



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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**

First Name\*: [REDACTED]

Last Name\*: [REDACTED]

Phone: [REDACTED]

Mobile\*: [REDACTED]

Email\*: [REDACTED]

Postcode\*: [REDACTED]

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: **MANAGEMENT SYSTEMS AUDITOR (FOREST MANAGEMENT)**

Organisation name: **BSI**

What is you preferred contact method (circle): Mobile, Email or phone?

**MOBILE / 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 No **Yes, but anonymous**



Have you previously engaged with the EPA on forestry issues?

### **Make a submission – Form**

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

The IFOA needs to recognise and support the existing certification requirements with respect to ISO14001 and AS4708.

In particular, timeliness of stakeholder engagement processes and provision of information that is publically accessible.

It is encouraging that the IFOA is taking a more pragmatic approach to outcomes rather than prescriptions, however the IFOA and regulatory arrangements are not built around best practice. The model developed and adopted for Tasmania (the Tasmanian Forest Practices System) provides a much more efficient and effective arrangement for achieving regulatory compliance and environmental protections.

Likewise, the Landscape Context Planning System that exists in Tasmania is a model for Best Practice with respect to planning, scheduling and managing forest operations. The IFOA remake provides an opportunity to adopt best practice.

NSW is lacking in this regard, and the EPA would be well advised to examine the systems that apply in Tasmania, particularly with respect to the costs associated with regulatory compliance.

#### **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?**

An outcomes-based approach is a significant improvement on the current arrangements.

#### **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?**

A lack of definition of the various landscape units: coupe, compartment, tract, operational area, planning unit etc.

There is no requirement for any recognition of the silvicultural needs of the various forest types. The IFOA prescribes harvesting approaches based upon intensity of operations; however there is no attempt to relate the harvesting method to the silvicultural needs of the forest based on species composition.

Forest operators will have no (or at best scant) knowledge of the various species listed requiring some form of assessment or protection.

Areas of the state have been mapped previously for landscape features such as rainforests and old growth. Practice has demonstrated that often these maps are grossly inaccurate. It is understood that the Draft IFOA is not proposing any revision. This is unjustified. Remapping should be required wherever there is an obvious error.

Drainage protections need to be applied where the drainage feature exists, rather than where it is mapped. Historical mapping has been shown to be frequently in error. The IFOA should not



require protection of any watercourse that simply doesn't exist. The LiDAR imagery will greatly assist in better mapping but the protections need to be applied where they are required rather than where they are mapped.

**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 lack of description of the various land management units is problematic.

Coupe, compartment, tract, State Forest, operational area, area subject to forest operations, local landscape area, base net area are all terms that are used. Not all have definitions and the hierarchy is unclear.

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

It is difficult to provide a meaningful answer to this. There is no framework for measuring the success or otherwise of the management approach. A long-term ecological monitoring process is required, with clearly established parameters and metrics that can be periodically assessed and objectively reported. In the absence of any baseline work, it is unclear how the 'maintain and improve' objective can be claimed.

**6. General comments**

**1. Best practice regulation**

The proposed regulatory framework is an improvement on the current arrangements; however it is far from optimum with respect to best practice. The model adopted in Tasmania (Tasmanian Forest Practices System) is by far the most effective regulatory framework for native forest management in Australia. Likewise, the Landscape Context Planning System employed in Tasmania is streets ahead of the arrangements proposed in the Draft IFOA. It would be negligent for the NSW Government not to fully assess and evaluate the merits of the Forest Practices System and the Landscape Context Planning System adopted in Tasmania. The Tasmanian system has the capacity to be readily adapted to any other jurisdiction and its merits are unquestionable.

**2. Stakeholder engagement**

The proposed regulatory framework is an improvement on the current arrangements; however it is far from optimum with respect to best practice. The model adopted in Tasmania (Tasmanian Forest Practices System) is by far the most effective regulatory framework for native forest management in Australia. Likewise, the Landscape Context Planning System employed in Tasmania is streets ahead of the arrangements proposed in the Draft IFOA. It would be negligent for the NSW Government not to fully assess and evaluate the merits of the Forest Practices System and the Landscape Context Planning System adopted in Tasmania. The Tasmanian system has the capacity to be readily adapted to any other jurisdiction and its merits are unquestionable.

