specific knowledge.
- Financial viability: Establishing new plantations is likely to be financially viable for investors if land prices are below \$13,000 per hectare. With median land prices in most Gippsland LGAs far exceeding this threshold, investment appeal is low. However, existing landowners are better positioned to benefit due to lower opportunity costs and access to grants and carbon income.
- Community perceptions: Community attitudes towards plantations are mixed and depend on local values and land use priorities. Five broad attitude categories were identified, highlighting the need for tailored stakeholder engagement strategies.
- Regulatory complexity: Victoria's planning system can impose greater regulatory burdens on plantation developers compared to more streamlined systems in NSW and Tasmania. In one East Gippsland case study, planning processes doubled the cost of establishing a plantation, deterring future investment.

#### Policy recommendations:

- 1. **Create a tailored development pathway** for plantation projects to streamline approval processes, particularly for sub-\$10 million investments.
- 2. **Update the Code of Practice** to ensure clarity and alignment with broader environmental legislation.
- 3. Adopt a state-managed regulatory model following NSW and Tasmania's examples, to reduce reliance on local governments and improve efficiency.
- 4. **Engage with the Victorian Government** to reform environmental laws for consistency and practical implementation.
- 5. **Review specific local policies**, such as East Gippsland's 100-hectare permit threshold, which increase regulatory burdens unnecessarily.



### Stakeholder engagement strategy

A targeted engagement approach is proposed for key groups, including trusted farm advisors, growers, local and state government bodies, community organisations, investors, and environmental NGOs. Strategies include workshops, briefings, collaborative planning, and outreach programs to build trust and align objectives.

### Monitoring framework

A monitoring framework is proposed to track progress on removing barriers, with the ultimate goal of increasing plantation establishment in Gippsland. Success will depend on ongoing stakeholder collaboration, effective policy change, and demonstration of plantation benefits across economic, environmental, and social dimensions.



# 1. Introduction

# 1.1 Background

The Gippsland Forestry Hub (GFHub) is keen to explore and understand the barriers that private landowners and investors encounter when seeking to develop new plantations in Gippsland.

# 1.2 Project objectives

The objectives of this project are to identify and understand the barriers that hinder the establishment and growth of private timber plantations in the Gippsland region, and to provide strategies to overcome the obstacles identified.

# 1.3 Purpose / Scope

The scope of the project is to:

- 6. Identify regulatory, social, financial and knowledge barriers which are limiting plantation establishment.
- 7. Outline the community attitudes and perceptions to new plantations.
- 8. Provide examples, in the form of case studies from other regions that highlight where barriers have been successfully removed.
- 9. Develop a set of recommendations for policy interventions.
- 10. Identify the key stakeholders and suggest the best approach for establishing and/or fostering these relationships.
- 11. Develop a monitoring framework to track progress on the removal of barriers.

# 1.4 Methodology

We interviewed a range of stakeholders (local government, state agencies, forest managers), undertook a literature review, and leveraged PF Olsen's experience in developing new plantations in various regions of Australia.

We developed a series of questions to ask local government representatives from each of the six local government areas (LGA) in Gippsland.

We met with some of the 'referral agencies' and other Victorian government departments who have the potential to influence or regulate new plantation developments.

Forest managers were interviewed to explore their recent experiences with new plantation developments and to provide suggestions on how the planning process could be improved.



# 2. What is limiting plantation establishment in Gippsland?

Interviews with local governments in the Gippsland Region highlighted the lack of recent new plantation establishment activity. All shires reported very few (or no) Plantation Development Notifications in the past five years. A summary of findings from the LGA interviews is provided in Section 3.

#### Support Plantation Establishment program

The Australian Government is providing up to \$2,000 per hectare to assist with the establishment of new long rotation plantations in Australia through their 'Support Plantation Establishment' program. So far, \$46.58 million has been awarded to 60 projects across Australia (Australian Government, 2025). Of this, less than 5% has been awarded to the development of new plantations in Victoria. By contrast, almost 46% of the funding has been directed towards new plantations in New South Wales.

