

## What is the Coastal IFOA?

The Coastal Integrated Forestry Operations Approval (Coastal IFOA) sets out the rules for how native forestry operations are managed and regulated in state forests in the coastal regions of NSW.

It sets out rules to protect native plants, animals, important habitat and ecosystems, soils and water during native forestry operations in state forests and other Crown-timber lands.

The Coastal IFOA replaces four former IFOAs for the Eden, Southern, Upper North East and Lower North East regions.

## Why were the IFOAs remade?

The former IFOAs were developed almost 20 years ago and contain more than 2,000 conditions each. They did not keep pace with regulatory best practice and were no longer efficient or effective at managing environmental impacts from a regional perspective. They also lacked the ability to adapt and respond to emerging issues and changes in operational practices and technology.

To ensure state forests are managed in an ecologically sustainable way into the future the NSW Government committed to remake the four former coastal IFOAs. The Coastal IFOA is the result of this review process.

## What will the Coastal IFOA achieve?

The Coastal IFOA delivers on the Government's commitment to modernise the four former agreements without eroding environmental values or impacting wood supply.

The NSW Government has conducted a rigorous process in developing the Coastal IFOA and has sought independent expert advice to ensure the right balance is struck. This process was underpinned by a consultation approach to ensure the public had the opportunity to have their say.

The Coastal IFOA establishes practical, effective and enforceable licence conditions that are not

open to interpretation and are clear both to industry operators and the community.

## How will this new Coastal IFOA protect the environment?

For the first time ever, the Coastal IFOA prescribes minimum thresholds for the permanent protection of threatened species across the landscape, as well as in each harvesting site. These permanent protections provide improved protection for native plants, animals and their habitat, streams and aquatic habitat.

The Coastal IFOA delivers a comprehensive biodiversity protection model for the coastal timber production forests of NSW. It provides important habitat protections at the site, local and broader landscape 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.

The Coastal IFOA licensing framework will allow for continuous regulatory improvement. The Coastal IFOA enables an efficient and effective response when negative impacts or impractical outcomes are demonstrated, new information comes to hand or a better methodology for achieving an outcome is identified. This approach will complement a robust monitoring program that will ensure the Coastal IFOA delivers its intended outcomes into the future.

## What consultation was undertaken on the draft Coastal IFOA?

In May 2018 the draft Coastal IFOA was released for an eight-week period of public consultation. Consultation included:

- hosting a comprehensive website that contained published documents, video presentations, fact sheets, and Q&As;
- a series of independently facilitated stakeholder workshops, attended by the NSW

Environment Protection Authority (EPA), Department of Primary Industries (DPI), Natural Resources Commission (NRC) and Forestry Corporation of NSW (FCNSW) in nine locations across the Coastal IFOA region – including relevant regional forest centres; and

- inviting written submissions on the draft Coastal IFOA. Submissions were accepted via post, email and the NSW Government's 'Have Your Say' web portal. The EPA received 3,148 written submissions responding to the draft Coastal IFOA.

Consultation concluded on 13 July 2018. The Government has released a [Consultation Summary Report](#). This report integrates feedback received at workshops and in written submissions.

## Who did the Government receive feedback from?

The EPA received 3,148 written submissions responding to the draft Coastal IFOA.

419 written submissions (13 per cent) were unique and reflect the following interest areas:

- environment protection (85 per cent)
- forestry industry (8 per cent)
- apiarists (2 per cent)
- recreational (1 per cent)
- Aboriginal groups (0.5 per cent)
- science (0.5 per cent)
- local government (0.5 per cent).

The remaining submissions (representing 87 per cent of submissions received) were one of seven different campaign letters and represented either forestry industry (12 per cent) or environmental (75 per cent) stakeholder interests.

Along with the [Consultation Summary Report](#), the EPA has published all [submissions](#) where consent to make them public has been given.

## What did people say and what were some of the key issues raised?

A summary of the feedback received on the draft Coastal IFOA can be found in the [Consultation Summary Report](#).

Changes made to the Coastal IFOA reflect many of the thematic issues raised in submissions (see below).

The Coastal IFOA Consultation Summary Report provides a more detailed breakdown of issues raised during public consultation.

