

A synthesis of community feedback from Community Information Sessions for the Integrated Forestry Operations Approvals Remake

Prepared for

NSW Government

Prepared by

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Disclaimers

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PURPOSE, BACKGROUND AND CONTEXT

What was the background and what was the purpose of the Community Information Sessions?

Background

The NSW Government is proposing changes to the environmental regulatory framework for forestry operations conducted on NSW public land. In calling for community feedback on these proposed changes, a discussion paper entitled *Remake of the Coastal Integrated Forestry Operations Approvals: Discussion Paper February 2014* was released by the NSW Government on 24 February 2014. The Discussion Paper can be found on the NSW Environment Protection Authority website at:

<http://www.epa.nsw.gov.au/resources/forestagreements/140209IFOARemakeweb.pdf>

Purpose of Community Information Sessions

As part of the consultation process on the Remake of the Coastal Integrated Forestry Operations Approvals (Remake), the NSW Environment Protection Authority (EPA), Forestry Corporation of NSW (FCNSW) and Fisheries Division of NSW Department of Primary Industries – Fisheries (Fisheries), on behalf of the NSW Government, held a series of community information sessions (CIS) in coastal IFOA regional centres to:

- gain stakeholders' understanding of the new draft Integrated Forestry Operations Approvals (IFOA) Remake and proposed legislative amendments;
- seek feedback on the new draft IFOA and proposed legislative amendments; and
- encourage and explain how to provide written comments on the Remake as outlined in the Discussion Paper.

The community information sessions provided an opportunity to engage with interested members of the community, explain the key issues provided in the Discussion Paper, listen carefully to the community's feedback, and encourage the community's involvement in the next steps of the consultation process.

Community Information Sessions – how were they run and what was the agenda?

The community information sessions were held from 12-25 March 2014 in regional centres in NSW within each of the coastal IFOA regions - Batemans Bay (Southern IFOA Region), Eden (Eden IFOA Region), Lismore (Upper North East IFOA Region), Grafton (Upper North East IFOA Region), Wauchope (Lower North East IFOA Region), and Sydney.

The agenda for the half-day community information sessions is provided as Appendix 1.

Each of the community information sessions was facilitated by an experienced and independent natural resource management facilitator – Michael Williams of

Michael Williams & Associates Pty Ltd, who outlined at the CIS that he was engaged by the NSW Government.

The community information sessions were advertised in the Sydney Morning Herald newspaper and in newspapers generally circulating in the areas covered by the coastal IFOAs including the regional centres within which the sessions were held. The EPA also issued a media release before each session.

A key part of the agenda was the opportunity to provide feedback on the IFOA Remake. In regional centres this was done in self-selected small groups and in Sydney as part of a plenary session.

Feedback sessions focussed on participants' views on:

- the overall objectives, scope, framework and aims of the Remake;
- the specific objectives of the Remake – to improve clarity, reduce costs and improve enforceability - including suggestions as to improvements or other approaches to meet the specific Remake objectives;
- the multi-scale landscape-based approach and the degree to which the multi-scale landscape-based approach strengthens or otherwise the protection and management of threatened species;
- the proposed changes to soil and water protection and the degree to which the changes would improve soil and water outcomes during and following forestry operations; and
- ways to improve the flow of information about the IFOAs to the public.

The feedback sessions were based on self-selected small groups each assisted by a small group facilitator knowledgeable of the Remake. Small group facilitators included senior officers of the NSW Environment Protection Authority, Forestry Corporation of NSW and NSW DPI - Fisheries. They were carefully briefed by the independent facilitator in relation to best practice protocols and a process was provided by the independent facilitator to assist in moving through the questions whilst allowing for a free, open and respectful sharing of views. Each small group table appointed a person to scribe the range of views of the individuals at the table and to distil the key points raised during the discussions. These were noted and presented to the plenary group by a non-government participant. Extra notes of the feedback sessions were taken by a NSW government representative skilled in the task and provided to the independent facilitator.

What's the structure and purpose of this report?

As part of his brief, the independent facilitator was asked to prepare a report to NSW Government and to be made available to participants who attended the Community Information Sessions. The report is a distillation and synthesis of the key themes and issues raised at the sessions and has been drafted to provide feedback to NSW Government as it proceeds to the preparation of the draft IFOA upon which further community consultation will take place.