To further incentivise new plantations in Victoria, the Victorian Government have recently (August, 2025) announced up to \$1,000 per hectare in funding for successful Support Plantation Establishment program grants.

#### Carbon projects

The opportunity to register a new timber plantation as a carbon project can provide significant additional income, particularly in the early years following establishment. The Plantation Methodology¹ under the Australian Carbon Credit Unit (ACCU) Scheme enables plantation projects to be registered with the Clean Energy Regulator (CER). Following registration and plantation establishment, ACCUs are accumulated and can be sold via a broker. The Gippsland Regional Forestry Hub commissioned a Carbon Farming Guide in 2022 that provides detailed information about the Plantation Methodology (Lacy, 2022).

There are some limitations to the Plantation Methodology, particularly for plantation species that are not 'mainstream' commercial species (i.e. *Pinus radiata, Eucalyptus globulus, E. nitens, E. regnans*). When calculating the potential ACCUs from a new plantation, the species must be selected from a limited list of species available. The reason for this is based on the confidence of the underlying growth models; the mainstream species have reliable growth models. For other species, they are grouped together under a 'mixed eucalypt' option and the subsequent growth projection is very conservative. This means that the ACCU estimates are lower than what could be expected from the mainstream species on the same site.

September 25 Page 4

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<sup>&</sup>lt;sup>1</sup> The Plantation Methodology is the Carbon Credits (Carbon Farming Initiative – Plantation Forestry) Methodology Determination 2022.



The cost of registering and managing a carbon project can be significant for a small plantation area, depending on the service provider and the complexity of the project. The CER offers a reduced audit schedule requirement for small-scale plantation forests (i.e. less than 200 hectares). This means that only one audit is required, rather than the usual minimum of three audits.

#### Cost of land

The biggest impediment to investing in new plantations in Gippsland is the cost of land. Our experience in conducting financial analyses for a range of clients is that they are seeking at least a 7% return on their investment over the length of the plantation/carbon project. Of course, there are many other reasons to invest in plantations (e.g. nature repair, carbon sequestration, biodiversity, livestock protection, diversified risk, surety of supply to support processors) but the investment is mostly predicated on achieving a return that is higher than a long-term bank deposit, for example.

Based on achieving an internal rate of return (IRR) of 7%, and with a wide range of influencing variables (e.g. site productivity, proximity to market, net plantable area, establishment costs, supporting grants), the cost of land needs to be, or below \$13,000 per hectare (PF Olsen analysis). The most recent land values report published by the Bendigo Bank provides land sale data for the Gippsland shires (Table 1). The high cost of land across most of the Gippsland region makes new plantation developments a challenging investment proposition.

Table 1 - Gippsland farmland values, properties greater than 30 hectares (Bendigo Bank Agribusiness Insights, 2025)

LGA	Median price (\$/ha)
East Gippsland	9,430
Wellington	16,959
Latrobe	22,208
South Gippsland	27,665
Baw Baw	31,003
Bass Coast	37,453

## **Existing landowners**

Where the cost of land is not a consideration, now is an excellent time for developing a new plantation for existing landowners. The potential to access \$3,000/ha from the Australian and Victorian Governments and receive an early income from carbon credits (ACCUs) means a landowner can set up an additional income stream for around a quarter of the total establishment cost.



#### End of Victorian Regional Forest Agreements and right to harvest

The Victorian Government ceased harvesting of public native forests at the end of 2023. In addition, the Victorian Regional Forest Agreements (RFAs) were terminated at the end of 2024. The RFAs enabled a streamlined regulatory process for timber harvesting. Costs associated with approvals and compliance (particularly for large-scale or ecologically sensitive sites) can be substantial, sometimes doubling the cost of plantation establishment.

The right to harvest a commercial plantation in Victoria is not guaranteed, as it is in other states (see Sections 5.2 and 5.3). This additional level of risk can also limit the development of new plantations in Victoria.

