

Standard Operating Procedure



IFOA/CIFOA Complaints – SOP

This SOP describes the process for recording and reporting of complaints made under the CIFOA, Brigalow Nandewar IFOA, South-Western IFOA and River Red Gum IFOA.

Forestry Corporation of NSW (FCNSW) provides a separate process for dealing with stakeholder complaints and representations outside of those made under the IFOA's. Our approach to these is outlined in the [Stakeholder Engagement Policy](#) and processes for reporting and recording of these are documented in the [Complaint handling procedure](#).

What is a complaint under the IFOAs?

Complaints are defined separately under the Coastal IFOA and Brigalow Nandewar IFOA, South-Western IFOA and River Red Gum IFOA as follows;

Coastal IFOA

FCNSW have interpreted a complaint as one that:

- alleges actual harm caused by a forestry operation¹; or
- alleges non-compliance with a condition of the CIFOA associated with a forestry operation.

Harm in relation to fauna, flora and environment is defined²as:

- **Animal:** where an animal is killed, injured or captured, but does not include harm by changing the habitat of the animal. An animal is any vertebrate, or invertebrate in any stage of biological development, not just threatened or protected species. An animal does not include humans.
- **Plant:** the picking ³of a plant that is of a threatened species, is part of a threatened ecological community, or a protected plant.
- **Fish:** to take, injure or otherwise harm a fish, but does not include harm by changing the habitat of the fish.
- **Environment:** any direct or indirect alteration of the environment that results in degradation the environment and, without limiting the generality of the above, includes any act or omission that results in pollution. Generally applies to a pollution event.

¹ Forestry operation refers to any harvesting, roading, forest products or burning operation conducted under the CIFOA

²As defined in the *Biodiversity Conservation Act 2016*, the *Fisheries Management Act 1994*, the *Protection of the Environment Operations Act 1997* and the Coastal Integrated Forestry Operations Approval (Conditions and Protocols).

³ includes gather, take, cut, remove from the ground, destroy, poison, crush or injure the plant or any part of the plant

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- **Marine vegetation:** gather, cut, pull up, destroy, poison, dig up, remove or otherwise harm the marine vegetation, or any part of it, but does not include harm by changing the habitat of the fish or marine vegetation.

Condition 31.1 of the CIFOA states that FCNSW must:

- (a) Record all complaints that it receives that allege harm or non-compliance with a condition of the approval caused by forestry operations in the complaints register.
- (b) All complaints must be recorded within 5 days. The complaint should be responded to and closed out in a practical and reasonable timeframe.

Brigalow-Nandewar IFOA, South Western Cypress IFOA and River Red Gum IFOA

FCNSW have interpreted a complaint as one that:

- alleges water pollution has resulted, or may have resulted, from a forestry operation; or
- alleges non-compliance with a condition of the IFOA's associated with a forestry operation.

Condition 305 (Brigalow-Nandewar/South Western Cypress IFOA) and Condition 234 (River Red Gum IFOA) states that FCNSW must keep a register of complaints where:

- Water pollution has resulted (or may have resulted) from the carrying out of a logging operation⁴ or ancillary road construction in the Region, or
- A term of the EPL has been (or may have been) breached in, or in relation to, carrying out a logging operation or ancillary road construction.

What is a *not* complaint under the IFOAs?

A complaint in relation to a general neighbour or land management issue, discussions held with stakeholders during planning, a general statement opposing native forest harvesting or internal or contractor interactions is not considered a complaint under the IFOAs. Refer to Appendix 1 for examples and consider the need to manage these in accordance with the [Complaint Handling Procedure](#).

Recording of complaints

ALL complaints which fit the definition of a complaint under this SOP MUST be recorded in the HFD Complaints Register, which is accessed through [Plan Portal](#).

The following information must be recorded in the Complaints Register within five (5) days of being received:

- Date and time of the complaint
- Method by which the complaint was lodged
- Name, address and telephone number of complainant and/or future contact person
- Name of person receiving the complaint (the staff member)
- Nature of the complaint

⁴Forestry operation refers to any harvesting or ancillary road construction conducted under the BN, SWC, RRG IFOA.

