

A SUBMISSION ON THE DRAFT COASTAL IFOA

The opportunity to comment on the DRAFT Coastal IFOA document is appreciated and the time put in to reviewing the IFOA is respected, however, we wish to request a readdress on various aspects of the DRAFT. In light of issues raised in this Submission we respectfully ask that this DRAFT COASTAL IFOA not be rushed through to final approval but real consideration be given to comments submitted.

At the IFO information briefing held in Eden on Friday 7th June, 2018 it became clear that more work is required before any document is put forward for ratification due to:

1. Of the mapped old growth areas reviewed and information based for this IFOA they were all on the North Coast of NSW and only 13 areas were assessed in the pilot process;

It should have been realised that the South Coast and Far South Coast areas are very different to the North Coast landscape including species mix and, in our opinion, mapped old growth in this area should also have been assessed.

2. Officers at the Eden Briefing were confident in saying that there would be no significant changes in the Eden Area in the new IFOA. However, it is believed that adding new layers of exclusion will reduce nett volumes. The Forestry Corporation of NSW Officer in attendance was quite emphatic that No nett changes between IFOA documents doesn't take into account any other changes caused by anything else – not a comment to allow confidence in “no significant changes in the Eden Area”!

In regard to the DRAFT IFOA itself and given the high error levels in the 13 areas on the NSW North Coast reassessed by the Natural Resources Commission (NRC), the inclusion of the following note under 24.2 (3) (b), which states: “*Re-evaluation of old growth mapping is only permitted in areas previously unassessed for high conservation value old growth. Existing high conservation old growth mapping will not be altered under any circumstances.*” **Is totally unacceptable and should therefore be removed.**

The sample indicates there were some extraordinary factors in the original mapping. The quality of aerial photographs would have been one factor and the competence of the people doing the work is another. The mapping of old growth on both public and private and in the Northern and Southern NSW has proven to be highly inaccurate. If old growth forest is of high conservation value, then it must be properly managed and if it is to be managed then land managers must know where it is in the local and regional landscapes.

It is our opinion that given new available technology that all native forests across NSW must be remapped to ensure land managers, the public and Government know how much old growth currently exists and where it is!

In the public consultation package, it was claimed (refer slide 10) “*The Coastal IFOA must not erode environmental values or change wood supply*”. We point out that for more than 20 years forestry reform processes have promised no reduction in wood supply, unfortunately every promise has, in subsequent years, proven to be false and misleading.

Please be aware that under this Protocol 22 – Wildlife Habitat and Tree Retention Clumps - will see up to 10% of the remaining net harvest area being permanently protected and this will further erode available log supply from State Forests covered by the IFOA.

To be able to deliver the promise of *no change to wood supply*, the nett harvest area which have already been retained to protect environmentally values need to be reassessed and areas that do not contain habitat for regional priority species or forest communities, or environmental features important within the local landscape area be returned to the nett area available for harvesting.

We would like consideration to be given to Protocol 23: Tree Retention, that in regrowth forests, with low numbers of hollow bearing trees, management plans be developed to facilitate controlled damage to a percentage of trees in tree retention clumps and margins of ESAs, to accelerate the development of habitat hollows.

If hollow bearing trees are so ecologically important, levels of “damage” that will compromise the longevity of many trees, particularly health trees with no hollows, will actually deliver better ecological outcomes than if trees remain undamaged.

Under Protocol 25: Identification of rainforest on unassessed land – how can you conclude, under 25.2 (3) (b) notes: *Re-evaluation of rainforest mapping is only permitted in areas previously unassessed for rainforest. Existing areas mapped for rainforest will not be altered under any circumstances.”?* **With the flaws already recognised in previous mapping by retaining this wording erodes the authenticity of the whole IFOA process because only with CORRECT MAPPING PRACTICES OVER THE WHOLE NSW ESTATE can the true nature of all resources be available and assessed.**

In conclusion, we would point out:

- The NSW Government gave a commitment to remake the coastal IFOA so that it would be less prescriptive and more outcome-based. The opposite has occurred.
- The Coastal IFOA consultation draft includes 20 ‘outcome statements’ which are simply aspirational statements that do not result in demonstrable outcomes.
- The draft is a highly prescriptive instrument under which there is very limited operating discretion.
- Under the current IFOAs Forestry Corporation’s wood supply model (FRAMES) has proven inadequate and unreliable with major discrepancies between actual and predicted yields. In Eden reliance on modelling has seen a premature depletion of high quality sawlog resources that were originally predicted to increase over time. On the north coast the industry was impacted in 2014 by a 50,000m³ buyback of high quality logs as predicted yields weren’t sustainable.
- Adjustment factors (net harvest area modifier and strike rate modifier) are used by the Forestry Corporation to account for the IFOA prescriptions which can’t be mapped. Limited reliance can be placed on these factors under the new approval as they are based on small number of sample areas which are not truly representative and which are now out of date.
- Because the FRAMES model is not suitably equipped to capture all of the complexity of the new approval it is not appropriate for the government to claim that there will be no net change to wood supply.
- Landscape level planning controls impose new restrictions on where logs can be sourced (particularly during periods of prolonged wet weather) and this poses a risk to the supply of traditional species mix and may impact on production and haulage costs.

- The industry has not been privy to any modelling that may have been undertaken on the effect of the draft on production costs. Historically, changes to the operating rules on public land have always seen the cost of harvesting rise.
- Under the current supply arrangements Forestry Corporation passes on the cost of harvesting and transport (for high quality logs) onto its wood supply agreement holders. When harvesting or haulage costs increase they directly impact on the profitability of wood supply agreement holders. The impact on Forestry Corporation is much smaller.
- Harvesting contractors have responsibility for on-ground implementation of the IFOA conditions and protocols. The government's inability to consult with industry contractors and work with them to test the new conditions is disappointing and unprofessional. With no plans for pilot testing, the new approval leaves harvest contractors and wood processors to carry the commercial risk.
- The draft contains many new elements which will impose new obligations and costs on harvesting contractors. Forestry Corporation of NSW has recently flagged to industry that it will be seeking to delegate its obligations and responsibilities where it can to harvestings contractors. Some examples of the obligations that may be delegated include:
 - Undertake additional administrative requirements -(e.g. maintaining registers, operational tracking)
 - Become trained as a suitably qualified officer (in order to undertake on-ground assessments such as measuring of harvesting limits, recording of retained tree locations, fauna and flora habitat assessment)
 - Bear the cost of moving harvesting equipment more frequently due to smaller harvesting areas
 - Be more accountable for any breaches of IFOA conditions with penalties to be set at \$15,000 for companies and \$5,000 for individuals
- The draft is a regulatory model that is devoid of trust. The draft strips the Forestry Corporation of NSW of many of its traditional powers and replaces them with burdensome reporting and administrative obligations.
- The draft is far more onerous and prescriptive than comparable regulatory instruments applying to agricultural activities. There is no evidence provided to support the need for such a heavy-handed approach.

The draft is a narrowly conceived document which gives no consideration to the dynamic nature of the Australian bush and the need for active and adaptive management. It naively assumes that classifying forest as a reserve is enough to protect it. The draft lacks the flexibility and latitude which is needed to achieve good environmental and commercial outcomes.

- One positive aspect of the draft is that it will provide Forestry Corporation with greater silvicultural discretion in the form of new minimum basal area limits and an ability to clump retained trees.

J. Porteous
Office Manager

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