#### Access to markets

It can be challenging for small plantation growers to understand the market potential of their timber, particularly for non-mainstream plantation species. The large sawmills in Gippsland have specialised in either softwood or hardwood processing and a small-scale grower has limited leverage when it comes to negotiating a sale price. Smaller sawmills generally have more flexibility on receiving a variety of tree species and it is important for the plantation owner to explore the potential markets within range of their plantation.

### Access to information

It is likely that a landowner will need support to be successful in registering a carbon project, obtaining the Australian Government grant, and establishing the plantation. The level of support will vary with the experience and knowledge of the landowner. There are a range of options in seeking support, these are:

- Victorian farm forestry networks these are supported through Forestry Australia. There
  are two in Victoria Farmed Forests of the North East and the Gippsland Agroforestry
  Network.
- Professional forestry consultants a list of Registered Forestry Professional (RFP), including the skills of the individuals, is available through the Forestry Australia website.
   Some RFPs have recognised skills in carbon plantation projects.
- Gippsland Forestry Hub can provide guidance and connections for specific plantation projects. The Hub has also produced a guide to carbon farming which can be found on their website.
- Agriculture Victoria (DEECA) has some guiding information on farm forestry (including the farm forestry toolkit) on their website. There are currently three programs to assist landowners with tree planting projects:
  - Victorian Trees on Farms Program
  - Trees on Farms Incubator Program
  - Victorian Plantations Support Program.



# 3. Summary of findings from LGA interviews

#### 3.1 General trends across shires

- Low plantation activity overall in recent years, with only sporadic new developments or notifications.
- Plantation forestry is generally considered a form of agriculture, though benefits and acceptance vary.
- Councils rely heavily on the Planning Scheme and Code of Practice, with few having their own guidelines or policies.
- Common community concerns include fire risk, land use change, feral animals, visual impact, and environmental management.
- Council capacity and experience with plantations varies significantly, with some having little in-house knowledge.
- Referral processes are common, involving agencies like DEECA, CFA, CMAs, and others.

# 3.2 Shire-specific key points

# 3.2.1 East Gippsland

- No plantation development notifications in the past 5 years; limited plantation area.
- Key benefits cited: employment, fire response, local timber access.
- Concerns include pests, fire, soil, water, and agricultural displacement.
- Supports plantations but notes uncertainty about economic value.
- Pre-application meetings are strongly encouraged; inconsistent referral advice can be an issue.

#### 3.2.2 Bass Coast

- Very limited plantation activity; no recent significant development.
- Priority is protecting traditional farming plantations seen as land use change.
- No specific plantation policies; relies on general rural land use strategies.
- Council has limited experience with forestry; more familiar with sand quarries.



## 3.2.3 Wellington

- More active than others, with 60+ Timber Harvesting Plans in 5 years.
- Plantation benefits linked with local mills in Yarram.
- Forestry is treated as agriculture, but economic benefits are mixed.
- No dedicated plantation policy or recent reviews; uses standard planning tools.

#### 3.2.4 Latrobe

- Forestry is economically significant, with ~40% land use and a major paper mill.
- Has the strongest policy support for plantations in its planning scheme.
- Community concerns about proximity to dwellings, bushfire, and rubbish dumping.
- Cites support for economic development and timber industry growth in policies.

## 3.2.5 South Gippsland

- Minimal plantation development due to high land values and beef profitability.
- Plantation sector provides little local employment; most economic benefit from plantations is in neighbouring Latrobe Shire.
- Community concerns include fauna impacts and visual amenity, but fire risk concern is low.

#### 3.2.6 Baw Baw

- Minimal plantation development I new plantation notification in the last three years.
- Recognises the importance of the timber manufacturing and forestry products industries to its local community.
- Has a specific 'Timber Encouragement Policy' in which one of its objectives is to 'promote
  the industry as a renewable resource, capturing the environmental benefits of the
  resource'.

### 3.3 Summary Insights

- Plantation development is highly localized and shaped by land economics, community values, and council policy stance.
- Councils like Latrobe and Wellington are more engaged due to local industry ties.
- Bass Coast and South Gippsland show less alignment with forestry, prioritizing agriculture and landscape amenity.