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- Where relevant, details of the condition of the approval alleged to have not been complied with
- Precise location of the alleged breach, harm to the environment or reportable harm
- Where relevant, description of the alleged harm to the environment or reportable harm
- Where relevant, waters said to be polluted
- Where relevant, substance said to cause pollution
- Follow-up action taken
- Complaints rated moderate or above, as per FCNSW [FMS Manual](#) **MUST** also be duplicated in RiskWare

Refer to Appendix 2 for step by step instructions on how to enter a complaint into the HFD Complaints Register (via Plan Portal).

Privacy

To ensure compliance with the *Privacy and Personal Information Protection Act 1998*, FCNSW must notify complainants that it is required to forward complaints made under the CIFOA and IFOA's to the EPA, including the name and contact details of the complainant. This notification is achieved by:

- General advice on the FCNSW website; and
- Inclusion of the following form of words in follow-up communication with complainants:

In accordance with the CIFOA/IFOA, complaints made to FCNSW under the CIFOA that allege environmental harm or a breach of the CIFOA, are required to be shared with the Environment Protection Authority (EPA). Details of the complaint including contact details (i.e. name, address, phone number and email address) are provided to the EPA. If you have any objection to this please contact FCNSW.

Responsibilities

- The person who receives the complaint must enter it into the Complaints Register within 5 days of FCNSW becoming aware.
- Supervisors must:
 - Ensure entries are complete with the correct and required information.
 - Determine whether it meets the definition of a complaint under this procedure.
 - Develop an action plan.
 - Ensure actions are closed out prior to due dates.
 - Where relevant, refer to the Complaint Handling Procedure.
 - Where relevant, enter details in RiskWare and follow any appropriate actions.
 - The Compliance Assurance Team (CAT) can assist with developing an action plan.
- The Divisional Management Team (DMT) will review the information collected and provide recommendations where required.
- Notification of the complaint to the EPA will happen automatically via Plan Portal. The information visible to the EPA is noted in the step by step instructions in Appendix 2.

Internal Reporting to Management

Reporting will be through Plan Portal and PowerBI. Complaints will be reported by the Compliance Assurance Team.

The Compliance Assurance Team will manage the HFD Complaints Register.

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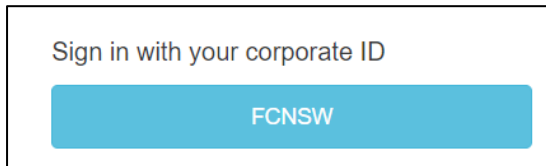
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Appendix 1: Complaint examples

