

5 April 2014

Remake of the Coastal IFOAs
Environment Protection Authority
PO Box A290
Sydney South NSW 1232
(e) ifoa.remake@epa.nsw.gov.au

Submission — Remake of the Coastal Integrated Forestry Operations Approvals Discussion Paper

The Australian Forest Products Association (AFPA) welcomes the opportunity to comment on the Remake of the Coastal Integrated Forestry Operations Approvals Discussion Paper.

The AFPA is the peak national body for Australia's forest, wood and paper products industry. We represent the industry's interests to governments, the general public and other stakeholders on matters relating to the sustainable development and use of Australia's forest, wood and paper products.

This submission is intended to complement a more detailed assessment of the Remake of the Coastal Integrated Forestry Operations Approvals Discussion Paper prepared by the NSW Forest Products Association (NSW FPA).

AFPA commends the NSW Government on undertaking a comprehensive review of the coastal IFOAs, recognising the need to overhaul the current process. We favour the move away from a prescriptive to an outcome based regulatory approach to forest management. This is seen as an opportunity to introduce a modern regulatory framework involving a more integrated management model with a simplified and streamlined structure.

AFPA join the NSW FPA in endorsing the overall intent, structure and aim of the proposed new IFOA framework. We strongly support the objectives of the IFOA

remake to reduce costs associated with implementation and compliance and improving the clarity and enforceability of the IFOAs.

AFPFA sees benefits in proposed changes to the IFOA that involve:

- moving to a single integrated IFOA covering all coastal Forest Agreement regions
- focusing on specified environmental outcomes and standards, rather than on procedure based administrative conditions
- splitting the regulatory conditions into protocols and guidelines
- shifting away from the direct supervision to minimum competencies for forest contractors.
- incorporating landscape scale management principles to enable them to be more effectively integrated with other natural cycles of disturbance and recovery.

However, we are also concerned about further reductions in the area available for timber harvesting and the ability to meet future wood supply commitments. It is noted that the current system does not offer anywhere near the same level of protection for social and economic interests as it does to the environment and we stress that the IFOA remake must better align and balance social and economic considerations with environmental value.

AFPFA would like to reiterate the key recommendations of the NSW FPA, with a view that they should be given full consideration in the drafting of the remake of the IFOA. These recommendations are:

1. That Forest Agreement indicators designed to maintain and enhance economic and social interests be reviewed, expanded and strengthened to provide comparable protection for the timber industry and timber dependent communities to that provided for the environment by the new IFOA.
2. That further consideration and discussion occur about the inclusion and regulation of small scale, low risk and one-off activities prior to making a final decision about whether the Environment Protection Licence is always turned 'on'.

3. That the new IFOA:
 - i. empowers those who have direct responsibility for upholding standards and delivering outcomes.
 - ii. be designed in a way that rewards good performance by reducing regulatory burdens.
4. That the NSW EPA clarifies how it proposes to regulate forests operations if they were to occur on State forests in the Central (Sydney) Region.
5. That it be publicly acknowledge and explicitly stated that:
 - i. there is a deliberate intention in the new IFOA not to cover key threats to native forest values, namely:
 - altered fire regimes and mega fires;
 - pests, weeds, diseases;
 - landuse change, and;
 - climate change.
 - ii. When assessing and evaluating the effectiveness of outcomes under the new IFOA it will be necessary to look beyond the regulatory boundaries defined by the IFOA to take account for key threats to environmental values which operate at a whole of landscape scale.
 - iii. the timber industry will not have its economic interests eroded (without being duly compensated) if in the future it is deemed necessary to introduce additional regulatory controls to mitigate key threats to native forest values.
6. That it be publicly acknowledged that:
 - i. the effective application of landscape scale management principles will:
 - a. enable human-induced disturbance activities (i.e. harvesting and burning) to be better integrated with other natural cycles of disturbance and recovery.
 - b. help mitigate landscape scale threats.
 - ii. the existing regulatory and operating constraints imposed on the Forestry Corporation do not provide sufficient flexibility for landscape scale principles to be applied in practice.

- a. To achieve landscape scale protection for threatened species and communities there needs to be greater flexibility to distribute operations in space and time.
 - b. If landscape scale principles are to be effectively applied more productive forest area needs to be made available to the industry (through either a reduction in site specific regulation or an increase in State forest).
- iii. economic and social interests are at risk of being eroded by the application of landscape scale management principles in the absence of special protection provisions.
 - a. Industry protection provisions are specifically needed to ensure that the TEC mapping project does not erode economic and social interests.
 - b. General regional level indicators are needed to track and protect economic and social interests.
7. That the EPA incorporates provisions within the new IFOA which enable the removal of 'in built' buffers where it can be demonstrated that technology has improved the accuracy of the identification of protected area boundaries.
8. That high priority be given to 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.

If you have any questions about AFPA submission please contact me on 02 6285 3833 or at peter.grist@ausfpa.com.au.

Yours sincerely

Peter Grist
Manager – Resources