# 4. Community attitudes and perceptions

Otchere, et al., (2025) recently completed a research project that explored community attitudes and perceptions towards plantation forestry and the expansion of pine plantations. They observed high variability in people's views, which was associated with how familiar they were with the management of plantations. The researchers found that there were five categories of respondents to their survey based on attitudes towards plantations in Gippsland, which has implications for developing outreach programs. The five categories are:

- Integrated land management these respondents seemed to consider forest science and forest management issues and recognised changes to the local community and local economy as important when considering plantation acceptability.
- Hazards these respondents were most concerned about hazards related to plantation forestry. They typically had negative associations with pine plantation expansion.
- Agriculture these respondents seemed to have a stronger interest in agricultural land
  uses. They found changes to the local community important and were more likely to
  have a negative attitude towards pine plantation expansion.
- Climate Action and biodiversity this group of respondents recognised the importance
  of trees for carbon, and land use to support renewable energy. They also had concerns
  about the protection of native vegetation and the impact of plantations on biodiversity.
- Development and mining these respondents saw residential developments and mining as important land uses for the region. They were also more likely to associate pine plantations with positive impacts on native animals, native vegetation and employment.

## 5. Case studies

# 5.1 Example of a new plantation development in East Gippsland

A recent new plantation development in East Gippsland is an example of the challenges faced by parties looking to establish a new plantation estate. In this instance, the property is over 100 hectares so it required a Development Application (this is an additional requirement of this shire). The local council recommended that the project be considered by the Minister for Planning through the Development Facilitation Program. This program is designed to provide 'an expedited process for eligible projects' (Victorian Government, 2025).

The plantation developers engaged a planning specialist to ensure all aspects of the application were adequately addressed prior to submission to the Minister. The planning specialist recommended that other specialists prepare reports to cover the following aspects: water use, fire risk, ecological aspects, visual amenity, soil impacts, cultural heritage, community consultation.



The preparation of all of these reports has added at least 18 months to the project and additional cost of over \$2,500 per hectare of land. Given that typical plantation establishment costs are in the order of \$2,000 to \$3,000 per hectare, the planning cost has essentially doubled the cost of establishing the plantation.

The ultimate outcome for this plantation developer is the decision to look interstate for future plantation investments to avoid this significant planning cost.

#### 5.2 New South Wales

The NSW Plantations and Reafforestation Act 1999 is the primary legislation governing the establishment, management and harvesting of timber plantations in New South Wales.

The Act aims to:

- Promote the development of timber plantations in NSW as a sustainable and commercially viable land use.
- Simplify and streamline the approval process for plantation establishment.
- Ensure environmental protection and social accountability in plantation operations.

#### **Key features**

- Authorisation system: Landowners must obtain a Plantation Authorisation (for either new plantations or existing ones) to ensure compliance with environmental and planning standards.
- Code of Practice: Plantation operations must follow the *Plantations and Reafforestation* (Code) Regulation, which sets rules for planning, establishment, management, and harvesting (e.g. buffer zones, erosion control, biodiversity).
- **Exemptions**: Once authorised, plantations are generally exempt from local council development approvals, streamlining operations.
- **Environmental safeguards**: The Act integrates environmental assessment processes to protect soil, water, biodiversity, and cultural heritage.
- Public register: A public register of authorised plantations is maintained for transparency.

#### **Administration**

- Administered by the NSW Department of Primary Industries (DPI).
- Compliance and enforcement functions are also coordinated by the EPA (Environment Protection Authority) where applicable.
- If the proposed plantation is compliant with the relevant state Code, the registration and approval process can be as short as 14 days (NSW).



### 5.3 Tasmania

The *Tasmanian Forest Practices Act 1985* governs plantation development and forest management in Tasmania. The Act provides for the regulation of forest practices in Tasmania, including the establishment and management of plantations, with the goal of ensuring forest operations are sustainable, environmentally responsible, and economically viable.

