

Remake of the Coastal IFOA's
EPA
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To whom it may concern

Blue Ridge Hardwoods (Eden) P/L, (BRH), fully supports the remake of the coastal IFOA's, with regard to reducing "the costs of implementation and compliance and to improve the clarity and enforceability of IFOA conditions".

An issue that we do have though is that the paper does not specify whether there is any resource loss associated with these "strengthened, multi-scale, landscape based protections" and "TEC maps and field guides (that) will be developed". There is lengthy discussion, and rightfully so, about how the flora, fauna and water will be looked after, but the issue of the impact of these new measures on the total resource base over time is not even considered. This appears to be a fatal flaw of this paper because it states in its "key principles" that this "remake will not affect commitments made under the RFA's and NSW FA's". For instance, within the NSW FA, it states "in making this Agreement we reaffirm the commitment of the NSW Govt. to the goals of the National Forest Policy Statement", (NFPS), and within that document there is a raft of policy determinations about sustainability and the maintenance of an on-going efficient forest products industry.

We are not saying that there is a negative impact on the resource base, we are merely saying that we don't know and this paper has a responsibility to address these issues in the context of the IFOA's role as a management tool and its history as to how and why it actually evolved.

What the paper does say is that "The new coastal IFOA's will not reduce FCNSW ability to meet high quality wood supply commitments established in the NSW Forest Agreements" and that there will be "no net change to wood supply". Our view is that these statements only relate to a certain volume over a specified time period, not the impact on the total resource base over time.

Will the remake affect sustainable supply ? Has the issue actually been considered ?

The other concern we have is Sec. **5.3, Proposed legislative amendments** and the parts related to **minimum competencies for forest contractors** and **Strengthen penalties and alternative regulatory tools**. We believe that both these Clauses have an open ended approach as to how much responsibility will be imposed on contractors after these legislative amendments, and therefore by default how much additional cost will be passed through to the customer, in this case the sawmiller. It could also be deemed feasible that contractors will not only be carrying out a major role in the administration of this new IFOA concept, but could also be penalised, (including financially) for any breaches that may occur. This could lead to a massive escalation in the cost of harvesting to the contractor and one that he or she would need to pass on to FCNSW, who would then notify the customer of the increased cost.

This concept, if embraced by FCNSW, could have the potential to bankrupt their customer base and is clearly not in line with NFPS objectives. If Govt. wants to be more concise as to how it will implement the structure of these Clauses in relation to contractors, then it would definitely put their customers in a more knowledgeable position.

One part of the current IFOA and possibly up for consideration in the remake, is the existing mandatory prescription of Buffer Zones of between 20 - 40 metres surrounding Rocky Outcrops. This company, as sawmillers for the last 60+ years, have been constantly involved with forestry and do not understand why these Buffers are needed in nearly all cases, particularly on the downhill and southern side. We believe that the reservation of Rocky outcrops with a 10m Buffer and a dedicated policy of required harvesting procedures around those outcrops, would be entirely appropriate. It should be mentioned that in most cases Rocky Outcrops actually afford Flora and Fauna some protection in their own right, by their composition and construction and given that they are normally connected to the motherload planet earth, we are confused as to why these very extensive Buffers exist. If it is a shade issue then we believe that a reasonable buffer should be placed on the northern side of those outcrops.

We look forward to your consideration of these matters.

Yours sincerely

Allan Richards
Man. Dir.