

Coastal Integrated Forestry Operations Approval – Consultation Draft

Executive Summary

May 2018



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1. Overview

The NSW Government is updating the rules for native timber harvesting in the coastal timber production forests of NSW.

On 15 May 2018, the NSW Government announced the release of a draft Coastal Integrated Forestry Operations Approval (**draft Coastal IFOA**). It sets out rules to protect native plants, animals, important habitat and ecosystems, soils and water during native forestry operations on State Forests and other Crown-timber lands. These rules are important as they balance environmental outcomes and timber production.

The making of the draft Coastal IFOA was very complex, as the NSW Government was committed to ensuring it maintained environmental values, wood supply and social outcomes. The Government has conducted a rigorous process in developing the new draft Coastal IFOA and has sought independent expert advice to ensure the right balance is struck.

The purpose of this document is to present key changes and proposed rules in the draft Coastal IFOA.

Public consultation on the draft Coastal IFOA will continue for at least six weeks, commencing on 15 May and concluding on 29 June 2018. The aim of the public consultation is to gather feedback from the community and industry to assist the NSW Government in determining whether the proposed Coastal IFOA conditions will accomplish the three aims of maintaining environmental values, while ensuring wood supply and achieving social outcomes in NSW State Forests.

The NSW Government is now inviting the public to have their say on the draft Coastal IFOA.

2. What is the new draft Coastal IFOA?

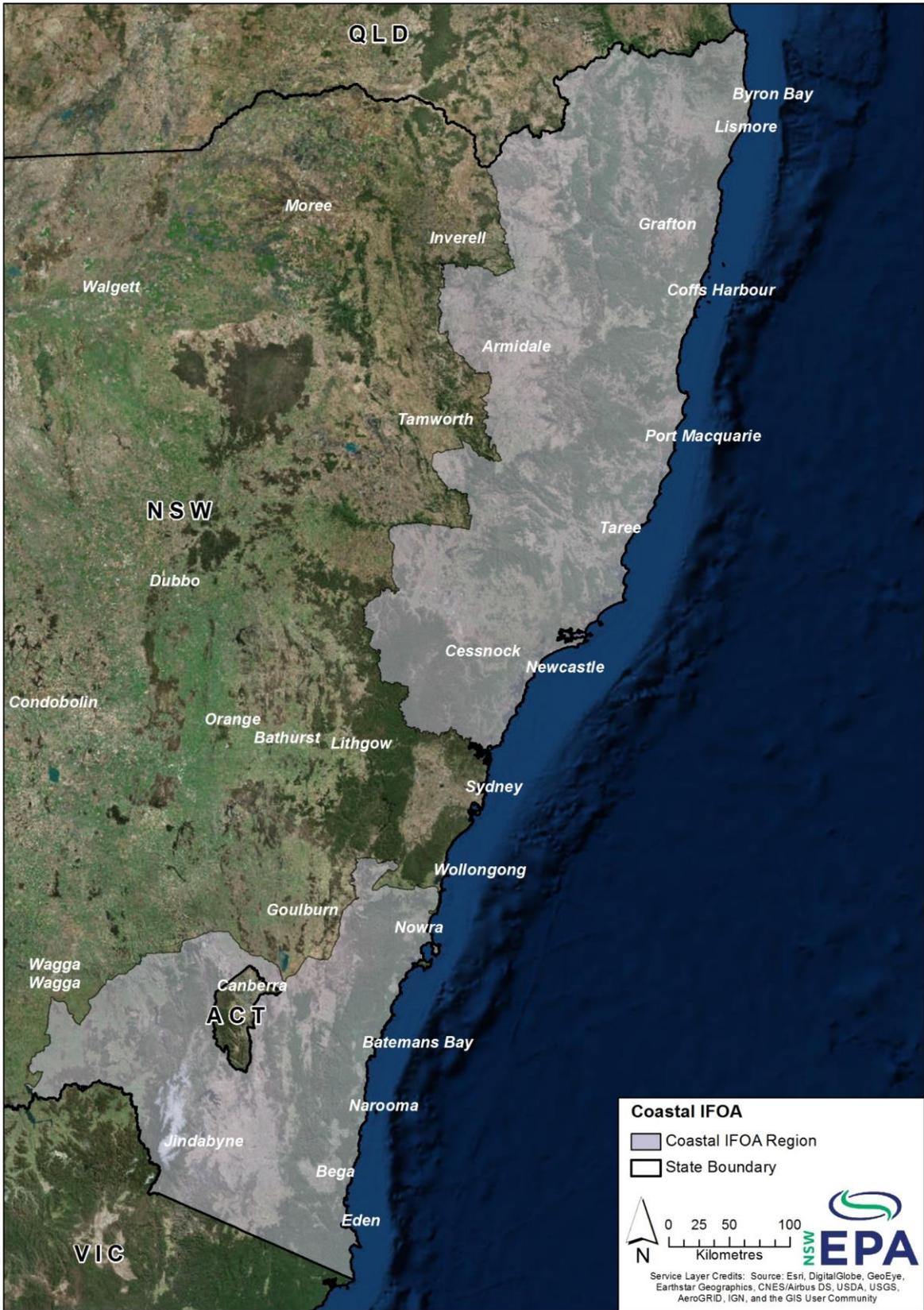
The IFOAs are the rules for conducting native forestry operations on public land.

The NSW Forest Industry Roadmap (August 2016) commits to the continuation of an ecologically sustainable native forest industry in NSW. This is delivered through overarching native forestry legislation, the Regional Forest Agreements and the IFOAs.