The issues raised by participants have been generally characterized and grouped under a number of major themes developed in the Discussion Paper and on which the small group feedback sessions were focused.

These were:

- Theme 1 – the overall strategic directions of the Remake including objectives, scope, principles, framework and aims;
- Theme 2 – the specific objective of the Remake – to improve clarity, reduce costs and improve enforceability;
- Theme 3 – Increased emphasis on multi-scale landscape-based protection for threatened species and communities;
- Theme 4 – Enhanced soil and water protections; and
- Theme 5 – Future communication and stakeholder engagement in both the next stages of the consultation and once the Remake is in place.

The report does not specify the organisations or individuals who raised the particular views nor does it test the veracity of the perspectives provided. It was the scope, diversity and rationale of participants' perspectives that was of primary interest.

Community Information Session participants

Over 100 individuals and organisation representatives attended the six sessions. Participants at the sessions included:

- NSW forest industry peak body;
- Forest Corporation of NSW staff including senior forest managers, harvest planners and forest ecologists (not included in Table 1);
- National and NSW peak conservation organisations;
- local conservation groups;
- university academics and forest researchers;
- integrated forest companies;
- mill owners;
- harvest companies;
- harvest and haulage contractors;
- mill workers;
- timber suppliers, wholesalers and retailers;
- a recreation organisation;
- a media organisation; and
- many with a more general interest in the management of their public forests.

The number of participants at each of the sessions is outlined in Table 1. NSW Government attendees are not included in the number of participants shown in Table 1.

Table 1: Number of community participants at Community Information Sessions

Location	Date	Participants
Batemans Bay	12 March 2014	10
Eden	13 March 2014	11
Lismore	19 March 2014	27
Grafton	20 March 2014	16
Wauchope	21 March 2014	24

***What did the community say - a synthesis of key outcomes of Community Information Sessions
in relation to draft IFOA Remake - March 2014***

Sydney	25 March 2014	15
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WHAT WAS THE COMMUNITY'S FEEDBACK?

Overall key outcomes

Overall workshop participants provided, not surprisingly, divergent views of the strategic direction of the Remake. Strongest support was provided by those involved in timber harvesting especially support for the Remake's focus on the need for improved clarity of regulations. Concern however was expressed by some forest industry participants about potential cost shifting from NSW Government onto industry.

Conservation group representatives and individuals were more equivocal. Their views ranged from:

- the purpose, objectives and principles of the Remake were generally sound but the current Remake framework was not detailed enough in many areas to provide definitive comment.

to:

- the Remake was inherently flawed due to:
 - its lack of recognition of the impending wood supply crisis;
 - the lack of recognition of contemporary forest management issues and forest values that have emerged since coastal IFOAs were introduced in 2000-2002 such as the impact on wood supply from increased climate variability due to climate change and the increased importance of forests for carbon sequestration;
 - the failure of the previous IFOAs' monitoring system to provide useful information to make judgments about the success or otherwise of the overall regulatory approach since the wood supply agreements and regulatory framework were put in place some 12-14 years ago;

A sole recreation group representative argued that the impact of the Remake on recreational values and recreational users had not been properly considered.

Theme 1 - Perspectives on the overall strategic directions of the Remake including objectives, principles, framework and aims

The IFOA Remake deals with objectives (section 2.1 of the Discussion Paper), key principles that will guide the Remake (section 2.2 of the Discussion Paper), and the framework and aims (section 5 of the Discussion Paper). Taken together these make up the broad 'strategic directions' of the Remake. A number of participants were interested in providing feedback on these broad 'strategic directions' and these comments have been grouped together under Theme 1.

Broadly the Remake makes sense but

In general many participants considered the Remake made sense. The overall objectives especially the requirement to improve the clarity of the regulations was well received by those involved in the timber industry and some conservation interests. As noted above, there were serious concerns from some conservation interests about the fundamental underpinning of the Remake and from others the lack of detail.

Views on the key principle to change from a process driven to an outcomes-focused approach

The change from a largely process driven to an outcomes-focussed framework was generally supported. However some participants noted that there was no robust science to support the assumption that an outcomes-focussed regulatory framework can actually deliver the dual principles of no reduction in high quality timber volumes and no erosion of environmental values.