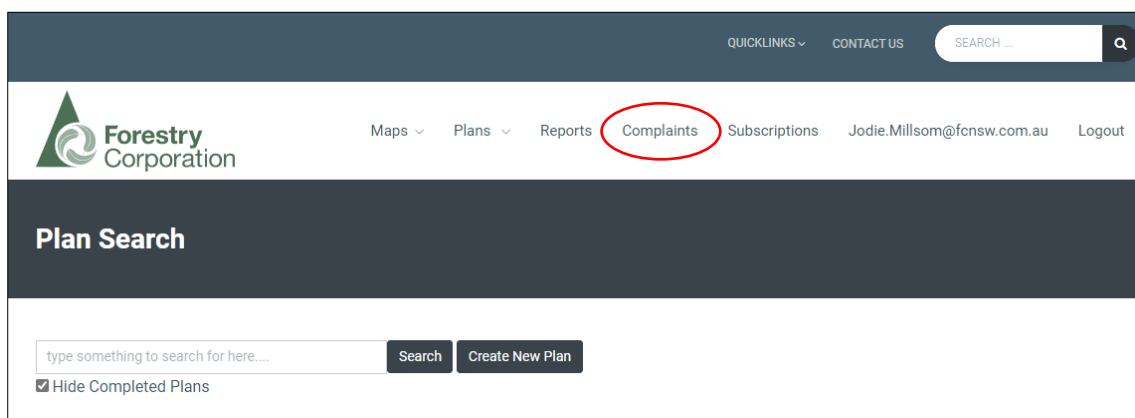
Complaint details	CIFOA/IFOA complaint	Reasoning
Document handed to FCNSW employee requesting a cessation of operations in XXX State Forest. The allegation is that harvesting has injured Swift Parrots AND/OR that the protections required in the CIFOA were not put in place.	Yes	The CIFOA has specific criteria/protocols for Threatened Species and the complaint is alleging harm.
Document handed to FCNSW employee requesting a stop to native forest logging. The allegations were that logging is unsustainable.	No	Generalised statement. Not specific to the CIFOA/IFOA.
Email requesting FCNSW stop operations on the North Coast. Allegations are around logging negatively impacting koala populations.	No	This is a general statement with no specific examples of harm or of a breach of the CIFOA/IFOA.
Email received alleging FCNSW is not marking enough hollow bearing trees in XXX SF.	Yes	The CIFOA/IFOA have specific criteria/protocols for hollow bearing trees.
Email received alleging FCNSW is not marking enough hollow bearing trees.	No	Generalised statement. No examples have been provided alleging a specific location.
Phone call alleging data is missing from Plan Portal – data is not missing.	No	Where the call is a misunderstanding of Plan Portal and the issue is resolved at the time of the call, this is not considered a complaint under the CIFOA.
Phone call alleging data is missing from Plan Portal – data is missing.	Yes	The CIFOA has specific criteria/protocols for publicly available information.
Email stating FCNSW has breached a 50m buffer meant to protect XXX creek and a request to explain why it happened.	Yes	The CIFOA/IFOA has specific criteria/protocols for protection of riparian zones.
Email stating one of our HFD plantations is not compliant with the CIFOA.	No	Plantations are not governed by the CIFOA.
Phone call around log trucks speeding / log truck noise / harvesting operation noise.	No	Noise and truck operation is not covered by the CIFOA/IFOA.
Petition received calling for a halt to operations in XX State Forest and alleging the habitat of XX fish is not being protected.	Yes	If the XX fish is a threatened species, the CIFOA/IFOA has specific criteria/protocols for Threatened Species.
Phone call received alleging a harvesting machine has injured a wombat (coast only).	Yes	While the CIFOA does not have specific criteria/protocols for wombats as they are not a Threatened Species, the complaint alleges harm to an animal.

Appendix 2: How to enter a CIFOA/IFOA complaint into the Complaints Register

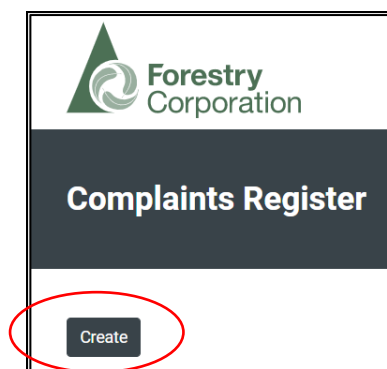
Log onto Plan Portal and sign in using your corporate ID. If you are not signed in correctly, you will not be able to access the Complaints Register.



Select 'Complaints'.



Select 'Create' to enter a new complaint.



You should see the following screen

The screenshot shows a form with the following fields:

- Complainant: Dropdown menu with '- Select Complainant -' and an 'Add New' button.
- Regulation Options: Dropdown menu with '- Select Regulation -'.
- Category: Dropdown menu with '- Select Category -'.
- Functional Unit: Dropdown menu with '- Select Functional Unit-'.
- Nature Of Complaint: Text input field.
- Complaint Description (Internal Use Only): Text input field.
- Complaint Location Description: Text input field.
- GIS only (Optional): Section header.
- Complaint Received By: Dropdown menu with '- Select Complaint Received By -'.
- Complaint Raised At: Text input field with '13/04/2021 04:37 AM' and a calendar icon.
- Communication Method: Dropdown menu with '- Select Communication Method -'.
- Complaint is Publicly Available: Checkbox.
- Complainant has consented to personal details to be released to EPA?: Checkbox.
- Riskware Id: Text input field.
- Content Manager Id: Text input field.
- Create: Button.

