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**Regarding Discussion Paper: Proposed “Remake” of IFOAs.**

Operations in NSW State Forests have been devastating biodiversity and catchment values at great cost to the public purse for decades. The ecological and economic deficit has been especially severe and especially obvious since the advent of “integrated harvesting” to exploit new markets for pulpwood in the 1980s. It has been inherent in the culture of the agency to serve the interests of the likes of Boral with a tenacity quite remarkable, by agency men and women presumably not materially benefitting from such contemptuous disregard for the science of sustainable forestry or the public interest. That the public's forests have virtually been in the possession of private and significantly overseas commercial interests has been reflected in the fact that the agency of these interests actually named itself the forests themselves – the Forestry Commission became State Forests of NSW, then ForestsNSW – and now it is the Forests *Corporation*. It used to greatly annoy me, having to write “State Forests of NSW” meaning the agency, not our public forests.

Notwithstanding statutory requirement to protect “flora and fauna” as custodian for the public and future generations, the Agency's management was based on “maximum utilisation” and minimal prescription to protect biodiversity. Their defence of what was virtually open-slather was fierce and without scruple. Finally and belatedly pressure and Court decisions led to some areas and some values being protected, and by the mid-1990s prescriptions and some semblance of regulation were introduced, albeit evidently reluctantly. Lack of political will and Agency resistance resulted in inadequate prescriptions, only token regulation, and consequently very poor compliance. Operations continued to be dominated by low value product in most management areas as sawlog resource dwindled, and Agreements to supply grossly unsustainable volumes meant that total removals, of sawlog and pulp, have been huge.

Constraints on logging intensity in coastal forests have now been weakened further to such an extent that forests already logged far in excess of sustained yield have been degraded by operations at even higher intensities, fatal to species protection or any remotely credible pretence of sustainability.

All this is simply factual history, established and documented in detailed Reports and Submissions by environment groups, such as North East Forest Alliance in particular.

Now it is proposed to: remove prescriptions limiting logging intensity altogether; to harvest areas previously excluded, and to re-log areas already harvested at grossly unsustainable levels; to further weaken species specific prescriptions, "simplify" some and remove some altogether; to return to the old days of no pre-logging surveys, as is the case in Private Native Forestry; to replace some prescriptions with unenforceable guidelines drafted by Forest Corporation themselves; to remove some non-logging activities affecting forests, from any regulation at all; to allow grazing to continue; to allow logging on slopes even steeper than 30 degrees, when there is good evidence 30 degrees is too steep; and to do away with erosion mitigation prescriptions.

This proposed "remake" of the IFOAs is breathtaking in its hypocrisy, its blatant dishonesty in seeking to pretend measures will at the same time be more efficient, flexible and save money, and also, somehow, "better protect" threatened species, habitat, catchment and other values.

This is simply asserted, just *how* is not explained. Landscape-based measures means "identifying and protecting forest features utilised by a number of different species, regardless of whether a species is observed there". Findings of studies as to species' requirements, and what we know of declines in the status of species and populations, show existing prescriptions for habitat protection are inadequate – and moreover, they are routinely ignored - and ignored with impunity, because virtually unregulated. So any genuine impetus to improve the IFOAs would comprise very significant evidence-based prescriptions which would be more stringent than those existing, drafted by experts, and strictly enforced.

"The licence will require minimum thresholds of hollow-bearing trees and recruitment and feed trees to be met at a local landscape scale to ensure adequate shelter and food resources are maintained or enhanced for threatened fauna species."

What does this mean? What are the new proposed prescriptions for hollow-bearing and recruitment trees? What does "local landscape scale" mean? What is here which is meaningful, to comment on? If prescriptions do not take account of species' presence, how is it to be determined, what prescriptions to apply? Will prescriptions be everywhere the same? Will retention rates take account of forest type? Will they provide for the requirements of the range of hollow-using fauna

likely to occur? Requirements as to size, position in the landscape and so on?  
How would retained trees be distributed across this "local landscape" ?

"The landscape approach aims to ensure that these important habitat features are retained and protected as part of the general conditions of the licence at each site and across the broader landscape, to allow threatened species to survive and avoid harm from forestry operations. "

OK, so are we to genuinely apply such a criterion, and accepted criteria such as sustained yield, and require management which recognises the primacy of ecological values and processes, of recovering and protecting the structural integrity of our public forests, and recognises uncertainties inherent in global warming, and require management which is responsible and precautionary in the long-term public interest?

If so, then I'd say, in response to this proposal to "remake" the IFOAs, that we should get rid of them altogether, and we should cease commercial harvesting operations in State Forests, to reap the manifest ecological and economic benefits of protecting our public forests.

Government should as a matter of priority seek advice and act decisively to get out of Wood Supply Agreements, which were signed on the basis of dishonest, false timber yield estimates supplied to the Cabinet, of the Government at that time, and which are clearly not compatible with responsible management in the public interest, of precious public assets. Whatever it takes, do it.

Barrie Griffiths.