Context of Remake - inherently flawed

Some conservation participants indicated that timber supplies in NSW are known to be unsustainable and thus given the fundamental importance of this fact, the Remake is only fiddling at the edges – a fundamentally different approach is required to align harvesting to the forest’s real sustainable yield level.

Concern about Remake’s potential impact on timber resource availability

Many forest industry participants raised concerns about the potential impact of the Remake on timber resource availability. They considered there was a possibility of changes to the boundaries of high conservation values within harvesting coupes such as old growth boundaries or the listing of new threatened ecological communities (TEC) that would reduce harvest areas and timber availability. Others argued that boundaries of high conservation values within the forests should be updated and more specifically defined especially with the advent of more precise boundary mapping technology such as Light Detection and Ranging (LiDAR).

There was a general view that the detailed pre-harvest planning of each logging coupe should be maintained.

Significant changes since the IFOAs introduced in 2000-2002 demand a more broadly based review of IFOA

A number of participants argued that the Remake was too narrow in its focus. One participant suggested that there had been such significant changes to the original wood supply volumes including that wood supply contracts have been “handed back” that the whole rationale of the IFOA Remake needed to be based on a re-negotiation of wood supply agreements to reflect these changes.

Incompatibility of Remake’s commitment to “no net change to wood supply and no erosion of environmental values”

A number of conservation interests argued that in delivering the objectives of the Remake - the undertaking to do so with “no net change to high quality wood supply commitments and no erosion of environmental values” (section 2.1 of Discussion Paper) were either incompatible at best or mutually exclusive at worst. Their rationale was based on their view that logging was set at an unsustainable level, on public information outlined in “NSW Auditor-General’s Performance Audit reports - 2009” and that the “Boral agreement had been reviewed”.

Others argued that the commitment by NSW Government to “no erosion of environmental values” should in fact be a principle “to enhance environmental values”.

Not enough detail in parts of current Remake to provide specific comments

Some across the forest industry and conservation spectrum suggested that in some areas such as monitoring it was difficult to provide a view on the Remake as there was not enough detail. "I'm finding it difficult to provide specific comment as the discussion paper is by its nature mostly about principles and a new framework for forest licences - the devil will be in the detail".

The monitoring theme was mentioned specifically as one particularly area requiring greater detail if useful comments were to be provided on the Remake. One comment was made that the Remake was "still too complicated to meet its own objective of improving clarity".

Others outlined that the specific objectives of reducing cost, improving clarity and improving enforceability may be challenging, as there may need to be trade-offs between these objectives. Industry suggested that the Remake still relied upon technical jargon that was difficult to understand and every attempt should be made to keep the revised licence clear and unambiguous.

A comment was made that although focussing on outcomes was commendable, without knowing the detail for each of the intended outcomes, the community could not be confident that the focus will be "on the best outcomes".

Need to all work together to meet the sensible objectives of the Remake

One view of the Remake process generally was that the "original regulations and licences were born of conflict between industry, communities, conservation stakeholders and government - such a setting wasn't the best environment for creation of clear and efficient policies". The call was made for all parties to work together to pool resources, knowledge and expertise to produce a document that achieves outcomes for everyone, that's easy to implement, fit for purpose, and protects the environment using best available science.

More carrot less stick - focus on communication and education

Many in the timber industry suggested that there was a need to educate on-ground timber workers so that they know the rules. One participant suggested "make it simpler – have more clarity, sometimes people don't know if they could be breaking the rules".

Others called for more open and regular communication and face-to-face informal discussions with the regulators to explain, allay misunderstandings and misinterpretations of the licence conditions.

Change the overall approach to reduce overall landscape-scale impact – open up more forests including National Parks to reduce current intensity of harvesting

Some in the timber industry suggested that less environmental impact would result if logging was allowed to be undertaken over a wider area thereby reducing harvest intensity. Others suggested that the intensity of the regulations should be aligned more with the intensity of the logging. A participant argued "the current IFOA is sending NSW Forest Corporation broke, so it was obvious that costs must be reduced and one way to do this would be to have another principle in the Remake that the regulatory burden should be related to the harvesting intensity".

One IFOA size fits all may not be best approach — more local decision making required

A number of forest industry participants suggested that greater local decision making was required or that there should be greater flexibility in the licences to allow forestry workers in the field to make judgements about harvesting and environmental issues.