These agreements, policies and regulations provide a high-level framework to guide the locations where, nature of, and extent to which, native forestry can occur in NSW – *what* can be done and *where* it can be undertaken.

The draft Coastal IFOA is a critical document that outlines the detailed requirements and conditions for *how* native forestry operations can be conducted on State Forests on the coast and tablelands of NSW.

It sets the requirements for how native forestry operations in NSW deliver ecologically sustainable forest management outcomes. It prescribes the minimum standards that must be met to protect native plants and animals; important habitat and ecosystems; soils and waterways, during and following forestry operations.

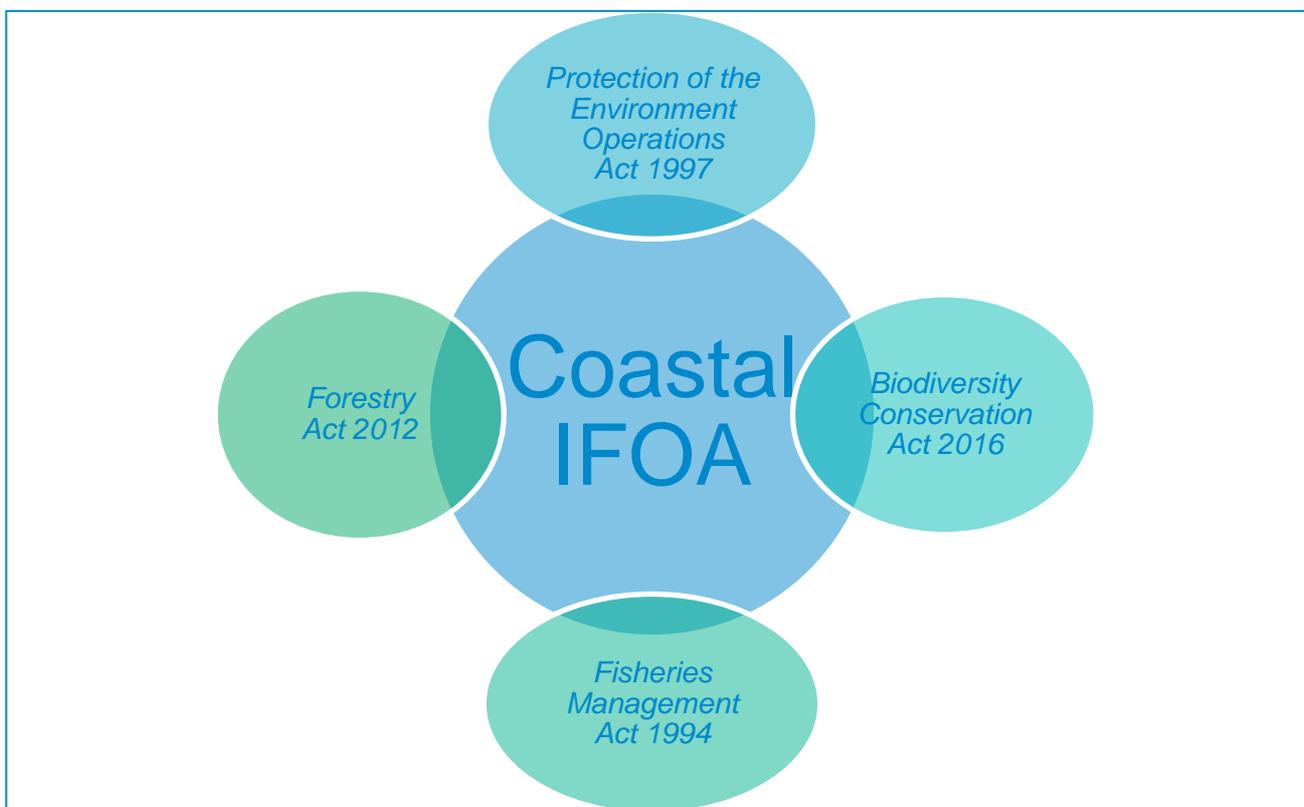


The draft Coastal IFOA region

The draft Coastal IFOA integrates the regulatory regimes for planning and assessment, the protection of the environment and threatened species conservation. As such it contains an integrated set of provisions that:

- satisfy legal provisions applying to native forestry operations under the *Forestry Act 2012*
- are equivalent to an Environment Protection Licence under the *Protection of the Environment Operations Act 1997* (POEO Act)
- are equivalent to a Biodiversity Conservation Licence under the *Biodiversity Conservation Act 2016* (BC Act)
- are equivalent to a Fisheries Licence under Part 7A of the *Fisheries Management Act 1994*.

In addition, the draft Coastal IFOA consolidates the IFOAs for Eden, Southern, Upper North East and Lower North East regions into a single IFOA for the entire coast of NSW.



The Coastal IFOA integrates the regulatory regimes of four separate NSW Acts

2.1 Why did the IFOAs need to change?

The structure of the current Coastal IFOAs is neither efficient nor effective. Over time, experience in implementing, monitoring and enforcing compliance with the Coastal IFOAs has shown they are not achieving their original purpose. Each Coastal IFOA contains over 2000 conditions, creating an overly complex operating environment that is costly to implement and difficult to enforce.

The current Coastal IFOAs are process-focused and have not allowed native forestry operations and environmental protections to keep pace with changes in technology, harvesting practices, forest management and science.

Rather than being integrated, they consist of four separate licences, including the general terms of the approval, an Environment Protection Licence, a Biodiversity Conservation Licence and a Fisheries Threatened Species Licence. These licences have similarities, meaning there is

significant duplication, but there is also inconsistency in the rules to be applied during harvesting operations. For example, each licence currently prescribes requirements for protecting streams; however, the rules for protecting them differ.