#### **Key features**

- Forest Practices Plans (FPPs): All plantation establishment, harvesting, and replanting activities must be authorised through a certified FPP, which includes environmental safeguards and operational requirements.
- Forest Practices Code: A binding code sets out technical standards for soil conservation, water protection, biodiversity, landscape values, and cultural heritage in all forestry operations.
- Private Timber Reserves (PTRs): Landowners can apply to declare land as a PTR to simplify regulatory requirements and protect plantation use, effectively "zoning" land for long-term forestry.
- Environmental and cultural protections: The Act requires the identification and management of threatened species, habitat values, and cultural heritage before operations can proceed.

#### **Administration**

 Forest Practices Authority (FPA): An independent statutory body that certifies Forest Practices Officers, approves FPPs, provides training and guidance, monitors compliance, and enforces the Act.



# 6. Recommendations for policy interventions

We propose the following strategic interventions to assist with removing or reducing some of the legislative barriers to new plantations in Gippsland. These interventions have also been provided to the Victorian Forest Products Association, and we recommend that the Hub work with the VFPA to achieve the outcomes.

# 6.1 Design a tailored development pathway for plantation projects

Design a specific assessment pathway under the Planning and Environment Act or Development Facilitation Program for significant projects that is:

- Proportional to plantation impacts
- Streamlined for <\$10m investment</li>
- Tailored to forestry/agriculture land use (different from renewables or industrial developments).

# 6.2 Review and update the Code of Practice

Initiate a consultative process to modernise the Code, focused on:

- Addressing inconsistencies in interpretation
- Aligning it better with current environmental legislation
- Ensuring it is enforceable and practical at the LGA level.

An aim of the updated Code of Practice would be to provide a guarantee that plantation managers are 'deemed to comply' with all other environmental and cultural heritage legislation.

# 6.3 Consider a state-level model for administration/approval of new plantation developments

Other states (e.g. NSW and Tasmania) manage compliance with their relevant forestry codes through a state-managed system as described in the previous section. Authority is delegated to Forest Practices Officers (Tasmania) and Plantation Assessment Officers (NSW) to assist with new plantation developments.

This model means that there is much less involvement by local governments who may not have the necessary skills in-house to administer and regulate new plantation developments. Furthermore, the relevant state officers routinely carry out the assessments and are more familiar with forestry practices, which in turn increases the speed at which applications are considered.



# 6.4 Engage with the Victorian Government to explore the streamlining of environmental laws

Consider forming a consortium of interested parties to work with the Victorian Government to improve environmental laws to ensure their effectiveness, efficiency and consistent application.

# 6.5 Engage with the East Gippsland Shire Council that has a specific area limit for new plantations that require a planning permit

Area-based limits are known to increase unnecessarily the regulatory burden and cost of new plantation developments (refer to the case study in Section 5.1). For the Hub Region, East Gippsland is the only shire that has 100-hectare plantation limit above which a planning permit is required.

# 7. Key stakeholders

The following are key stakeholders in relation to the plantation industry with some suggestions for engagement to build trust, collaboration, and long-term alignment.

### 7.1 Trusted farm advisors

- Recognise them as key influencers and offer technical briefings.
- Workshops and peer-led field days showcasing economic/environmental benefits of plantations.
- Provide decision-support tools and resources they can use with clients.

#### 7.2 Growers, contractors and processors

- Facilitate forums to align on topical issues.
- Use case studies and data to demonstrate long-term returns and risk mitigation.

## 7.3 Local government and Catchment Management Authorities

- Provide clear guidance on the Code of Practice and support LGAs with compliance tools.
- Collaborate on catchment-scale planning for water, biodiversity, and fire management.
- Highlight economic uplift and ecosystem service benefits through tailored regional reports.



#### 7.4 State and Federal Government

- Submit policy briefs with concrete reform proposals (e.g. streamline approvals, integrate with carbon schemes).
- Demonstrate alignment with broader priorities (housing, decarbonisation, regional development).
- Advocate through peak bodies or joint submissions to amplify impact.
- Host innovation showcases to link plantation goals with research, tech and climate targets.