A number of timber industry participants suggested that if the outcome was clear it should be up to local decision makers and on-ground staff to be given flexibility to determine how to meet those outcomes.

Need for a specific Australian approach to best practice harvest regulations - international benchmarking

In a general discussion during a plenary session, the question was asked if there were any overseas examples where contemporary regulatory frameworks were working well which might provide a useful benchmark for the NSW Remake. A number of university researchers suggested that the Australian forest management context including its business structures, operational scale, forest practices, and forest ecosystem functions were so different from any overseas example that a specific Australian regulatory framework and approach was required.

Theme 2 - Improve clarity, reduce costs and improve enforceability

The key objective of the IFOA Remake as outlined in the Discussion Paper (section 2.1) is “to reduce the costs associated with implementation and compliance and improve clarity and enforceability of the IFOAs”. Feedback on this key objective was one of the foci of the sessions and has been grouped together in Theme 2.

Clarity – it’s what we all want

There was broad agreement for the need to improve the clarity of the regulations – “improving clarity is good and honourable”. Whilst some argued that this did not mean reducing the specificity of the regulations, a few in the forest industry argued the current licenses were “all too vague”. Many noted that increased clarity should lead to increased enforceability.

The forest industry welcomed any improvements to clarity as long as there was no loss of access to timber resources.

We need to reduce costs not shift costs

There was recognition by many participants of the financial challenges facing Forest Corporation of NSW in relation to native forest management and recognition that there was an urgent need to reduce costs – “the current IFOAs are sending Forest Corp broke, so its obvious that costs must be reduced....”. However industry was concerned that there may be attempts to shift costs from Forest Corporation onto the forest harvesting and milling private sector with no allowance for the private sector to pass costs on to consumers. Some participants also noted that increasing clarity should have a commensurate reduction in costs in relation to management of the IFOA.

One suggestion on a way to reduce costs was to have another principle in the Remake that the regulatory burden (intensity) should be related to and consistent with the harvesting intensity.

A concern was also raised about the cost of undertaking the Remake itself so soon after the five and ten-year review of the IFOAs and NSW Forest Agreements.

Concern with cost shifting from NSW Government to industry

There was broadly based industry concern that the Remake may shift costs from NSW Government generally and Forest Corporation of NSW specifically onto industry. Questions were asked by NSW forest industry including peak body, mill owners and contractors such as – “will the savings by NSW Government just get passed on to industry without any chance to recoup any increased costs”? Others argued that cost saving should be shared with the industry without specifying how this might be achieved.

Could reduction in costs potentially increase environmental impacts?

A concern was raised by a conservation participant that based on their understanding gained through public submissions to the 2012-2013 NSW Upper House Inquiry into Management of public land, the (confidential) URS 2023 hardwood timber supply on north coast report may be pertinent to the IFOA Remake assumptions.

There was also a view that any reduction in costs would deleteriously impact on the management of environmental values and that the driver of such impacts was the over-supply of wood volumes in the current Forest Agreements.

Concern with cost of introduction of minimum competencies

Whilst some agreed that, given the more sophisticated approach outlined in the Remake, a system of accountability for contractors via a minimum competency standard may be beneficial, by far the majority of forest industry contractors were concerned about the overall approach to minimum competency standards including:

- minimum competencies could result in complex administrative roles for contractors;
- that legislation might be changed to impose penalties onto contractors through minimum competencies;
- insurance premiums could rise to cover new penalties and new responsibilities; and
- there is no information on the scope that the competency system might include.

Overall there was general concern from those in the forest industry that the Discussion Paper only provides very broad principles in relation to minimum competencies and more consultation with the industry will be required to ensure concerns of forest workers are fully canvassed and addressed.

Improve enforceability

Relationship between monitoring and enforceability

As mentioned above many participants suggested that increased clarity of regulations should result in improved enforceability and on that basis there was broad agreement for the need for improved enforceability. Participants raised

concerns in relation to the efficacy of enforcement given the future monitoring regime remained unclear. Specific suggestions included:

- enforcement could be a problem unless pre- and post-harvest surveys were undertaken;
- NSW Government needs to consider the use of third party auditors of the regulations to give community confidence that compliance was being undertaken rigorously;
- A concern that clearer rules might lead to more penalties for harvesting workers;
- compliance is very costly and currently compliance is not delivering much so the new IFOA has to work hard to make sure compliance is actually delivering social, economic and environmental benefits;
- costs of compliance are blowing out and underscores the need for a remake where clarity and cost reductions for the whole of the native timber industry are delivered; and
- timber workers want to do the right thing but need help and education to assist in compliance management.