## What changes have been made to the Coastal IFOA because of public consultation?

The consultation process flagged that revisions to the draft Coastal IFOA would be informed by public feedback.

Changes have been made to the Coastal IFOA to improve its readability, address errors and omissions, and to make improvements identified through public consultation.

These changes do not impact on the Government's commitment to remake the coastal IFOAs with no net change in wood supply and no erosion of environmental values.

Key changes responding to public feedback include:

- increased protections for stream headwaters in higher risk areas
- reinstatement of protections for nectar trees for bees, swift parrots and regent honeyeaters
- increased retention of hollow-bearing trees
- improved management of biosecurity risks
- greater flexibility in the management of ground protection zones
- greater flexibility in the burning provisions, so that fire management can be conducted safely
- greater flexibility in the management of debris and damage to retained trees.

A summary of the changes made following public consultation on the draft Coastal IFOA can be found in the [summary response to feedback document](#).

## Why weren't other changes made to the Coastal IFOA in response to public feedback?

The NSW Government committed that the Coastal IFOA would have no net change to wood supply, and no erosion of environmental values (the twin

commitments). Many settings were developed based on advice from the NRC on how best to balance the delivery of the twin commitments.

Some of the feedback received through the public consultation process would impact on this balance. The NSW Government is committed to monitoring the implementation of settings such as harvesting intensity, selective harvesting limits, koala protection and giant trees to assess whether adaptive management of these settings is required into the future to ensure they deliver the twin commitments.

## How was the NRC involved in the development of the Coastal IFOA?

It was important that the Coastal IFOA was based on the best available scientific and independent expert advice which considered both the technical aspects of forestry practices and environmental impacts. The NRC is the government's independent expert advisory body on natural resources matters and is experienced in providing the NSW Government with advice on forest management matters.

In 2016 and again in 2018, the NRC was asked to provide independent advice on a suite of proposed Coastal IFOA settings and additional measures to assist the NSW Government in meeting its commitments of maintaining both wood supply and environmental values.

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](http://www.nrc.nsw.gov.au/ifo)

The NSW Government accepted the NRC's recommended IFOA settings set out in their 2016 report and these have been included in the Coastal IFOA, along with a range of other environment protection, forest management and monitoring requirements.

## Who reviewed public submissions?

The NSW Government engaged an independent consultant to review submissions and prepare a Consultation Summary Report. This report summarises all public consultation feedback received at information sessions and in written submissions. The EPA also reviewed all

submissions to ensure any technical matters raised were considered.

## Who will be enforcing the Coastal IFOA conditions?

The EPA will continue to regulate native forestry operations on public land to assess compliance with the Coastal IFOA. As well as responding to environmental incidents and community complaints, the EPA maintains a proactive risk-based compliance program.

The EPA has powers to monitor, investigate and report on the carrying out of forestry operations in accordance with the requirements of the Coastal IFOA. The EPA also has powers to commence criminal proceedings for a breach of a requirement of the IFOA and bring civil proceedings for an order to remedy or restrain a breach of requirements.

From commencement of the Coastal IFOA the EPA will work collaboratively with industry and the community to ensure the practical intent of new conditions is well understood and implemented.

The EPA will also continue to regulate forestry operations that have been planned or approved under the Upper North East, Lower North East, Southern and Eden IFOAs which will be enforced in accordance with the conditions of the relevant IFOA.

## Where will intensive harvesting be carried out and how many hectares are available?

The Coastal IFOA proposes additional limits on the application of intensive harvesting to distribute its impacts over time and across the landscape. This includes annual limits of no more than 2,200 hectares of forests, and/or a maximum of five percent of each management zone (an area of around 50,000 hectares), may be intensively harvested in any financial year. Rules around the size of individual intensively harvested areas and cumulative impacts are also specified.

These new limits on intensive harvesting activities are not open to interpretation and are balanced with improved environmental protections. These settings will also be supported by forest regeneration standards and a comprehensive monitoring, evaluation, review and implementation

framework, to ensure any potential environmental impacts are identified and adaptively managed into the future.