Complaint details

Complainant

- If your complainant is not available from the dropdown list, click 'Add New'.

The close-up shows the 'Complainant' field with the text 'test test test@test.com'. A red circle highlights the 'Add New' button, and another red circle highlights the dropdown arrow on the right side of the field.

Regulation options

- Select whether your complaint is against the CIFOA or not. **NB:** Only those complaints that relate to the CIFOA will be displayed in the EPA and Public Complaints Registers. FCNSW staff will be able to see all complaints.

The close-up shows the 'Regulation Options' dropdown menu. The dropdown is open, showing a list of options: Coastal IFOA, Non coastal IFOA, Coastal IFOA (highlighted in blue), South Western Cypress IFOA, Brigalow Nandewar IFOA, and Riverina Red Gum IFOA. A red circle highlights the dropdown arrow on the right side of the menu.

Category

- Select which category from the drop-down menu best describes your complaint.



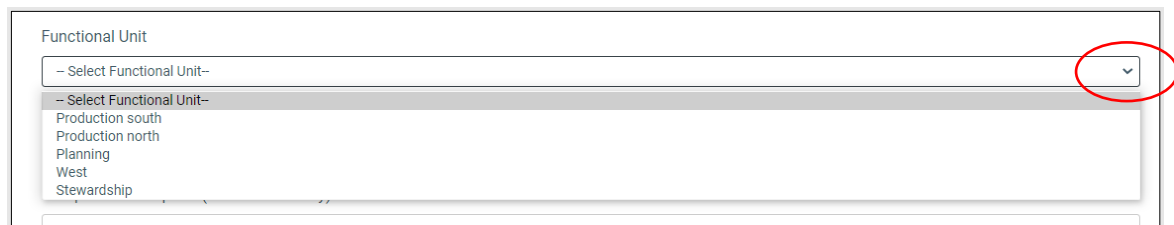
Category

-- Select Category --

- Select Category --
- Haulage
- Pest management
- Weed management
- Harvesting
- Fences
- Public disturbance
- Illegal dumping
- Access
- Fire or HRB
- Neighbour impact
- Illegal activity
- Hunting
- Other
- Planning
- Reporting

Functional unit

- Select the functional unit to which the complaint refers to. E.g. if it's a South Coast harvesting complaint the functional unit should be Production South / if it's a tree marking complaint the functional unit should be Planning.



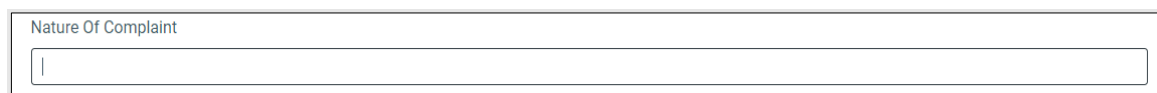
Functional Unit

-- Select Functional Unit--

- Select Functional Unit--
- Production south
- Production north
- Planning
- West
- Stewardship

Nature of complaint

- This is free text to provide a very brief summary of the complaint. **NB: This will be visible on the EPA and Public Complaints Registers.** This should be brief and not include any personal or identifying information of the complainant.



Nature Of Complaint

Complaint description

- Please provide a detailed description of the complaint. **NB: This is for internal use only.** It will not display on the EPA or Public Registers. This is a free text field.



Complaint Description (Internal Use Only)

Complaint location

- Where available this should include the State forest name, compartment number and/or GIS coordinates. This is a free text field.



Complaint Location Description

GIS only

- This section only needs to be completed where the complainant has provided GPS coordinates. Please contact the GIS Analyst if entering for the first time.

The screenshot shows a form section titled "GIS only (Optional)". It contains two input fields: "Location Geometry (Well Known Text)" and "Location Srid". The "Location Srid" field has the number "0" entered.