Remake should provide a framework for transition to Forest Stewardship Council certification

A number of issues were raised in relation to certification with differing views advanced including:

- the need for the Remake to better align with the Australian Forestry Standard;
- the need for the Remake to align with the internationally recognised Forest Stewardship Council (FSC) certification;
- the need for the Remake to be more aligned with the Ecologically Sustainable Forest Management principles and practice.

Theme 3 - Increased emphasis on multi-scale landscape-based protection for threatened species and communities

The Discussion Paper (section 7) identifies a proposal to increase emphasis on multi-scale landscape-based protection for threatened species and communities. Participants were specifically asked about the degree to which this approach strengthened or otherwise the protection and management of threatened species and communities. Feedback on this component of the Remake is grouped under Theme 3. There was no feedback on threatened fish.

Context – the relationship between Ecologically Sustainable Forest Management and conservation target shortfall

A number of conservation participants provided a range of contextual analyses that they considered to be vital to the consideration of the Remake in relation to threatened species protection. It was argued that there was a need to understand that during the Comprehensive Regional Assessment and Regional Forest Agreement negotiation process that there had been a range of modelling projecting how different forest types and how much of each were required for the persistence of threatened species, and that some conservation targets were not met within the formal reserve system in the signed-off Forest Agreements. It was outlined that the rationale for the introduction of the Ecologically Sustainable Forest Management principles underpinning the Forest Agreements and

particular IFOA conditions was to provide strict prescriptions in relation to the protection of certain forest values including threatened species and communities due to this formal reserve conservation target short fall. These participants argued that if there was going to be a reduction in “prescriptiveness” (specific ESFM and IFOA prescriptions for threatened species management at the coupe-scale) then there needed to be a commensurate increase in landscape-scale protections. The question was posed if there was going to be a process to allow for this, in line with the Remake’s objectives and how would the trade-off happen.

Need for clear articulation of the benefits of a multi-scale landscape-based approach

A number of participants argued that there was no scientific rationale advanced as to why a multi-scale landscape-based approach would deliver the threatened species protection outcomes outlined in the Discussion paper. They argued that the Remake should have included a detailed literature review of the multi-scale landscape-based approach to understand the opportunities and threats that such an approach would deliver for biodiversity conservation generally and protection of threatened species and communities specifically.

Others argued that the Discussion Paper was too vague to make useful comments in relation to such a vital part of the Remake. One participant was specifically concerned about the way to interpret the phrase “large ecological reserves” in the context of the first paragraph in section 7.2 (page 22 of Discussion Paper).

Benefits and disbenefits of multi-scale landscape-based approach

A range of benefits and disbenefits of multi-scale landscape-based approaches to the management of threatened species and communities were advanced including:

- landscape scale reflects that many significant ecosystem functions are operating at much larger scales than just the coupe scale. These include climate change, fire regimes and feral animals – “Landscape scale has got to be a better approach than coupe by coupe”;
- landscape-based protection is a “buzz word” but does have scientific roots – one needs to get into the detail to see if it will deliver;
- the Remake is not aligned with contemporary and emerging landscape scale forest management issues especially the impact of climate change on forest ecosystem dynamics including future sustainable yield;
- the ecosystem services of carbon sequestration have not been taken into account in the Remake;
- local environment conditions still needed to be taken into account;
- Bell Miner dieback has affected many areas of public forests post harvest. Post harvest management prescriptions and/or regulations possibly in the regeneration regulations are required to manage this significant new threat to forest health;
- the Remake needed to reflect the importance of connectivity conservation theory and management;
- concern regarding recent decisions to use forest by-products for co-generation;
- Federally listed threatened species are different from NSW Government threatened species – how will this difference be taken into account in the new IFOA?

