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- Q1. **First name** [REDACTED]
- Q2. **Last name** [REDACTED]
- Q3. **Phone** not answered
- Q4. **Mobile** [REDACTED]
- Q5. **Email** not answered
- Q6. **Postcode** [REDACTED]
- Q7. **Country** australia
- Q8. **Stakeholder type** Industry group
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** not answered
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** No
- Q14. **Can the EPA make your submission public?** Yes, but anonymous
- Q15. **Have you previously engaged with the EPA on forestry issues?** Yes
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**
not answered
- Q17. **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?**
not answered

Q18. 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?

not answered

Q19. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?

not answered

Q20. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?

not answered

Q21. General comments

- 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.
- 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.
- Under the proposed arrangements Forestry Corporation officers are likely to remain obsessed with operational compliance and unmotivated to undertake their other land management responsibilities for which they are not accountable.
- 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.
- The draft contains new multi-layer planning conditions which constrain where timber can be sourced, how frequently harvesting occurs and at what intensity it can occur. The draft also has more tightly prescribed requirements around the permanent retention of habitat and retained trees and new species protection prescriptions. Traditionally these things were left to the discretion of the forest manager. All of these changes are expected to have an impact on wood supply.
- Forestry Corporation's high level wood supply modelling cannot be relied upon to account for all of the new requirements in the draft. This means uncertainty will remain over the sustainability of IFOA wood supply.
- 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: o Undertake additional administrative requirements -(e.g. maintaining registers, operational tracking) o 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) o Bear the cost of moving harvesting equipment more frequently due to smaller harvesting areas o Be more accountable for any breaches of IFOA conditions with penalties to be set at \$15,000 for companies and \$5,000 for individuals • In the draft the number of species specific conditions for fauna has grown. These conditions are unduly prescriptive and complex. Most of the conditions provide additional protection to species that are listed as threatened. The conservation status of threatened fauna species can be expected to change in the future. In particular the Biodiversity Conservation Act requires a review of currently listed species in accordance with international standards. This review will result in changes to the status of some species which are listed. Threatened fauna species should be detailed in the Protocols rather than the Conditions in recognition of their changeable status.

Q22. **Attach your supporting documents (Document 1)** not answered

Q23. **Attach your supporting documents (Document 2)** not answered

Q24. **Attach your supporting documents (Document 3)** not answered