**2. Stakeholder engagement – operational planning**

The Draft IFOA should support the arrangements for stakeholder engagement that are required by the certification Standard (AS4708). In this regard, FCNSW is required to engage with stakeholder who are interested in or affected by its activities. This includes in the development



and review of the organisation's (long-term) Strategic Management Plan as well as engagement with affected parties in the development of pre-operational plans at a local level. The IFOA is proposing an Annual Operational Plan to be provided in June each year, however there is no requirement to engage in any way with the relevant interested and/or affected parties in the development of pre-operational plans.

### **3. Stakeholder engagement – timeliness of notification**

The IFOA only required a two day notice of operations, prior to commencement of activities. This does not allow sufficient time for any meaningful engagement. The Standard requires the organisation to encourage and facilitate meaningful engagement. It would be helpful if this was reinforced within the IFOA.

### **4. Landscape units**

As an auditor, I find it difficult to understand the hierarchy of the various landscape units. As described above, there are many terms used, e.g. coupe, compartment, tract, State Forest, operational area, area subject to forest operations, local landscape area, base net area etc. The IFOA or supporting information need to describe these more clearly so that we can have a better understanding of how planning will be developed.

### **5. Protection of rocky outcrops**

While clearly well-intentioned, the restrictions around management activities in proximity to rocky outcrops and cliffs, does not necessarily ensure the best environmental outcomes. As we have seen on the south coast, there are areas where harvesting and disturbance has been prevented in proximity to such areas and as a result, invasion by trees has led to a decrease in light into some rocky outcrops endangering the existence of some reptiles that rely on the areas being maintained open and unshaded. Greater assessment is needed and a lack of disturbance is not necessarily the answer.

The relevant Protocol would be well-supported with some photographs of what would constitute a rocky outcrop or cliff, and what would not, so as to assist in the interpretation.

### **6. Metadata**

It would be helpful if the requirements for metadata were better defined. We know what metadata is, but exactly what bits need to be included (date, author, etc.).

### **7. Long-term ecological monitoring**

While it's encouraging that we are going to have a monitoring framework and Committee, we need a scientifically-based long-term ecological monitoring framework that can not only establish where we are now, (base-line assessment of species diversity and occupancy) as well as meaningful and realistic monitoring over time (say every 5 or ten years) that will have the capacity to either verify the effectiveness of current management or identify deficiencies in a timely manner.

In the absence of a well-structured and robust long-term ecological monitoring framework, we are simply making huge assumptions on the sustainability of forest operations.

### **8. Haulage operations**

The Protocols require haulage operations to cease in certain situations (109.1). Is this 'in-forest' haulage, i.e. forwarding and snagging, or truck loading and haulage?



## **9. Regeneration**

Where regeneration requires seed or seedlings to be introduced, there need to be a requirement for maintaining the local genetic integrity. In Tasmania there are mapped seed zones to facilitate this. Something similar is appropriate.

## **10. Machinery wash-down areas and Clean on entry requirements**

It would be helpful if the IFOA could include provision for machinery to be clean on entry to any operation. Where machinery is washed down prior to leaving a site, the wash down area should be recorded so that any weed growth that emerges at that site can be readily located and managed accordingly.

## **11. Firewood collection**

I am uncertain as to what the scientific basis is for restricting firewood collection to 20m from a road. A more helpful approach would be to encourage and facilitate firewood collection in order to take pressure off other areas where it may be problematic. The 20m restriction seems to be an altruistic approach to manage a non-existent problem. Harvesting operations are going to generate a lot of otherwise waste material. Criterion 9 of the Standard requires the forest manager to optimise the utilization of harvested forest products. This needs to be supported for a range of social, economic and environmental reasons. Excessive accumulation of waste material is likely to lead to increased risk of uncontrollable fire.

## **12. Training and competence of all parties**

While training needs for forest workers are described, there is no specified requirements of training and experience for regulatory staff. This should be considered.

**I would gladly participate in any on-going discussions regarding the potential for improvements with the IFOA and regulatory environment.**