Complaint received by

- Please select your name from the drop down list. The list is in alphabetical order. If your name does not appear on this list, please email either the FMS Specialist or the Corporate GIS Analyst.

The screenshot shows a form section titled "Complaint Received By". It features a dropdown menu with a red circle around the arrow icon. Below the dropdown is a scrollable list of names and email addresses, including "complaints.user" and various FCNSW staff members.

Complaint raised at

- Select the date and time of the complaint from the calendar icon on the RHS.

The screenshot shows a form section titled "Complaint Raised At". It displays a date and time "12/04/2021 05:12 AM" with a red circle around a calendar icon on the right. Below this is a calendar for April 2021, showing the date "12" selected. To the right of the calendar is a time selection area with "05", "12", and "AM" buttons, and a dropdown menu.

Communication method

- Select how you received the complaint.

The screenshot shows a form section titled "Communication Method". It features a dropdown menu with a red circle around the arrow icon. Below the dropdown is a scrollable list of communication methods: "Verbal", "Mail", and "Email".

Complaint is publicly available

- This box should be ticked when you are 100% satisfied that all information is correct, and the complaint has been closed. As this box states, this will make the complaint visible to the public. **NB:** This does not need to be entered during the initial creation of the complaint. It can be added at a later date once the complaint has been finalised.

Complaint is Publicly Available

Complainant has consented to personal details to be released to the EPA

- Only tick this box if the complainant has not objected to their personal information being passed onto the EPA. If this box is not ticked, personal information will still be available to FCNSW staff, however will not be displayed on the EPA Complaints Register.

Complainant has not objected to personal details being released to the EPA?

RiskWare Id

- Where complaints have a moderate risk rating or above they must be entered into RiskWare. To ensure there is no duplication in reporting, the unique RiskWare Id number must be added to the complaint in Plan Portal. **NB:** This number does not need to be entered during the initial creation of the complaint. It can be added at a later date if the entry is escalated and added to RiskWare.

Riskware Id

Content Manager Id (formerly TRIM)

- All written complaints must be saved to Content Manager. Container F21/142. Include the Content Manager Document Id here.

Content Manager Id

Once all fields have been addressed, click the 'create' button.

Create

If you chose 'CIFOA Complaint' above, a second screen with additional questions will open.

Alleged breached conditions

- Use the top box to search for the relevant CIFOA Condition/s. To do this type in a keyword. The example below has used 'koala' as a keyword.
- Select the relevant condition/s from the list below.

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Koala

Alleged Breached Conditions(s) (if applicable)

-- Select Condition(s) --

65. Koala browse tree retention (Upper North East Subregion and Lower North East Subregion) (CHAPTER 4. OPERATIONAL PLANNING AND IMPLEMENTATION Division 3.1)

75. Koala (CHAPTER 4. OPERATIONAL PLANNING AND IMPLEMENTATION Division 4. Species-specific conditions for fauna)

Harm to the environment or polluted waters

- Where there is alleged harm to the environment or reportable harm please provide a detailed description. This is a free text field.

Harm to Environment (if applicable)

Polluted waters and pollution substance

- Where it is alleged that waters have been polluted please provide a brief description of the waters and the substance said to have caused the alleged pollution.

Polluted Waters (if applicable)

Pollution Substance (where applicable)

Once all fields have been completed, click the 'Submit' button.

Adding an action

For each complaint that is added, actions need to be assigned. NB: Even if the action is 'reply to complainant', it needs to be entered to meet CIFOA Conditions and Protocols (1.4 (1)(g) Follow-up action taken by FCNSW).

To enter an action, click the 'Add Action' button on the bottom of the page.

Actions Completed	Total Actions
0	0

Action Description	Created At	Completed Description	Completed
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Action assigned to

- Please select the name of the person the action is to be assigned to from the drop down list. The list is in alphabetical order. If the name does not appear on this list, please email either the FMS Specialist or the Corporate GIS Analyst.