Under the Coastal IFOA, intensive harvesting will be restricted to blackbutt dominated forests between Grafton and Taree in northern NSW. FCNSW has identified a zone of about 140,000 hectares (the intensive harvesting zone) where further assessments will be undertaken to identify and map areas where intensive harvesting may occur. It is estimated that about 50,000 hectares of forest will be mapped and available for intensive harvesting.

## Will old growth forest continue to be protected from native forest harvesting?

Yes. The Government's longstanding commitment to the protection of old growth forests in NSW has not changed.

The Coastal IFOA and the old growth reassessment exercise that will be undertaken by the NRC will not allow any forestry operations in actual areas of old growth forests.

The NSW Government has requested the NRC commence an old growth reassessment exercise to assess and improve the accuracy of existing mapping of old growth forests.

The NRC will work with the Office of Environment and Heritage to develop an environmental assessment framework and, using best available technology, to independently reassess targeted sites.

Only areas identified to be incorrectly mapped as old growth forest, and that hold no other special conservation values, could be considered for rezoning to permit timber harvesting. This will only occur if a wood supply shortfall from implementing the Coastal IFOA has been independently verified.

The NRC will engage with the public in the design of the reassessment framework. For more information on the proposed reassessment of old growth forest and the reasoning behind it, visit the NRC website <http://www.nrc.nsw.gov.au/ifo>.

## Will rainforest continue to be protected from native forestry operations?

Yes. The Coastal IFOA maintains current requirements for the protection of rainforest on the north coast and there is no proposal to reassess existing mapping or protections.

On the south coast and around Eden, the EPA has undertaken work to use modern mapping technology to accurately map rainforest. Under the Coastal IFOA new rainforest maps will not be subject to on ground reassessment by FCNSW and will be permanently protected.

Even though the Natural Resources Commission 2018 Report assessed rainforest and made some findings and recommendations about the accuracy of existing mapping the NSW Government will not be undertaking any further work to reassess rainforest.

## How does the Coastal IFOA protect koalas and their habitats?

The Coastal IFOA will ensure rules for managing koala habitat are modern and that protections are always in place to manage the impacts of native forest harvesting on important koala habitat across the landscape.

The Coastal IFOA moves away from survey driven approaches to koala protection, which have been shown to have limitations. Instead it will identify and protect places in the landscape where koalas are more likely to occur. This approach will differ on the north and south coast.

On the NSW north coast, koala protection will make use of new koala maps. Koala maps will expand the area where koala protections are proposed to apply and will provide a more consistent approach to retaining koala habitat across the landscape.

The Coastal IFOA prescribes 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 new wildlife habitat and tree retention clumps – providing permanent protection for important koala habitat.

On the south coast, the 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 maps become available on the south coast.

The Coastal IFOA koala settings 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.

## How will streams be protected?

The Coastal IFOA now provides exclusion zones along all streams for the first time. The mapping of streams used in the former IFOAs was outdated and the rules for protecting them were inconsistent, resulting in some streams not being afforded any protection.

Under the Coastal IFOA, LiDAR technology has allowed for more accurate mapping of streams. This mapping has picked up a larger amount of headwater streams than that used in the former IFOAs, impacting on how streams needed to be classified in the Coastal IFOA.

In developing the Coastal IFOA, the NSW Government and FCNSW looked at other jurisdictions and designed a stream classification system based on catchment area. This means that as the catchment gets bigger, the stream exclusion zones get bigger.

Area thresholds were examined to provide an equivalent area protection outcome and to match the old stream order, both in total and at the stream order level. This approach gives the best equivalent outcome for larger streams. The Coastal IFOA conditions maintain the current 20, 30 and 50 metre buffer widths for larger streams.

Under the former IFOAs, unmapped features and headwater streams received a mixture of no exclusion zone or a 10 metre wide exclusion zone. The Coastal IFOA now sets a minimum protection of 10 metres on headwater streams in areas of high erosion potential and in areas with threatened fish habitat. In all other areas, a minimum five metre protection applies. This represents an overall increase in the protection of streams compared to the former IFOAs.

## Will the new IFOA allow for clear-felling of native forests?

No. The NSW Government has not changed its position on the prohibition of clear-felling native forests in NSW. The Coastal IFOA does not permit clear-felling.

