



We are now accepting email submissions. The form below must be filled out and attached in an email and sent to [ifoa.remake@epa.nsw.gov.au](mailto:ifoa.remake@epa.nsw.gov.au) If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.

**Make a submission – Contact Details**

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**Country\*:** Australia

**Stakeholder type (circle)\*:**

Community group	Local Government	Aboriginal group
Industry group	Other government	Forest user group
Environment group	Individual	Staff

**Other, please specify:** Sawmilling & Wood Products Company

**Organisation name:** Boral Timber (Boral)

**What is your preferred contact method:** Email

**Would you like to receive further information and updates on IFOA and forestry matters?**  
Yes

**Can the EPA make your submission public\* (circle)?** Yes

**Have you previously engaged with the EPA on forestry issues?** Yes



### **Make a submission – Form**

#### **1. What parts of the draft Coastal IFOA are most important to you? Why?**

Boral sources resource from three IFOAs, the Lower North East, Upper North East and Southern Regions. Boral is the largest native timber processor in NSW taking 66% of the high quality sawlog production on the North Coast and 75% on the South Coast.

Boral has an interest in all aspects of the Coastal IFOA Remake, the sustainability of the resource is vitally important to our business both in terms of environmental outcomes but also in terms of available volumes.

#### **2. What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?**

##### **Streamline**

Boral is supportive of the amalgamation of the existing 4 IFOA's into one unified remake. This will ensure that consistency in management is maintained across a broad cross-section of the 832,000ha of the available commercial hardwood state forest estate. The remake is more transparent and easier to interpret ensuring that forest practices are kept as relevant as possible and up to date with current policies and conditions whether they are environmental, financial or political.

##### **Technology**

The ability now to utilise modern technology in remote areas (where this was not previously available), will allow field staff and contractors access to the most current up to date information. This ensures that the forest manager can make the most informed and important decisions which will comply with the regulatory framework. This ability will enhance the protection of streams ensuring that protective buffers are maintained, that areas of old growth and protected habitats are excluded from forestry operations. This data will also allow interpretations to be made more efficiently in the field and most importantly capture and monitor information for the continual maintenance of a sustainable forest estate for generations to come.

The data collected will provide evidence of monitoring which is important for making future decisions founded on actual sound scientific data. Boral would like to see the same data collation on areas of reservation to ensure that there is an equal monitoring and consistency of data to analyse and make comparisons of management practices so future decisions are founded on actual sound scientific data across all tenures.

##### **Timber**



The tightening of prescriptions for retained Basal Areas in Selective Harvesting areas and a tightening of sampling procedure is an improvement in management and silviculture for these forests.

### **Habitat**

The permanent retention of clumps within the operational area of the compartment is a major change in the proposed IFOA remake, effectively they become reserves. The new guidelines for the retention of habitat clumps ensures that a habitat network is retained on a landscape scale as well as the local scale offering the protection and maintenance of the local biodiversity.

### **Compliance & Public Transparency**

Having a more transparent process around compliance management and allowing the interrogation of data through online map viewers will provide the public much more confidence in the process i.e. having access to updated material such as accurate operational plans. It is vitally important that there are adequate resources available to show that compliance measures are being met. This is a high priority to ensure the success of the IFOA remake.

### **3. What parts of the draft Coastal IFOA do you think have a negative outcome on the management of environmental values or the production of sustainable timber? Why?**

The largest concern Boral has with the remake of the IFOA is the ultimate cost to the industry, not only financially but resource security. The effect of the increased responsibility being put upon the contractor and the long term impact this will have on the cost of services provided and ultimately the attractiveness of the industry for an already under resourced sector. The potential loss of skilled workforce and burden of responsibility could have some long term undesired effects.

### **Timber**

The consistency of species is a major priority and importance in the commercial outcomes of the industry. Species mix may be affected by the new conditions and protocols being managed on a multiscale approach, from the harvest site level (individual tree retention prescriptions relating to koala habitat) through to imposing landscape level planning controls. Overlay this with the impact of natural elements such as seasonal variation and prolonged wet weather could pose an increased risk to the industry.

With regard to the planning cycle of compartments, the lead time to ensuring all conditions are in place before approval for operation to begin can be months to years. Ensuring there is flexibility in the system to allow for contingency plans especially if a catastrophe occurs will be a critical part that will need to be accommodated in the process. The intensive harvesting



regime whereby a 21+ year cycle system is in place is vulnerable to circumstances of natural disaster such as fire, windthrow and disease outbreaks.

### **Habitat**

Ensuring that habitat maintenance and quality is maintained across the new IFOA is crucial for the protection and maintenance of local flora and fauna. Ensuring the protection of endangered species such as the Koala and providing increase awareness and training in identification and movement for forest staff is obviously essential. The concern is the financial cost of this process and the impact it will have on the current wood supply holders who will wear these passed on costs.

