



INSTITUTE OF FORESTERS OF AUSTRALIA

13 July 2018

Submission to NSW IFOA Review Process

Institute of Foresters of Australia

The Institute of Foresters of Australia (IFA) welcomes the opportunity to contribute to the review of the New South Wales Integrated Forestry Operations Approvals.

The Institute

The IFA has been the peak body representing professional forest managers, researchers, academics and other related professionals since 1935. As such, we are uniquely qualified to contribute to the development and review of standards for forest management operations including, but not limited to timber harvesting.

The full list of Objects of the Institute are enshrined in its Constitution available at <https://www.forestry.org.au/ckeditor/ckfinder/userfiles/files/IFA%20DRAFT%20constitution%20March%202015.pdf>.

They include to:

- Further the science and technology and understanding of sustainable forestry in all its forms.
- Develop and represent the issues around best practice sustainable forestry standards to governments, regulators, other professional associations and the community.
- Promote consistent standards of regulation at all levels for the achievement and maintenance of standards for sustainable forestry.
- Promote high standards of competency, professionalism and ethical conduct in providing professional services in the field of sustainable forestry
- Provide guidance to individuals involved in the supply of services in sustainable forestry and
- Provide information and liaison at government and other enquiries, investigations and forums concerning the field of sustainable forestry.

The IFA also has numerous policy statements on various aspects of forest values, management and uses. These represent a consensus view of professional foresters, are free of the beliefs and convictions of either political parties or industrial lobby groups and are publicly available on the IFA website www.forestry.org.au/about-ifa/ifa-policies. It is clear from these policies that the IFA supports balanced use of public forests to optimise and balance the many benefits provided by them. It is certainly not, as is often imagined, an apologist for the timber industry or any other narrow interest group. The IFA also supports the International Convention on Biological Diversity (CBD) to which Australia is a signatory www.cbd.int/convention

The Institute is therefore vitally concerned with standards of professional forestry in Australia and sees it as imperative that Government agencies charged with the regulation of standards are staffed with appropriately qualified officers.



INSTITUTE OF FORESTERS OF AUSTRALIA

Environmental Goals and Outcomes

In the late 1990s, around \$200 million was invested on comprehensive regional assessments to provide a sound foundation for the NSW RFAs and IFOAs. In the 20 years since there have been no significant advances, in either understanding or knowledge. In the absence of any serious commitment to monitoring and reporting, the original assumptions about the benefits of a CAR reserve systems and a heavily regulated forestry sector remain untested. Similarly, the relationship between the conservation reserve system and other forest values has received little attention.

In the absence of meaningful data on the IFOA's effectiveness the assumption is that the existing approach is working. The growing number of plant and animal species listed as threatened, however, suggests that investment in the reservation of public land may not be delivering as good a return as was originally envisaged.

Environmental outcomes need to be better researched and defined before prescriptions can be developed to achieve them. Limitations to the IFOA are based on the premise that timber harvesting necessarily compromises environmental outcomes and that the best or only way of achieving such outcomes is to place further restrictions on timber harvesting. Pejorative terms such as "permanently protected" taken to mean withdrawn from harvesting are indicative of this prejudice. The IFA believes that with:

- a. better definition of the environmental outcomes being sought,
- b. a monitoring program across all tenures, and
- c. research into how to achieve the desired outcomes,

more effective management prescriptions can result in improved environmental and timber production outcomes. Those management prescriptions should not, of course be limited to timber harvesting prescriptions nor to timber producing tenures.

The IFA wishes to acknowledge the NSW Government's recent announcement of \$9.2 million for cross-tenure forest monitoring and mapping. The IFA strongly supports this initiative seeing it as recognition of the need to improve the knowledge base and the importance of looking beyond tenure.

In defining desired environmental goals, due recognition needs to be made of the dynamic nature of forest ecosystems. Ephemeral aesthetic impact on a given site is too often confused with long term sustainability criteria. Media "grabs" and lack of long term monitoring only enhance this confusion. The concept of permanent protection for individual trees is indicative of this simplistic view.

