

From: [REDACTED]
To: [_ALL-EPA-Forestry-IFOARemake](#)
Subject: Submission on Coastal IFOA
Date: Sunday, 6 April 2014 5:33:42 PM
Attachments: [IFOA Submission.docx](#)

Please accept my attached submission.
I have included it as a word document and in the body of the email.
Yours faithfully
Jane Judd

IFOA Submission

Thanks you for the opportunity to comment on the proposed changes to the coastal IFOAs.

I do not live on the coast but was involved in the development of the Brigalow and Nandewar IFOA as a result on my membership of the Namoi Community Conservation Areas Advisory Committee.

While there are good arguments in favour of some of these changes, I have considerable concerns about many others. They appear to have little to do with bringing all licences into line and ensuring good environmental outcomes. I fear in fact that the whole process has been precipitated by demands from the logging industry to access previously unavailable timber. The term "introduce greater flexibility" for the industry appears to be code for make it easier for industry without guaranteed parallel improvements in environmental protection.

This can be traced back to a Forestry Corporation which had never determined the actual extent of its resource at the time the original wood supply agreement was negotiated and thus agreed to provide more timber than was actually available in reserves. The present guaranteed rate of supply is far greater than the rate at which it can be sustainably harvested and rather than increasing availability we should be looking at winding back the level of harvesting, if only to ensure that there is timber available for future generations.

Justifications for the changes include the folding together of a number of different licences. When aligning these different requirements for the same features, it is essential that the conditions remain as strong as the strongest licence, not as weak as the weakest.

When reading the comparison of the proposed changes with the current arrangements, I was disturbed by regular statements that "the current requirements are unenforceable". I should like to know the reasons for the

unenforcability. If it is lack of resources then it should be realized that any changes to requirements will also require sufficient monitoring to ensure compliance.

By changing the focus from process to outcomes does not necessarily improve environmental outcomes. By waiting for the outcomes it will be too late. Good outcomes depend on good process. For example, the proposed changes apparently remove restrictions on intensive logging operations and clearfelling.

I do however, welcome proposed changes such as requiring minimum competencies for forest contractors, and the enforcement of stronger penalties.

Apparent weaknesses in the current threatened species approach will not be addressed by the proposed landscape-based protections. While-ever there is the potential to allow logging on greater slopes, this will not lead to improved outcomes but to increased fragmentation as the current connectivity between catchments, provided by ridgelines, is reduced.

Good, independent pre-harvest surveys are still essential to maintain protection and will be required for certain species anyway. The mere exclusion of particular trees from harvest is not a means of protecting landscape.

Threats to sustainability are not adequately addressed. Only Bell Miner Assisted Dieback is considered in detail. Increases vehicle access and increases in tracks leads increasingly to weeds, pest and pathogen incursions. These are not covered except through reference to the Rural Lands Protection Act 1998. The provisions within this act may not be suitable to provide sustainability for areas that have important conservation values. There is also dependence on what appears to be an increasingly toothless EPA.

In Chapter 9, the plan to increase the use of LiDar, Geonet and GPS is an excellent one, and the apparent exclusion of the use of improved mapping technologies should never have happened. It should not however be used as an excuse not to survey and ground truth the results.

There are also opportunities for the use of improved technologies in extraction methods to harvest individual trees without collateral damage. From my own observations in New Zealand, logging on the steeper slopes using cables leads to clear felling, increased erosion and water pollution.

In Chapter 10, the term Strategic Environmental Monitoring Framework seems to imply the use of Strategic Adaptive Management as has been proposed for the

Brigalow and Nandewar forests. This should not just be monitoring and commitment to change. It should also include other aspects of the process such as the pre-implementation action of having all stakeholders present to discuss what the expected outcomes will be, not just 'consultation' by this present process. It should also include learning and the freedom to cope and adjust to unexpected results. Monitoring must be long-term. The entire process needs to be ongoing and completely transparent, acknowledging that the stakeholders include more than just the industry and the corporation. The original formation of CCACs in the Brigalow decision was a good start which Forestry Corporation seemed unwilling to engage with and which have since lapsed.

Yours faithfully

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