The prescription of retaining Koala feed trees as set out in condition 72 “*Koala browse tree retention (North) (a) a minimum of 10 Koala browse trees in each hectare of net harvest area where browse prescription 1 applies;*” is equivalent to one tree every 34m in a triangular formation. There is a question as to whether this provides adequate space to allow for the safe maneuvering of harvesting equipment to ensure damage to retained trees is minimised while also not impacting on appropriate regeneration for shade intolerant trees.

Boral have concerns regarding some of the new Conditions. For example; 26.1 whereby “*a forestry operation must not commence or immediately cease in an operation area if within..... (b) five kilometres of an operational area there is a record or observation of Eastern Quoll, Red-tailed Black Cockatoo, Litoria piperata or Litoria castanea.*” The process of positively identifying such species and substantiating the sighting could take some time and could be disruptive to commercial operations. There is also a risk that false sightings could be used as a method to disrupt legitimate harvesting operations.

### **Compliance**

Ensuring that there are adequate resources available to guarantee that compliance is being met is a high priority to the success of the IFOA remake. Consideration needs to be given to how this resourcing will be funded to ensure that these costs are not simply passed on to either forestry contractors or timber processors. There is also a risk that the forest manager will be preoccupied with ensuring compliance rather than focusing on other land management responsibilities that don't fall under the IFOA umbrella.

#### **4. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?**

The native forests of N.S.W covered by the Coastal IFOA conditions are diverse ecosystems that have been monitored and managed over many years. Throughout this time there has been a range of complex environmental prescriptions, selective harvest regimes and multi-



scale management decisions contributing to the quality of forests being managed today. Due to the diverse nature of the forests there must be a degree of flexibility and adaptability for forest managers to achieve ecologically sustainable forest management standards.

There is a danger that the implementation of prescriptive, complex and confusing protocols and conditions leaves N.S.W's coastal forests with a one size fits all environmental compliance management system, which restricts the ability for forest managers to react to an ever changing forest ecosystem. Multi-scale protection of environmental values can be a great benefit to forest conservation as long as the Forest Managers have the ability to intervene and apply accredited practices when required.

Over the past 14 years Boral has seen harvesting costs increase at rates well above inflation driven in a large part by the onerous environmental requirements placed on FCNSW under the current set of IFOAs. At the same time we have seen the native forest industry contract as it has become increasingly difficult to extract value due to the rising cost of the raw material. Compliance costs are passed on to the processor. While it is important that there is no loss in the available timber resource, this achieves little if the cost of harvesting makes the industry unviable.

Boral had been hoping for a much more streamlined set of conditions and protocols. The proposed IFOA still contains multiple layers of complex requirements that could and should have been simplified. That said the new document is a significant improvement on the old versions.

**5. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?**

The draft Coastal IFOA contains many new avenues for the effective management of environmental assets and values while attempting to manage the balance of maintaining wood supply. The findings to date indicate that it was not possible to achieve the twin commitments, with the emphasis shown that the environmental values could be met but wood supply was impacted. Knowing this outcome and the consequence that it would have on the Industry does raise concerns as to the overall effectiveness of the proposed conditions and protocols. Furthermore the fact that majority of the new proposals are yet to



be tried and tested in an operational environment provides little confidence that a sustainable and viable wood supply can be maintained to the Industry.

Boral would encourage further testing of the proposed conditions and protocols in the Coastal IFOA. This should be carried out with the contractors who will be responsible for managing and maintaining the deliverables. This would be seen as a proactive approach to ascertain whether it is possible to achieve the twin commitments, rather than the proposed reactive approach of monitoring and reporting the outcomes after the event.

## **6. General comments**

Overall Boral is supportive of the remake of the IFOA. There is no doubt that in terms of ease of use and readability it is a significant improvement on the current documents. However Boral is disappointed that the process did not go further. There are still many complex layers of compliance requirements that will continue to be difficult and expensive to manage, while providing little in the way of additional environmental benefits. We are particularly concerned around the cost impact of these added layers of bureaucratic compliance requirements as many of these will be passed on to the timber processor.

Boral is also concerned that the twin conditions that were set down for the remake of the IFOA have not been met, and that we are now relying on meeting the shortfall in wood supply based on the results of a relatively small remapping trial. Given the complexity of the compliance requirements there are undoubtedly going to be unexpected consequences and these generally will end up restricting available wood supply or adding to costs.

Finally Boral would have preferred that this submission process was less structured. Having to submit answers to predefined questions provides less freedom than an open submission, and gives the impression that there is a desire for a predetermined result.