

Submission on Integrated Forestry Operations Approvals (IFOA) Review.

1 Intent and Objectives

A review of the IFOAs, if it were to be conducted fairly and sensibly, with no bias, may in fact result in positive changes. However, for a number of reasons, this process is not conducted with these intentions and with a balanced and fair outcome in mind; rather to further the interests of Forestry Corporation and contractors. The objective is stated (pg. 5) as being to reduce costs and improve the clarity and enforceability of the IFOAs; and while this seems on the surface to be a desirable aim, in reality it means to cut down on money spent on regulation and make it easier for Forestry Corporation and the contractors to fulfil their Wood Supply Agreements. Another intention, to recognise innovations in best regulatory practice and to incorporate advances in technology, seems to conflict with the suggestion of introducing the outdated practice of cable logging on steep slopes. A review of the TSL framework by the Forest Practices Authority of Tasmania (pg.26) is a step in the opposite direction, as Tasmania is far from 'world's best practice', and in fact has been the source of much contention in recent years. In the past, attempts at public consultation have been a farce, and have not taken into account any of the valid public concerns raised, therefore faith in the process is quite limited. This being the case, I strongly object to the proposed changes to the IFOAs, and would recommend a different approach.

2 Cable Logging on Steep Slopes

If the intention of the IFOA review is to improve clarity and enforceability, with *no net change* to wood supply and no erosion of environmental values (pg. 5), trial cable logging on steep slopes should not be included in the review. This would effectively increase wood supply, and would have significant detrimental effects on the environment. There is a reason these slopes were not intensively logged in the past, and as they have retained much of their original conservation value, should be preserved. Cable logging on steep slopes causes intensive and destructive erosion of soil, and as such has not been approved in the past.

4 Changes to TSL/removal of prescriptions and reduction or eradication of pre logging surveys

An aim to reduce the number and complexity of conditions (pg. 11) is likely to result in less strict and applicable regulations being imposed, as is a broader 'landscape' approach. Each logging compartment is different, and blanket conditions are not as relevant to each separate ecosystem as specific ones. Reducing or removing pre-logging surveys is likely to result in overlooking species that are crucial to maintaining and

improving biodiversity values in specific areas, and the destruction of threatened species habitat. If pre logging surveys are not conducted, the lack of clarity regarding process if a threatened species is discovered during logging seems to indicate the opportunity for contractors to ignore it and carry on. The past instance of logging contractors reporting species is very low, and cannot be counted upon to effectively achieve the outcome of protecting threatened species.

5 Industry Influence at Negotiation

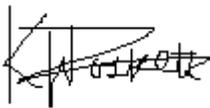
The fact that DPI has the power and opportunity to sit in on the remake of the IFOAs is a conflict of interest and perversion of the supposedly transparent and objective process. In the past, industry presence has resulted in such travesties as changing the word 'must' to 'should' and adding 'where practicable' on the end of prescriptions. The EPA should be the only party making changes to the IFOAs, and the intent is clear - to protect threatened species, not to make things easier for contractors and Forestry Corp.

6 Public Consultation Process

The public consultation process in the past has been a façade to appease community and conservation concerns. For example, in regards to the burning of native forests for electricity, over 2,200 submissions were received against the proposal. About 12 were received in favour. Despite this overwhelming rejection by the public and stakeholder groups, the proposal has gone ahead. How is anyone supposed to have faith in a process that ignores genuine objections and concerns, and sides with those few who seek to benefit from the destruction of public assets? With this in mind, the IFOA review process should seek to address and act upon issues raised and make changes to the proposed IFOA accordingly.

7 Current and Past Reviews and Survey Efforts

The monitoring that is required under the ESFM and Forest Agreements has not been undertaken and utilised, and as such no relevant data has been collected. If the required monitoring is not being completed currently, there is no indication that monitoring of these less stringent regulations will occur. Weakening the regulations will result in even more breaches and threatened species slipping through the cracks.



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