The "Twin Commitments"

In relation to the "Twin Commitments", the IFA supports the commitment not to further erode either environmental values or change timber supply in the absence of evidence that current prescriptions, proscriptions and reservation strategies have achieved these goals over the past 20 years. However, the commitments are worded in the negative and we believe that with the newly proposed monitoring program, there are opportunities to develop prescriptions that would enhance both.

We are also concerned that withdrawal of further timber resource into the reserve system together with the "twin commitments" will lead to accelerated and unsustainable levels of harvesting and or a reduction in the quality of timber resources available for processing and use.



INSTITUTE OF FORESTERS OF AUSTRALIA

Iconic Species

The emphasis on koalas provides a good illustration of lack of definition of environmental goals. The IFA recognises that koalas are an iconic species, but they are not necessarily an indicator of overall ecosystem health. Koalas remain classified as threatened with some claiming that many populations are in terminal decline. Recent surveys on the north coast¹, however, are showing that the species is much more widely distributed than previously thought and with the right technology can be readily found in many State forests with a long history of heavy harvesting (without koala prescriptions).

We accept that Governments are obliged to protect and enhance such iconic species but should not do so to the detriment of the overall health of ecosystems. For the vast majority of species or ecological communities that have been listed as threatened, knowledge about their true conservation status is clearly wanting. It is therefore surprising that there are no commitments within the IFOA remake to address these fundamental knowledge gaps. Instead, the IFOA remake has resorted to a more simplistic, populist strategy for threatened species of prescriptions and reserves. In total, the IFOA remake dedicates over 36 pages to this one-dimensional approach. In contrast, there are no specific prescriptions for the management of ecosystem productivity and health.

While we understand that the RFA process was initiated by the Commonwealth using their export control powers applied to woodchip exports, the restriction of IFOAs to timber harvesting operations acts contrary to an integrated and comprehensive system of achieving environmental outcomes in general, and addressing threatening processes, in particular.

Soil and Water

We applaud the introduction of Lidar technology to overcome the limitations of the Strahler stream ordering used under previous mapping technology. However we are concerned that the proposals:

- a. are based on the premise that the most effective way to achieve soil and water protection is by limiting harvest area. Numerous studies have shown that soil disturbance within harvest areas leads to negligible erosion and turbidity when compared to roading and, in particular, direct connection between road structures and streams; and
- b. fail to take any account of stream energy, rainfall erosivity and soil erodibility.

Again, management prescriptions to improve soil & water quality outcomes should not be limited to restrictions on timber harvesting. For example, restoration of a regular mild fire regime would improve protection from erosion caused by high intensity wildfire.

Regulatory Framework

The proposed IFOA's are clearly designed around enforceability rather than improved practices and outcomes. Of particular concern is that there are two public agencies, Forestry Corporation and EPA charged with supervision of timber harvesting practices which at best is wasteful and at worst likely to prove counterproductive. The ESFM principle of *(c) providing incentives for voluntary compliance, capacity building and adoption of best-practice standards* recognises this aspect but appears to have been ignored in the development of these proposals.

¹ Dr Brad Law (NSW DPI) cross tenure north coast koala site occupancy survey (200 sites).



INSTITUTE OF FORESTERS OF AUSTRALIA

Furthermore, the cost of implementing the standards and overseeing them does not appear to have been assessed.

Summary

It is clear that a simplistic, one dimensional approach is easy to sell at a political level but does little for the long-term sustainability of our forested landscapes.

European settlement has led to dramatic impacts on ecosystems, species and populations but it is worth noting that no extinctions have been recorded due to timber harvesting operations since European settlement. Land clearing has largely been addressed through government policies, but the threats posed by exotic disease, plant and animal incursions are not being addressed in a consistent and strategic manner and the growing body of published evidence on the impacts on natural ecosystems of the curtailment of regular mild fire throughout the landscape are not even considered. These threats require far greater investment by Government. It is hoped that the Government's proposed forest monitoring program represents the start of a larger ongoing commitment that will monitor the effects of common threats as well as the impacts of various timber harvesting prescriptions, proscriptions and reservation strategies.