## What happens to logging operations approved under the old IFOAs?

The Coastal IFOA includes arrangements for the transition of forestry operations from old to new IFOA conditions, without significantly disrupting previously planned forestry operations.

The Coastal IFOA provides a one-year period for **all** forestry operations that have been planned or approved under the relevant Upper North East, Lower North East, Southern and Eden IFOAs to continue. These operations will be enforced in accordance with the conditions of these relevant IFOAs. Any operations that remain outstanding after one year will be reviewed and replanned in accordance with the conditions of the Coastal IFOA.

The Coastal IFOA also provides transitional arrangements to enable FCNSW to utilise certain pre-operational planning done prior to the commencement of the Coastal IFOA for a two-year period.

## How will these new harvesting rules secure wood supply and support NSW's coastal timber industry?

The NSW Government is committed to the long term and sustainable management of NSW's forestry estate, for the benefit of the community, environment and the forestry and product manufacturing industry.

Maintaining wood supply was an overarching commitment in the development of the new Coastal IFOA.

The former IFOAs were process-focused and did not allow forestry operations to keep pace with changes in technology, harvesting practices and best practice.

The Coastal IFOA sets outcome-focused rules and moves away from a reliance on detailed and prescriptive rules towards stated principles and outcomes to be achieved. These principles and outcomes set the standards of practice and make the identified measures of success clear to the timber industry, the regulatory authority and the community.

This approach provides a simpler and more efficient operating environment for the timber industry. Further operational efficiencies will result from the implementation of modern technologies.

The Coastal IFOA installs new forest regeneration standards. These standards will ensure harvested sites are regenerated to their full potential, providing long term security of the forest resource in NSW. In addition, the Coastal IFOA establishes a comprehensive monitoring, evaluation, review and implementation framework, to ensure any potential wood supply impacts are identified and adaptively managed into the future.

The NRC (2018) advised that the NSW Government consider a process to undertake additional mapping of old growth forest using modern technologies to improve our understanding of wood supplies and environmental values in select state forest sites on the NSW North Coast.

The NRC recommend this mapping process would allow for areas to be re-zoned accurately – ensuring that important environmental habitat remains protected while allowing for timber harvesting only in areas where mapping was previously outdated and therefore does not hold special conservation value. This work will commence shortly.

## Where did the wood supply volumes come from and what do they mean?

The Coastal IFOA retains the exact wood supply caps that were specified in the former IFOAs. These wood supply figures will be updated once an independent review of sustainable yield has been carried out, and to ensure these caps align with those referenced in the Regional Forest Agreements. It is anticipated this will occur within the first 12 months of the Coastal IFOA being in operation.

The new Coastal IFOA delivers on the NSW Government's commitment to provide long term

security of wood supply and certainty to investors and the industry.

## How will beekeepers be impacted by the new Coastal IFOA?

The Coastal IFOA sets a range of new requirements to promote the permanent retention of mature flowing eucalypts across the landscape. This includes new tree retention clumps and wildlife habitat clumps. These protections are in addition to existing large landscape protections such as old growth forests, heath, rainforest and stream corridors. All of these protections ensure that floral resources critical to bee health and honey production are protected.

The NSW Government listened to the feedback from beekeepers as part of the Coastal IFOA consultation process. This has resulted in reinstating requirements for winter flowering eucalypts to be retained at a rate of five trees per hectare in certain areas.

In conjunction with the commencement of the IFOA and the *Forestry Legislation Amendment Act*, the NSW Government has made a regulation which ensures that all conditions, protections and exemptions that beekeepers enjoyed under the old coastal IFOAs are maintained upon the commencement of the new Coastal IFOA. This means that the status quo is maintained for beekeepers who place their hives in state forests.

## Why are there so many forestry reforms happening at the same time?

The 2016 NSW Forestry Industry Roadmap represents the NSW Government's strategic action plan to build a stronger, more competitive and ecologically sustainable forestry industry.

The Roadmap included specific commitments to modernise and update various regulations which underpin the sustainable management of NSW forests, including the IFOA, Regional Forest Agreement and other specific regulations relating to native forests on public and private land.

The existing IFOAs were due to expire at the end of 2018 and the first of three RFAs will expire in August 2019.

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