In 2010, the NSW Government conducted a statutory 10-year review of the coastal NSW Forest Agreements and IFOAs. The review recommended 63 changes to the IFOAs. These changes were implemented and finalised in March 2013, clarifying and simplifying some IFOA conditions and helping facilitate improved operational efficiency and environmental outcomes. However, the review did not address the fundamental structural issues with the IFOAs or resolve implementation and enforcement difficulties.

Given the issues identified, in May 2012 the NSW Government announced the remake of the IFOAs for the Eden, Southern, Lower North East and Upper North East regions.

2.2 The objectives of the new Coastal IFOA

The NSW Government committed to delivering a single, new Coastal IFOA that must:

1. reduce costs associated with implementation and compliance
2. improve clarity and enforceability of the conditions for protecting the environment, threatened species and fish habitat in State Forests
3. incorporate innovations in best regulatory practice and advances in technology
4. deliver a contemporary regulatory framework that is fit for purpose.

The NSW Government committed to delivering these objectives without eroding environmental values or impacting wood supply.

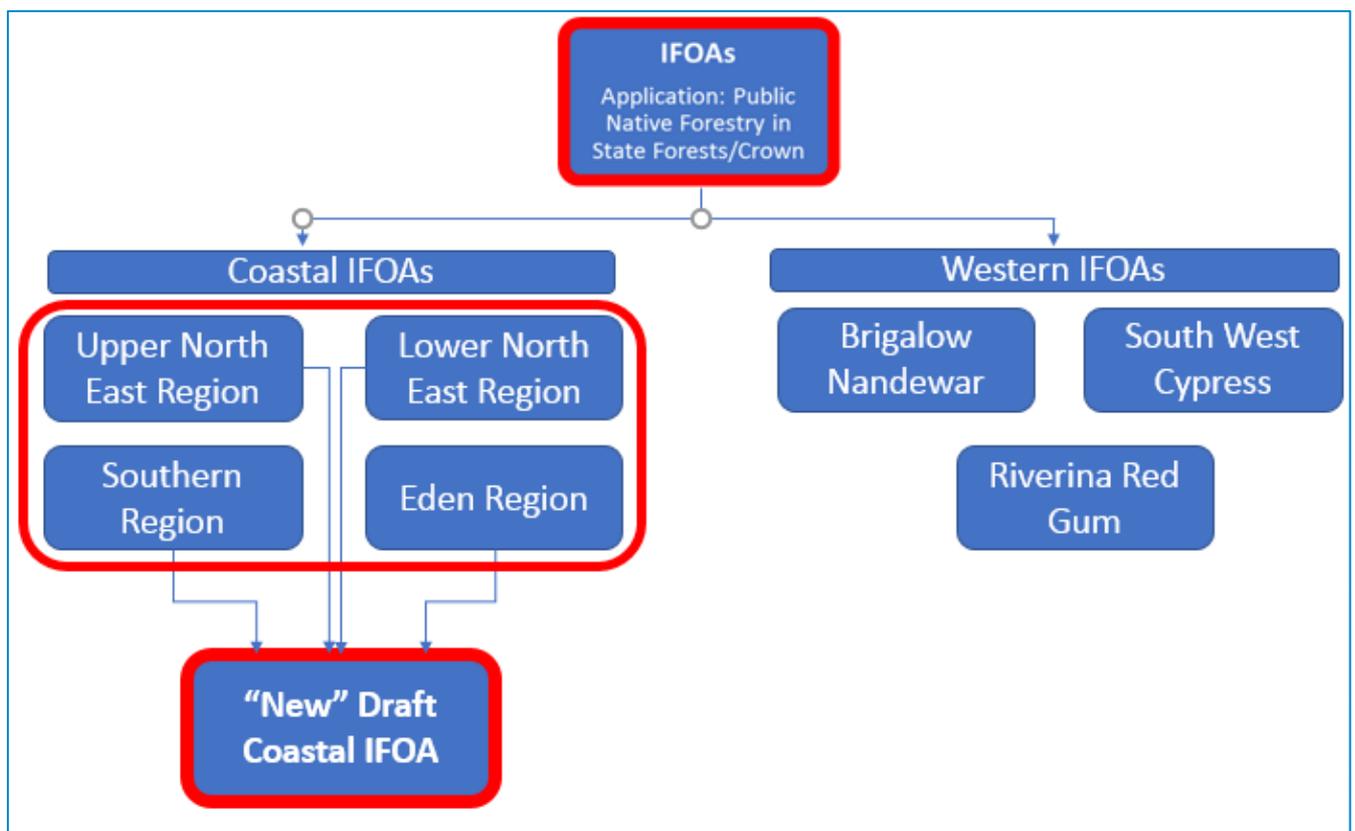
Further information on the proposal for the Coastal IFOA was set out in the NSW Government Coastal IFOA Discussion Paper, which can be found at www.epa.nsw.gov.au/your-environment/native-forestry/forestry-regulatory-reforms/coastal-ifoa-public-consultation.

3. How has it changed?

The NSW Government has undertaken a comprehensive remake of the four coastal IFOAs to address their identified weaknesses and deliver a modern regulatory framework for native forestry operations in timber production forests in coastal NSW.

The Environment Protection Authority (EPA), Forestry Corporation of NSW (FCNSW) and the Department of Primary Industries (DPI) – Fisheries have worked together to address the key issues with the existing IFOAs and have prepared proposed conditions for a draft Coastal IFOA.

