Remake of the Coastal IFOAS Environment Protection Authority, Level 12 PO Box A290 Sydney South NSW 1232

Email: ifoa.remake@epa.nsw.gov.au

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

Thank you for the opportunity make this submission in response to the public consultation. I support the following paragraphs.

- 2.2 The scope of IFOA remake is clear and valuable. The EPA should strive to achieve consistency across the state.
- 4. The NSW forestry planning framework is complex and not user friendly which causes confusion and leads to perverse outcomes. Any stream-lining and clarity that can be provided to the IFOA remake is welcomed.
- 4.3 Clarity for regulators and those engaged in forestry operations is long overdue and rationalization to one all-encompassing licence is welcomed.
- 5. The proposed aims of the IFOA structure are commendable and harmonizing regulatory conditions to one licence is welcomed.
- 7.1 Weaknesses in managing impacts on TS and communities Surveys are costly for specific species and do not end up protecting much more habitat than is covered under general landscape reservations. Numerous examples given. Threated ecological communities not currently covered in IFOA.
- 8.2 Proposed changes to soil and water protection components of IFOA will reduce the number of licence conditions, remove duplication and reduce the prescriptive nature which will lead to greater clarity and standardization.
- 8.3 A steep slope harvesting trial is proposed and supported.

The world's demand for timber is not going to reduce. It's better if Australia supplies as much timber as possible to ensure it is done sustainably, unlike places where it is done without regulation.

Ray Camilleri

Halfway Creek, NSW 2460

Date: 1 April 2014