# 7.5 Gippsland Agroforestry Network, Landcare, and niche project originators

- Feature their work in outreach campaigns to boost visibility and credibility.
- Engage them in research-practice linkages and monitoring frameworks.
- Co-develop extension material that blends large-scale and small-scale practice.

# 7.6 Community

- Hold open days, site tours and Q&A events in key areas, in collaboration with the GAN or Landcare.
- Use plain-language communications about plantation impacts, fire risk, and water use.
- Share job creation stories, carbon benefits, and landscape restoration outcomes.

## 7.7 New plantation investors

Provide access to trusted local partners (advisors, contractors).

# 7.8 Environmental non-government organisations (ENGOs)

- Involve them early in landscape planning and code revisions.
- Highlight plantation integration with habitat corridors, water quality goals, and carbon sinks
- Explore joint pilot projects that blend commercial and conservation goals (e.g. buffer zones).



# 8. Monitoring framework

We propose the following monitoring framework to evaluate the progress on the policy intervention recommendations. Ultimately, the long-term outcome is that more plantations are established in Gippsland.

# 8.1 Objectives

- 1. Design a tailored development pathway for plantation projects
- 2. Review and update the Code of Practice for Timber Production
- 3. Explore a state-level model for plantation administration/approvals
- 4. Streamline environmental laws for effectiveness and efficiency
- 5. Engage with local governments that impose area limits or require permits

## 8.2 Indicators, data sources and methods

Objective	Key indicators	Data sources	Collection method / frequency
1. Development pathway	Completion of pathway framework  Stakeholder satisfaction  # of pilots tested	Project documents Stakeholder surveys Pilot evaluations	Quarterly project reporting  Annual stakeholder workshops
2. Code of Practice	Draft and final revised Code # of consultation events held Implementation status	DELWP/department records  Consultation feedback	Progress milestones review Biannual updates



Objective	Key indicators	Data sources	Collection method / frequency
3. State-level model	Options paper completed  Agreement on preferred model  Legislative/ administrative milestones	Internal working group docs Cabinet/executive approvals	Monthly working group meetings  Annual public reporting
4.Environmental law reform	# of laws reviewed  Recommendations implemented  Timeframes for approval reduced	Regulatory reviews  Legal analyses  Planning approval timelines	Tracking of reforms  Legal audits  Interagency workshops
5. Local government engagement	# of LGAs engaged  # of area limits clarified or amended  Feedback on engagement quality	LGA planning schemes  Meeting minutes  Shire responses	Biannual engagement log Planning scheme monitoring

# 8.3 Baselines and targets

Indicator	Baseline (2025)	Target (2028)
Completion of tailored pathway	Not started	Final pathway approved and adopted
Code of Practice update	Last updated 2014	Revised Code gazetted
Engagements with LGAs	2 of 6 target LGAs	All 6 LGAs consulted
Streamlined approval timeframe	Avg. 9 months	Reduced to 6 months



Indicator	Baseline (2025)	Target (2028)
State-level model development	Not scoped	Cabinet-endorsed model ready

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## 10. About PF Olsen

PF Olsen Australia is a specialist provider of third-party forest management services, based in Melbourne, and with operational offices in New South Wales, Victoria, South Australia, and Western Australia.

The company has been operating since 2005, and has established a significant presence in Australia, with management responsibility of over 200,000 hectares of forests throughout Australia, on behalf of our clients. We also undertake consulting assignments across a range of forest management disciplines and are established as Australia's premier forestry sector safety services provider.

PF Olsen Australia is a wholly owned subsidiary of the New Zealand based PF Olsen Group Ltd. In addition to the Australian operations, the Group is responsible for management of approximately 170,000 hectares of forests and up to 4 million tonnes annual harvest in New



Zealand. The PF Olsen Group was established in 1971 and has grown to become the leading independent forest management services provider in Australia and New Zealand.