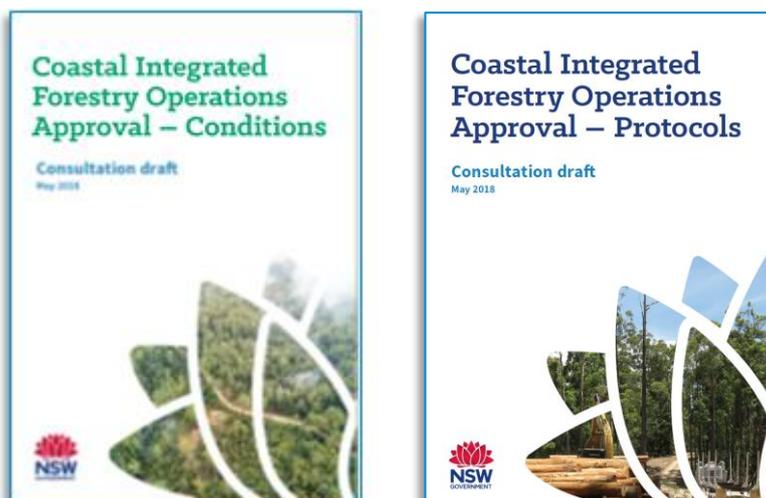
The NSW Government considers that the draft Coastal IFOA is more efficient, effective, enforceable and provides an appropriate balance between maintaining environmental values and wood supply.



The four coastal IFOAs have been integrated into a single approval

4. What is new in the coastal IFOA?

The draft Coastal IFOA proposes to fundamentally change how native plants and animals; important habitat and ecosystems; soils and waterways, are managed during forestry operations by implementing contemporary forest management practices. These changes aim to ensure improved forest regeneration and habitat protection.

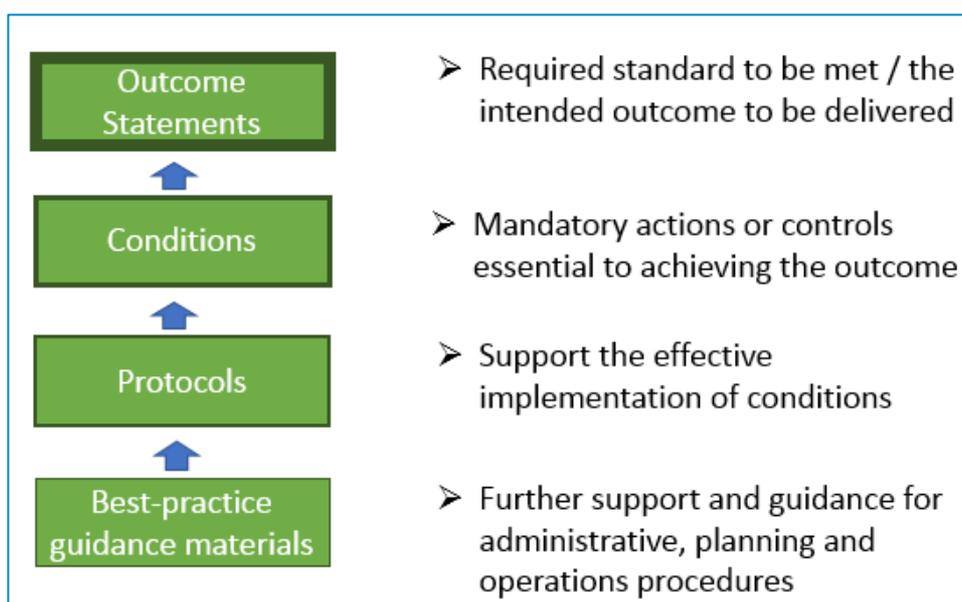


The new draft Coastal IFOA open for public consultation includes conditions and protocols

4.1 Structure and outcome-focused

The draft Coastal IFOA proposes outcome-focused regulation and has moved from a reliance on detailed and prescriptive rules towards stated principles and outcomes to be achieved. These principles and outcomes will set the standards of practice and make the identified measures of success clear to FCNSW, the regulatory authority, and the community.

The draft Coastal IFOA introduces a new structured approach, with a clear hierarchy of outcomes and conditions and protocols. The documents should be used and read in this way.



A new structure and outcome-based regulatory approach is proposed

To achieve the outcome-focused regulatory approach, each section of the draft Coastal IFOA includes a series of outcome statements. Below these sit the licence conditions, which are the mandatory actions or controls essential to achieving the required outcome. The draft Coastal IFOA protocols provide more detailed steps to achieve the outcomes and comply with the conditions.

The proposed structure and outcome-focused regulatory approach aims to:

- provide FCNSW with more flexibility to determine how specified environmental outcomes are met, while still providing the EPA and DPI-Fisheries with certainty in terms of expected compliance and environmental outcomes.

Have your say:

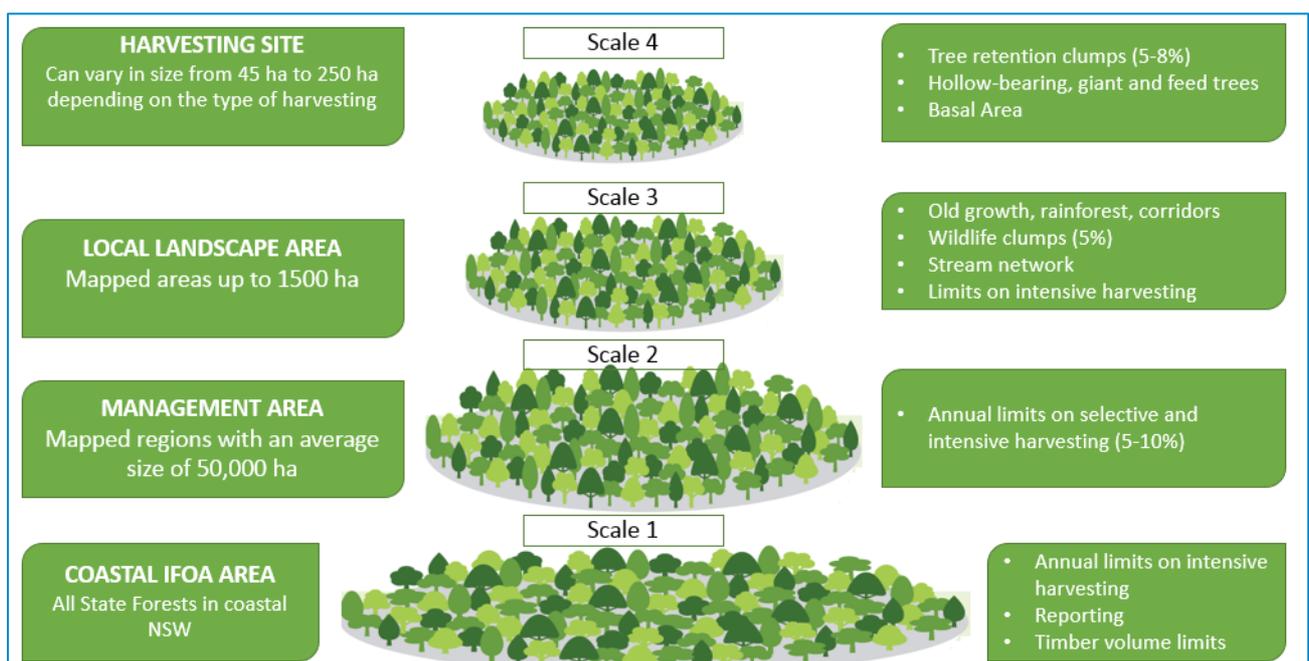
- Do you think the proposed structure of the Coastal IFOA will be more effective in achieving desired environmental and timber supply outcomes? If not, why and how can this be improved?
- Do you think the proposed outcome statements are worded appropriately and describe a physical outcome or standard that should be delivered now and into the future? If not, why and how can this be improved?
- Do you think the conditions and protocols are relevant and essential to achieving the outcomes stipulated in each of the outcome statements? If not, why and how can this be improved?

4.2 Multi-scale landscape approach

The draft Coastal IFOA proposes a multi-scale approach to delivering a comprehensive biodiversity protection model for the coastal timber production forests of NSW. It provides important habitat resources at the site, local and broader management scales.

This approach ensures the maintenance of multi-aged forests across the landscape and the permanent retention of undisturbed habitat, providing areas of refuge, as well as connectivity and dispersal opportunities for native species.

This is displayed visually in the fact sheet titled [Environmental Protection: A new multi-scale approach to forest management](#) and summarised below.



Where are these rules in the draft Coastal IFOA?

The conditions relating to the multi-scale landscape protections can be found in **Chapter 3 – Planning Conditions**, **Chapter 4 – Operational Planning and Implementation** and **Chapter 5 – Operating Conditions**. The relevant protocols are also referenced in these chapters.

The desired outcomes for the proposed multi-scale landscape approach are:

- Forest areas are allocated to logical landscape scale units to ensure conservation and timber production outcomes are adequately considered across the landscape.
- Environment protections, hazards and mitigations are identified in pre-operational plans to ensure that appropriate site-specific management practices and protections are implemented during forestry operations.
- Pre-operational surveys and assessments are undertaken to ensure that specified environmental features and risks are identified so mitigations and protections are established for an operational area.
- Harvesting is distributed across the landscape and over time, to support a mosaic of forest age-classes and maintenance of forest structure locally and across the landscape.
- Locally important environmental features including habitat, landscapes, ecological communities and threatened species habitat are identified and permanently protected to provide refuge, connectivity, and to support forest regeneration.
- Important environmental features including habitat, landscapes and communities are identified and permanently protected to support their persistence in the local landscape.
- Important feed and habitat trees are retained at levels that support their persistence in the landscape and to contribute to maintenance of biodiversity in local landscapes.

Have your say:

- Do you think the conditions and protocols relevant to the multi-scale landscape approach will effectively meet the desired outcome? If not, why and how can this be improved?

4.3 Harvesting practices and limits

The proposed Coastal IFOA will introduce new limits on the harvesting practices currently used by FCNSW. The different limits allow the impact of timber harvesting to be distributed over time and across the landscape.

The draft coastal IFOA proposes to formally recognise four harvesting practices. These are intensive, selective and mixed intensity harvesting, and alternate coupe logging. The draft Coastal IFOA prescribes where these forms of harvesting would be permitted, and specific limits to balance environmental outcomes.

These harvesting limits will be further supported by conditions that are clear and enforceable, with increased mapping requirements to monitor and ensure compliance.

The harvesting limit settings in the draft Coastal IFOA will also be supported by a comprehensive monitoring, evaluation, review and implementation framework, to ensure any potential environmental impacts are identified and adaptively managed into the future.

Further information about the changes to harvesting practices and detail on the settings can be found in the case study titled [Harvesting Practices and Regeneration Case Study](#) on the 'Have Your Say' website, as well as the [Timber Fact Sheet](#).

Where are these rules in the draft Coastal IFOA?

The requirements relating to harvesting practices and limits are found in **Chapter 1 – Condition 13** and **Chapter 3 – Division 2: Distribution of harvesting across the landscape**. The relevant protocols are also referenced in these chapters.