- there is a need to clarify boundaries of threatened ecological communities (TEC). TEC creep diminished areas available for harvesting which in turn leads to criticism of the timber industry for over-harvesting;
- the forest industry needs to engage with the NSW Scientific Committee (established under the NSW *Threatened Species Conservation Act*);
- given that climate change was already here, the old threatened species surveys may not be indicative of current and future threatened species habitat requirements. Therefore need to resurvey for threatened species. Can't predict where future threatened species habitats might be;
- concern about the silos of government, would like to see whole of government approach to threatened species issues e.g. Koalas;
- Koalas should have whole of landscape regional plan/approach to management;
- landscape approach for fire management should also be whole of government; and
- if you want a landscape approach then one needs to look at the key threatening processes that impact a given threatened species. Impacts are broader than just harvesting.

A number of examples were given by a participant of multi-scale landscape-based approaches. These included:

- the Tasmanian Forest Practices Authority (FPA) has graded hollow-bearing trees to determine how to harvest around them and retain them permanently - a sound example of a landscape-based approach.
- in Victoria in the tall mountain ash forests of the Central Highlands, surveys for Leadbeater's possum assess presence or absence and if Leadbeater's possum is not found, harvesting is allowed to continue – a poor example of a landscape-based approach.

The participant's view was such examples suggest that the "devil is in the detail of where and how a landscape-based approach is applied".

To achieve landscape-scale you need to make Private Native Forest regulations and IFOA for public forests more aligned

There were a number of participants who argued for the need to:

- make Private Native Forest regulations and IFOA more aligned if the rhetoric of landscape-scale approach was to be realised – "there should be the same rule-set for public and private forests to ensure there is a truly landscape approach"; and
- the same standard of regulations applying to State Forest (IFOA) should also apply to National Parks especially in relation to road maintenance and erosion management.

Use of an expert panel makes sense

A number of participants indicated that an expert panel to advise on landscape-based approaches to the management and monitoring of threatened species and communities was sensible and welcomed the suggestion.

Monitoring

Monitoring was discussed in a number of contexts and a broad range of issues was advanced. These included:

- monitoring is vital to understand if outcomes are being achieved;
- there is a need for a synthesis and analysis of the 14 years of IFOA monitoring data;
- a rigorous monitoring methodology will need to be developed if all the outcomes being canvassed by the Remake are to be realised;
- there needs to be a fundamental review of the current IFOA monitoring methodology;
- the use of an expert panel is to be commended;
- current monitoring methodology focuses on determining absence. It would be preferable to assume presence in known habitat types and have multi-scale protection frameworks to manage these habitats and their threatened species;
- the data available from the current IFOA monitoring approach are not useful as they have not led to an adaptive management approach. Monitoring really needs to be much more efficient at informing an adaptive management framework. Assess the Victorian monitoring program – this works well;
- scale of monitoring to be multi-scale and include public and private lands;
- many communities see local site surveys as important;
- focus more on fauna – that is where the public interest is;
- there is still a need for monitoring pre- and post-harvesting and the harvest planning at coupe scale must be continued;
- monitoring is not coordinated at the landscape scale – monitoring being undertaken in state forests should be consistent and be able to be used at a multitude of scales;
- there is a role for universities to assist in the monitoring strategy;
- monitoring methodology should be peer reviewed;
- monitoring needs to incorporate targets and thresholds to indicate when intervention is required before harvesting rather than after the impact from harvesting has occurred;
- monitoring needs to be clear on what it is measuring – need to check that the actual fauna is persisting – it's not good enough just to monitor habitats or just surrogates of threatened species;
- three million dollars have been assigned to undertake Koala surveys. Information is due at end of 2014 - the IFOA Remake process should include this important monitoring data;
- concerned that of the funded monitoring projects (TECs & Koalas), the TEC project is mentioned (in the Discussion paper) but the Koala project is not mentioned. Progress report on the Koala mapping project should be made publically available; and
- concerned that there is and continue to be a lack of staff to monitor harvesting on the ground.

Deployment of new technology – it's a good idea

There was broad support for the use of new technology such as LiDAR. Accurate stream mapping was seen as vital if riparian areas and filter strips were to be mapped accurately. The point was also made that harvest machinery had improved and that regulations such as design of whoa-boys and width of buffer

strips in relation to the extended reach of harvest machinery should also be reflected in the Remake.

