

Submission to the Remake of the Coastal Integrated Forestry Operations Approvals

I have attended the 5th and 6th workshops held in Wauchope and Sydney and wish to present this submission for consideration.

1. I strongly support the need to undertake this remake.

The original IFOAs were not born in a normal policy making environment. At the time there was a poisonous, heavily politicized battle underway between environmental interests (part of which was seeking complete closure of the native forest industry), the timber industry and the wider community. Regrettably at the time this spilt over into the bureaucracy. Various interests were either seeking territory or defending it. When the decision was made to continue with a down sized industry these embittered political opponents were then asked to formulate the IFOA processes. To a considerable degree the existing arrangements reflect that the battle was still somewhat in place.

The existing system is unnecessarily cumbersome, confusing, inefficient and ineffective. Experience has shown that it is difficult to comply with, and also to regulate. Now that the intense emotions that were present at the original writing have died down we have the opportunity to rationally consolidate knowledge and 14 years experience into a wiser and more effective document to serve the public interests.

2. I support the objectives of the remake (Page 5) as stated.

3. I note, and accept, the scope of the remake (Pages 5 and 6). I note from the meetings I attended that some are seeking to use this process to reopen wider issues such as the whole RFA agreements and future sustainability levels. Whilst I acknowledge that these are issues that will be addressed, I agree that this is not the process where these issues can or should be resolved, and consequently should not be debated.

I also note in the 4th dot point that the new IFOA should be*based on risk-management principles*. I recommend that it should also incorporate *cost-benefit* assessments. By this I mean that regulation can bring benefits both environmentally and with regard to safety etc., but it also brings costs, both in a direct monetary sense and in an indirect manner through reduced efficiencies. These factors apply equally to environmental objectives as well as industry objectives and should be continually born in mind.

4. I agree that the new Coastal IFOA should be much more concise and capable of being readily understood by both the contractors implementing it and the regulators supervising it. This is a normal regulation aspiration in all other policy areas. Clarity for all should be an underlying principle.

I agree that advances in technique and technology that improve outcomes should be incorporated in the process. This should not be so prescriptive that it prevents future advances from being incorporated in a timely manner. The document should be outcomes based both now, and as far as possible in the future.

Monitoring systems need to be futures based so that the process encourages ongoing learning and enhances the potential for continuous improvement. Studies undertaken should consider their design to enable future studies to assess the actual outcome's success or failure to achieve objectives.

I support the concept of landscape- based protection being incorporated to get better efficiencies of resources used.

5. I support the trialing of harvesting of steep slopes, noting the word, trial.

If it is demonstrated that we can, in a safe, efficient and environmentally reasonable manner, access resource in this manner, we should. This technology is used elsewhere and should be trialed here in a scientifically based manner. To do otherwise would be to let unsubstantiated or ideological fears run policy.

When remaking the IFOA it should be born in mind that the overall intent is to responsibly manage the production of the State's wood supply, and efficiency is part of this process. To regulate beyond the reasonable, with no regard to the relationships between costs and benefit/risk can be a mechanism to needlessly damage the industry and potentially deny the community a viable locally based timber industry.

Australia is a nation possessing an entire continent which is the home of the eucalyptus/gum species. This species is now being widely planted on other continents for hardwood supply. It would be an enormous irony, and injustice to future generations, if we allowed inefficient and needlessly unproductive regulation to strangle this regional industry in Australia and force our reliance on imports.

I am convinced that we have an opportunity in this remake to improve outcomes for all stakeholders in this process and redress some of the inefficiencies and wasted expenses built into existing arrangements.

I am aware of the fears, but if this time we approach the task in a mutually respectful manner utilizing new techniques and technologies, and working towards targeted environmental and industry efficiencies and outcomes, then I cannot see how the new document can fail to give improved environmental and industry benefits.

Douglas Head

Director Australian Solar Timbers

26 March 2014