The desired outcomes for the harvesting practices and limits are:

- Harvesting is distributed across the landscape and over time, to support a mosaic of forest age-classes and the maintenance of forest structure locally and across the landscape.
- Conditions and protocols relating to harvesting practices and limits are easily understood and implemented, and are enforceable.

Have your say:

- Do you think the proposed harvesting practices and their limits will effectively meet the desired outcomes? If not, why and how can this be improved?

4.4 Wildlife habitat and tree retention clumps and threatened species protections

The draft Coastal IFOA proposes to set minimum thresholds for permanent protections for native plants, animals and their habitat, across the forest landscape, with targeted protections to be applied at both the landscape scale and in harvesting sites. These protections, called ‘clumps’, are not dependent on threatened species being identified; instead, they provide a more standardised and strategic approach to protecting important habitat.

The new permanent protections include ‘wildlife habitat clumps’ that apply to each local landscape area and ‘tree retention clumps’ that apply to each harvesting site.

Giant trees are proposed to be recognised for the first time as important habitat features. Giant trees and hollow-bearing trees are proposed to be permanently protected and prioritised for inclusion in tree retention clumps.

Further information about wildlife habitat and tree retention clumps can be found in the [Wildlife Clumps Case Study](#) that will be released during the public consultation period.

On the north coast of NSW, it is proposed that koala protection will move away from survey driven protection to the use of new koala mapping. Koala mapping will expand the area where koala protections will apply, and provides a more consistent and precautionary approach to retaining koala habitat across the landscape.

The draft Coastal IFOA proposes to set a minimum rate of koala feed trees to be retained, based on different types of potential koala habitat. These protections apply regardless of koalas being identified in the harvesting area. Areas with important koala habitat will be prioritised for inclusion in wildlife habitat and tree retention clumps.

On the south coast, FCNSW will be required to survey for koalas using contemporary koala survey methods. Should koalas be identified, the EPA will develop new koala conditions that are specific to the harvest site. These requirements will be adaptively managed once koala mapping becomes available on the south coast.

Further information about the proposed approaches to identifying and protecting Koalas and their habitat can be found in the [Koala Case Study](#).

These wildlife and habitat protections apply at multiple landscape scales and reduce the need to locate threatened species through costly and ineffective surveys. However, a landscape approach to protection does not cater for all threatened species, particularly threatened plant species. The draft Coastal IFOA proposes that ‘targeted surveys’ still be required to cater for some species not suited to the multi-scale landscape approach.

All threatened species protections proposed in the draft Coastal IFOA will be further supported by improved mapping requirements. This will provide the EPA with the information needed to monitor compliance, and will improve transparency for the public. They will also be supported by a comprehensive monitoring, evaluation, review and implementation framework, to ensure these proposed settings are effective at delivering their intended outcomes and can be adaptively managed into the future.

Further information about the proposed approaches for wildlife and habitat protections can be found in the [Wildlife Fact Sheet](#).

Where are these rules in the draft Coastal IFOA?

The requirements relating to wildlife and habitat protections are found in **Chapter 3 – Condition 57** and **Chapter 4 – Operational Planning and Implementation**. The relevant protocols are also referenced in these chapters.

The desired outcomes for the proposed wildlife and habitat protections are:

- Locally important environmental features including habitat, landscapes, ecological communities and threatened species habitat are identified and permanently protected to provide refuge, connectivity, and to support forest regeneration.
- Important environmental features including habitat, landscapes and communities are identified and permanently protected to support their persistence in the local landscape.
- Important feed and habitat trees are retained at levels that support their persistence in the landscape and contribute to maintenance of biodiversity in local landscapes.
- Site-specific measures are implemented for identified habitat of fauna species, to support their persistence in the landscape by mitigating impacts of forestry operations at the site.
- Site-specific measures are implemented for identified habitat of flora species, to support their persistence in the landscape by mitigating impacts of forestry operations at the site.

Have your say:

- Do you think the proposed threatened species conditions and protocols will effectively meet the desired outcomes? If not, why and how can this be improved?

4.5 Landscape protections

The draft Coastal IFOA proposes an accurate, adaptive and flexible approach to the protection and management of forest landscapes. Protections for old growth forest, rainforest and ridge and headwater habitat corridors, and large forest owl landscapes, are proposed to be carried forward unchanged into the draft Coastal IFOA.

For streams, the draft Coastal IFOA proposes adoption of the use of new technologies to more accurately and efficiently locate them, identify their locations and classify them. This involves a transition to LiDAR, a remote sensing technology that can accurately map the terrain underlying the forest canopy and identify landscape features such as streams.

New LiDAR stream mapping has accurately identified more streams than the current IFOAs consider, and will now afford protection to all streams. To ensure this increased protection does not impact on the sustainable supply of timber, the draft Coastal IFOA proposes to reduce the width of protections on headwater streams in some areas from 10 metres to 5 metres. In areas where there is important fish habitat or where more intensive harvesting is proposed, all headwater streams will retain their original 10 metre protection.

These landscape settings are further described and detailed in the [Riparian Habitat and Stream Protections Case Study](#) and the [Landscape Fact Sheet](#).

The draft Coastal IFOA proposes minimal changes to how roads and tracks are managed to protect soils and waterways. However, overly prescriptive details of how roads and tracks are to be managed and maintained by FCNSW are proposed to be removed, with the draft Coastal IFOA proposing more of a focus on delivering stable roads and tracks, and strategies to minimise the risk of water pollution.

Where are these rules in the draft Coastal IFOA?