Regeneration

Feedback on the current IFOA's unenforceable regeneration requirements and the Remake's proposed requirements for Forest Corporation of NSW to meet specified regeneration standards focussed on diverse views of the role of fire and divergent views on the preferred mix of species post harvesting. These views included:

- the need to be very clear on regeneration objectives especially what species mix should regenerate;
- the pros and cons of regeneration of pre-existing species composition and structure or using disturbance including fire management to ensure a different suite of species that may increase wood supply in future and or have less susceptibility to threatening processes such as Bell Miner Dieback;
- a view that there is no magic prescription to get regeneration right;
- regeneration needs exact mapping before logging operations so that the regeneration species mix can be managed effectively; and
- regeneration too required mapping at a landscape scale if the multi-scale landscape-based approach is to be useful to inform desired management outcomes.

Burning as a regeneration tool provided for some lively debate with a focus on the prevention of intense fires and using fire as a landscape management tool as well as a regeneration tool. Specific mention was made of the need to manage fire to protect habitat and recruitment trees and the need to monitor the results of regeneration burns to ensure the retention of habitat and recruitment trees.

Theme 4 – Enhanced soil and water protections

The Discussion Paper outlines proposed changes to the soil and water protection components of the IFOA (section 8) including proposals to:

- reduce number of and duplication between licences;
- reduce prescriptive nature of licences so that they are clear, implementable, outcomes-based and enforceable; and
- standardise roading, streaming and wetland protection across all licences and regions.

Feedback on this component of the Remake is grouped under Theme 4.

Practical management issues

The theme of achieving and assessing compliance with best practice soil and water protection focused mainly on practical management issues. The range of views included:

- new technology was vital to improving soil and water management outcomes;
- a more outcomes focus should provide for greater flexibility in the design of drainage structures to allow for specific site issues and soil types;
- there was a need to review current requirement for specific soil types as some existing distances between erosion management structures are too great and need reducing; and

- it is difficult to get monitoring information on the relationship between soil and water management and biodiversity results.

Concern and objection to the steep slope logging trial

A number of conservation participants raised the steep slope logging trial issue raised in section 8.3 of the Discussion Paper. In some sessions concerns were raised and in others a more fundamental objection was advanced to a steep slope logging trial. Objections were focussed on the basis that steep slopes have always been protected and were countered as part of the informal reserve network when the Wood Supply Agreements were being negotiated as part of the Forest Agreements. It was argued that if the trial were to be approved there would be an overall reduction in areas protected within informal reserves.

Concerns focussed on:

- how the steep slope logging trial aligns with the objective of no erosion of environmental values;
- there was evidence that the Bega River has silted up due to forest removal;
- more intense rainfall events are predicted with climate change – the increased risk of steep slope harvesting on down stream siltation is too great;
- the buffers for riparian areas especially the 10m first order stream buffer width would need to be reassessed given the increased slope angles if steep slope logging trial were to be approved;
- the link between the removal of silvicultural practices from the IFOA and the steep slope logging trial.

Theme 5 – Improved communications and community engagement

The Discussion Paper (section 11) outlines how the Remake is proposing to review the requirements in relation to information collection and availability with a view to improving the flow of information about the IFOAs to the public. Feedback on this component of the Remake is grouped under theme 5.

Importance of transparency and public availability of IFOA related information

Given much of the information about proposed changes to the way information is made available to the community will be released in Stage 3 of the Remake, feedback was less focussed on this theme than the other themes.

Participants who discussed this issue generally agreed that a more transparent approach to native forestry information was important as was the need for information to be more publically accessible. There was also a call for the monitoring information to be made available to the public in a form that can be analysed.

APPENDIX 1: AGENDA

Remake of the Coastal Integrated Forestry Operations Approval (IFOA) Community Information Session Agenda

Objectives of the community information session

- to provide information on the key elements of the coastal IFOA remake
- to seek feedback from those attending the session on the coastal IFOA remake
- to facilitate written submissions on the discussion paper

Independent Facilitator

Michael Williams - Principal Michael Williams & Associates Pty Ltd - Sydney

Agenda
Registration
Welcome, purpose and context of session
Presentation by NSW Government - Background, key issues and rationale for the coastal IFOA remake
Tea and coffee break
Small group workshops to address key issues
Presentations of small groups' key issues
Presentation by NSW Government - How to make a written submission
Next steps
Synthesis and key outcomes of the workshop
Thanks and close