Action Assigned To

-- Select User --

complaints.user
FCNSW_aden.hitchcock@fcnsw.com.au
FCNSW_Adrien.Thompson@fcnsw.com.au
FCNSW_Alex.Capararo@fcnsw.com.au
FCNSW_alex.flint@fcnsw.com.au
FCNSW_Allan.Robards@fcnsw.com.au
FCNSW_Amba.Addinsall@fcnsw.com.au
FCNSW_andrew.ford@fcnsw.com.au
FCNSW_andrew.goodman@fcnsw.com.au
FCNSW_Andrew.Kemsley@fcnsw.com.au
FCNSW_Andrew.McCurdy@fcnsw.com.au
FCNSW_ann.denlow@fcnsw.com.au
FCNSW_Ashleigh.Abercrombie@fcnsw.com.au
FCNSW_Ashley.Walker@fcnsw.com.au
FCNSW_Betsy.Hoy@fcnsw.com.au
FCNSW_billie-jo.brown@fcnsw.com.au
FCNSW_Bob.Aspden@fcnsw.com.au
FCNSW_brad.robinson@fcnsw.com.au
FCNSW_Brent.Bailey@fcnsw.com.au

Action raised by

- Please select your name from the drop down list. The list is in alphabetical order. If your name does not appear on this list, please email either the FMS Specialist or the Corporate GIS Analyst.

Action Raised By

-- Select User --

complaints.user
FCNSW_aden.hitchcock@fcnsw.com.au
FCNSW_Adrien.Thompson@fcnsw.com.au
FCNSW_Alex.Capararo@fcnsw.com.au
FCNSW_alex.flint@fcnsw.com.au
FCNSW_Allan.Robards@fcnsw.com.au
FCNSW_Amba.Addinsall@fcnsw.com.au
FCNSW_andrew.ford@fcnsw.com.au
FCNSW_andrew.goodman@fcnsw.com.au
FCNSW_Andrew.Kemsley@fcnsw.com.au
FCNSW_Andrew.McCurdy@fcnsw.com.au
FCNSW_ann.denlow@fcnsw.com.au
FCNSW_Ashleigh.Abercrombie@fcnsw.com.au
FCNSW_Ashley.Walker@fcnsw.com.au
FCNSW_Betsy.Hoy@fcnsw.com.au
FCNSW_billie-jo.brown@fcnsw.com.au
FCNSW_Bob.Aspden@fcnsw.com.au
FCNSW_brad.robinson@fcnsw.com.au
FCNSW_Brent.Bailey@fcnsw.com.au

Action description

- Please provide a detailed description of the action taken/to be taken. NB: This will be visible on the EPA and Public Complaints Registers. This is a free text field.

Date of completion

- Select the date the action was completed/is to be completed by from the calendar icon on the right hand side.

Date of Completion

dd/mm/yyyy

April 2021

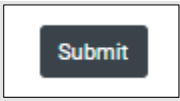
Mo	Tu	We	Th	Fr	Sa	Su
29	30	31	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	1	2
3	4	5	6	7	8	9

Completed description

- Please provide a detailed description of the follow up action if it differs from the Action Description. NB: This will be visible on the EPA and Public Complaints Registers. This is a free text field.

Completed Description

To complete your complaint entry please select Submit.



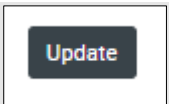
Editing your complaint at a later date

To edit your complaint at a later date. Log into the Complaints Register on Plan Portal (instructions above).

You should be able to see all complaints that are open. Select the 'Edit' button from the right hand side.

Tony Brown	test complaint to see how the system works	Valid	Verbal	Harvesting	Production north	False	11/03/2021 10:43 PM	0	False	Details	Edit
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Once you have completed your edits, select the 'Update' button at the bottom of the screen.



To edit your action plan either:

- Select the 'Edit' button from the right hand side to edit existing actions.
- Select the 'Add Action' button to add additional actions.

Add Action					
Actions Completed	Total Actions				
1	1				
Action Description	Created At	Completed Description	Completed		
test	12/04/2021 10:49 PM	test	True	Details	Edit

When you have completed your edits select 'Submit'. Completed complaints will show on both the Public and EPA Complaint Register Reports.