The requirements relating to protection of landscape features are found in **Chapter 3 – Division 3: Environmentally Significant Areas (ESAs)** and **Chapter 5 – Operating Conditions**. The relevant protocols are also referenced in these chapters.

The desired outcomes for the proposed monitoring framework are:

- Locally important environmental features including habitat, landscapes, ecological communities and threatened species habitat are identified and permanently protected to provide refuge, connectivity, and to support forest regeneration.
- Riparian vegetation along each side of a drainage feature is protected to maintain water quality, stream stability, riparian habitat and contribute to habitat connectivity.
- Best management practices for roads and road crossings are implemented to minimise soil erosion and water pollution to maintain water quality, aquatic habitat and native fish movement.
- Best management practices for tracks and track crossings are implemented to minimise soil erosion and water pollution to maintain water quality, aquatic habitat and native fish movement.
- Best management practices are implemented to minimise soil erosion and water pollution to maintain water quality and aquatic habitat.
- Dust and waste are managed to minimise pollution around operational areas.

Have your say:

- Do you think the landscape requirements will effectively meet the desired outcomes? If not, why and how can this be improved?

4.6 Environmentally Significant Areas and boundary rules

The draft Coastal IFOA simplifies the rules for protecting excluded areas, called Environmentally Significant Areas (ESAs). It introduces two categories for managing ESA boundaries in native timber production forests in NSW. ESAs are areas where forestry activities are not allowed or are restricted, and include features such as rainforest, old growth, streams, bird nests and roosts, wildlife and tree retention clumps as well as ridge and headwater corridors.

The rules differ for each ESA category. On the boundary of a Category 1 ESAs, harvesting and machinery entry are prohibited and trees cannot be felled into these protected areas. These areas are generally sensitive to disturbance, or are small in size. On the boundary of Category 2 ESAs, a degree of disturbance can be tolerated, and the draft IFOA proposes limits to the degree of disturbance permitted.

Further information about the new rules for ESAs can be found in the fact sheet [Technology and Boundary Rules](#).

Where are these rules in the draft Coastal IFOA?

Specific requirements apply to each category of ESA and these are found in **Chapter 3 – Division 3: Environmentally Significant Areas (ESAs)** and **Chapter 5 – Division 2: Management of ESAs**. The relevant protocols are also referenced in these chapters.

The desired outcomes for the proposed Environmentally Significant Areas are:

- Locally important environmental features including habitat, landscapes, ecological communities and threatened species habitat are identified and permanently protected to provide refuge, connectivity, and to support forest regeneration.
- ESAs are protected during forestry operations to maintain their intended, specific environmental values.

Have your say:

- Do you think the ESA requirements will effectively meet the desired outcomes? If not, why and how can this be improved?

4.7 Improved mapping and technology

The current Coastal IFOAs have been in operation for nearly 20 years and have not kept pace with advances in technology. It is proposed that all ESAs and retained trees that require protection in the new coastal IFOA be digitally mapped, and their locations determined on the ground during harvesting operations using appropriate technologies like Global Positioning Systems (GPS).

By moving to map-based protections, there is greater transparency in what is being protected and where. It provides greater ability for the EPA to regulate efficiently and effectively, and provides safety and efficiency benefits to FCNSW and the timber industry.

Further information about the proposed use of mapping and technology can found in the fact sheet [Technology and Boundary Rules](#).

Where are these rules in the draft Coastal IFOA?

Specific requirements apply to mapping of ESAs and habitat, and the use of mapping technology. These are found at **Chapter 6 – Mapping**. The relevant protocols are also referenced in this chapter.

The desired outcome for the proposed mapping and technology improvements is:

- Accurate data layers are created, maintained and used during forestry operations and are accessible to agencies and the public.

Have your say:

- Do you think the conditions and protocols relating to mapping and use of technology will effectively meet the desired outcome? If not, why and how can this be improved?

4.8 Monitoring framework

The NSW Government acknowledges that continuous improvement involves a robust monitoring framework and commitment to change when negative impacts of current practices are identified.

Continuous improvement will be facilitated through the increased flexibility that the proposed Coastal IFOA licensing framework offers. The aim of this approach is to enable an efficient and effective response when negative impacts are demonstrated or a better methodology for achieving an outcome is identified under the draft Coastal IFOA. This approach aligns with the key Ecologically Sustainable Forest Management (ESFM) principle of applying the best available knowledge and a continuous improvement approach.

The draft Coastal IFOA proposes that a monitoring steering committee oversee the design and implementation of a monitoring program within the first 12 months of the new approval. The final

design of the monitoring program must be approved by the Chief Environmental Regulator of the EPA and the relevant Deputy Director General of DPI.

The program must be designed in a way that evaluates the effectiveness of the conditions and their associated environmental factors such as the multi-scale landscape protections, riparian and water quality protections, threatened species and their habitat and their response to harvesting and regeneration achievements. Evaluation against these indicators will provide contemporary information on how effective the Coastal IFOA conditions are in achieving outcomes and mitigating the environmental impacts of timber harvesting.

Where are these rules in the draft Coastal IFOA?

These requirements are found in **Chapter 8 – Monitoring Conditions**. The relevant protocols are also referenced in this chapter.

The desired outcome for the proposed monitoring framework is:

- Forest monitoring and adaptive management are applied at multiple landscape scales to ensure the ongoing effectiveness of the approval in delivering the stated outcomes.

Have your say:

- What do you think are the priorities for inclusion in a monitoring program?
- Do you think the proposal for a monitoring program will be beneficial for ensuring the Coastal IFOA meets its desired outcomes? If not, why and how can this be improved?

