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

**John P.Browne Pty. Ltd.**

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wish to make this submission in response to the public consultation.

The IFOA contains the conditions that Forest Corporation NSW and its harvesting contractors must comply with in order to conduct forest operations and deliver wood to the native forest industry. This remake as outlined in the discussion paper will reduce complex duplication of regulation that is costly to administer and implement and should deliver the best environmental outcomes and efficient forest production.

- 2.1 The objectives of the IFOA remake are clearly stated along with a commitment to “no net change to wood supply and no erosion of environmental values”.
- 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.
- 5.1 The remake IFOA and licence structure to reduce prescriptions, provide clarity to intent, contains best-practice protocols and guidance material, introduces greater flexibility, is outcome-based, has a landscape focus, is easier to implement and improves enforceability is welcomed. The landscape approach is utilized in Tasmania, Canada and the USA and the protocols are the same for all tenure.
- 5.2 Regulatory approach under the new coastal IFOA is supported

- 5.3 The proposal for the introduction of minimum competencies for forest contractors is supported for reasons of efficiency and continuous improvement.
6. The areas to be covered by the IFOA are noted.
7. Landscape-based protection for threatened species and communities is noted and 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. Threatened ecological communities not currently covered in IFOA.
  - 7.2 Move to multi-scale landscape-based protection for TS and TC  
General licence conditions will provide for strategic landscape scale habitat protection to include TS protection provisions within the broader landscape.
  - 7.3 Developing the licence framework for Threatened Species and Communities  
The effective application of landscape scale management principles is welcomed and will enable disturbances by harvesting and burning to be integrated with other natural disturbances and subsequent recovery.
  - 7.4 Bell Miner Associated Dieback  
This is a growing problem in forest/park areas which requires further research and implementation of programs to reduce the infestation of psyllids and subsequently control the rapid population growth of Bell Miners.
- 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.
- 9.1 LiDAR and Geonet technologies will provide more accurate stream mapping and boundary marking should assist in removing the "in-built buffer" system.
- 10 A new strategic environmental monitoring environment 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

Signed

Date