

North Coast Forests' Taskforce



Remake of the Coastal IFOAS
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Submission to the Remake of the Coastal Integrated Forestry Operations Approvals (IFOA) Discussion paper – February 2014.

This submission, in response to the public consultation, is made by the North Coast Forests' Taskforce (NCFT). The NCFT is an industry based group comprising representatives from the Australian Forest Products Association, the NSW Forest Products Association, the Institute of Foresters of Australia, Australian Solar Timbers, Hayden Timbers, Boral Timber, AE Gibson and Sons, Kopper's Wood Products, Machin's Sawmill, consultants to the Industry and representatives from the broader community.

The mission of the Taskforce is to substantially improve community understanding of, support for and confidence in, the environmentally sustainable management of North Coast forests and their timber products.

The NCFT wishes to make the following points:

1. The NCFT supports the concept of a single, integrated IFOA for coastal NSW on the basis that it will:
 - I. reduce the costs of implementation and compliance and improve the understanding of and enforceability of IFOA conditions and
 - II. create a balance between social, economic and environmental values.
2. The NCFT agrees with the NSW Government's aims of delivering these objectives without any net change to wood supply and the maintenance of environmental values.
3. The NCFT agrees with the NSW FPA that the current coastal IFOAs are process-focused and have not allowed forestry operations to keep pace with changes in technology, logging practices or best regulatory practice. There are over 2000 conditions in the current coastal IFOAs, comprising more than 350 pages. Rather than being integrated, they consist of four separate licences - general operating conditions, an Environment Protection Licence (EPL), a Threatened Species Licence (TSL) and a Fisheries Threatened Species Licence (FL). This represents a considerable constraint on both efficiency and productivity

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As such, the NCFT supports the intention of the proposed coastal IFOA as a means of integrating the regulatory regimes for environmental planning and assessment, the protection of the environment, water and threatened species conservation thereby improving the ease of implementation by reducing the number and complexity of conditions.

4. The NCFT believes that the IFOA must ensure a balanced outcome of socio-economic factors and environmental values
5. The NCFT welcomes the landscape protection for threatened species and communities. However as previously mentioned, reassurance is sought that Threatened Ecological Communities (TEC) and Endangered Ecological Communities (EEC) will not be systematically expanded as a method of further eroding the area available for harvesting nor additional restrictions on other land tenures.
6. The NCFT recommends a system of substituting an area removed from harvesting as a result of newly established TEC and EEC with another area for harvesting.
7. The NCFT request that the IFOA Review also include broader environmental values such as:
 - Carbon sequestration in forest growth
 - Carbon storage in timber used for construction and infrastructure
 - Timber as a low energy building product in comparison with concrete, steel, plastic, aluminium
 - Woody biomass as a preferred energy source than fossil fuels or high energy infrastructure of other renewables.
8. Compliance monitoring and enforcement appears to rest with the EPA. The NCFT questions whether the EPA has the necessary skills, qualifications or experience of forest management and the environmental context within which forestry operations occur.
9. The Australian Forestry Standard (AFS), certified under the Program for Endorsement of Forest Certification, meets all the necessary requirements for forest regulation in NSW. AFS is managed under independent third-party auditing schemes and as such the NCFT contends that there is no need to create such a complex over-riding regulation, as proposed in the 'Remake' document. Accordingly AFS certification should be deemed to satisfy parts of the IFOA. Similarly with biodiversity certification under the Threatened Species Act
10. The NCFT believes that the NSW Government should as a priority, utilize the opportunity for the introduction, management and maintenance of a landscape scale strategic forest monitoring system that is designed using sound scientific principles for use across all land tenures
11. The NCFT supports the submission made by the NSW Forest Products Association

Yours Sincerely

Trevor Sargeant

Acting Chairperson



2 April, 2014

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