4.9 Regeneration standards

The draft Coastal IFOA establishes requirements for FCNSW to meet specified regeneration and stocking standards following harvesting operations. These proposed settings aim to improve regeneration outcomes for the forest, including requiring FCNSW to undertake remedial actions to address areas where regeneration outcomes did not meet expectations.

Where are these rules in the draft Coastal IFOA?

These requirements are found in **Chapter 7 – Regeneration**. The relevant protocol is also referenced in this chapter.

The desired outcome for the proposed regeneration standards is:

- Forests are adequately stocked to maintain ecological function and sustainable timber supplies.

Have your say:

- Do you think the regeneration requirements will effectively meet the desired outcome? If not, why and how can this be improved?

5. What informed the preparation of the draft Coastal IFOA?

The NSW Government sought independent advice from a threatened species expert panel, the Natural Resources Commission (NRC), and facilitated the testing of proposed conditions in a small-scale harvesting trial to develop the draft Coastal IFOA.

5.1 Threatened species expert panel

An expert panel of 20 qualified and experienced ecologists and botanists was convened by the NSW Government to provide advice to guide the development of protections for native species, populations and communities.

They were asked to review and advise on:

- the adequacy of proposed Coastal IFOA settings to mitigate harvesting impacts on species and populations over time and across the landscape
- the adequacy of proposed landscape, stand and site measures to protect specific threatened species, populations and communities
- what species would require specific survey and protection requirements.

Their feedback and advice was used to inform the draft Coastal IFOA.

The full expert panel report can be found on the 'Have Your Say' website titled [Final Report – Threatened Species Expert Panel Review](#) here.

5.2 Trial report – Multi-scale landscape approach

The threatened species expert panel advised that some elements required further testing to ensure that their application would not result in an erosion of environmental values. Some of the proposed components also required testing to assess potential impacts on wood supply.

To facilitate this testing the Minister for the Environment and the Minister for Primary Industries approved a temporary amendment to the Lower North East IFOA to allow a small-scale harvesting trial. A methodology to support the implementation of the amendment was approved in June 2015 by the Chief Environmental Regulator of the NSW EPA.

An operational trial of some of the conditions proposed for the Coastal IFOA was undertaken from July to September 2015 and was implemented by FCNSW with involvement from the EPA and DPI–Fisheries NSW.

The trial enabled information to be collected around key settings and enabled the NSW Government to assess the impact of the proposed conditions on timber supply, environmental values and how effective or practical they were to implement or regulate in an actual harvesting environment.

The trial identified that some of the proposed conditions would not fulfil the objectives of the IFOA remake, with resulting impacts to wood supply or an erosion of some environmental values. This required the Government to look at alternative approaches to the conditions trialled to ensure the objectives of the Coastal IFOA remake are delivered. These competing issues were then considered as part of an independent review by the Natural Resources Commission to provide further direction on new coastal IFOA settings.

A key outcome of the trial was a new proposal for protecting hollow-bearing trees using 'tree retention clumps' in harvested areas. This includes aggregating protections for these important habitat features, instead of having them dispersed across the harvested area, which potentially

compromises their longevity and usability. This concept has been incorporated in the draft Coastal IFOA and is critical in striking an improved balance between protecting environmental values and ensuring no net loss of timber supply.

The trial report will be published on the 'Have Your Say' website titled *Final Report – Trial of proposed licence conditions* during the public consultation period.

5.3 Natural Resources Commission – independent advice

In 2016, the NRC was asked to provide independent advice to the NSW Government on a suite of proposed Coastal IFOA settings and additional measures to assist the Government to deliver its commitment to maintaining both wood supply and environmental values. The NRC outlined a range of settings that it considered best balanced the delivery of these commitments. However, the NRC identified that there was potential for these settings to impact wood supply on the north coast, and this risk should be monitored.

In 2018, the NRC was asked to provide supplementary advice on additional measures to balance potential wood supply impacts of the proposed Coastal IFOA. The NRC recommended using modern mapping technology to improve the accuracy of old growth forest mapping on State Forest, and for the NSW Government to develop a framework for rezoning areas for harvesting if they are determined to have no special conservation value.

The NRC has provided two reports to the NSW Government, which can be downloaded from the NRC's website at www.nrc.nsw.gov.au/ifo.

The NSW Government has accepted the NRC's recommended IFOA settings, and these have been included in the draft Coastal IFOA, along with a range of other environment protection and forest management requirements. The NRC's recommendations on old growth forest re-mapping have also been supported, and the NSW Government will consult the public further on this in 2019.

The NRC's alternative wood supply proposals set out in the 2016 report, including initiating a steep slope trial, rehabilitating degraded public land with silviculture on all public tenures, and reviewing threatened ecological community listings, are not supported. The NSW Government does not believe these measures offer the best solution for the environment or industry because they do not align with the public's current expectations of best-practice forest management.

The [NSW Government Response to the Natural Resources Commission Reports](#) can be found on the 'Have Your Say' website.

6. How to have your say

Submissions are to be made via the 'Make a submission' tab on the 'Have your Say' website: <https://engage.environment.nsw.gov.au/forests>. Fill in the form or attach your own submission in the fields provided.

If you have any inquiries or issues with your submission please contact the EPA on 131 555.

7. What happens next?

The NSW Government will consider public feedback to inform a final Coastal IFOA. The Minister for the Environment and the Minister for Lands and Forestry will make a new Coastal IFOA later this year and will revoke the current Upper North East, Lower North East, Southern and Eden IFOAs.

The NSW Government will introduce a range of legislative changes to support the Coastal IFOA. The legislative amendments will include increased penalties for not complying with the Coastal IFOA and additional regulatory tools to deliver improved environmental outcomes.