

REMAKE OF THE COASTAL INTEGRATED FORESTRY OPERATIONS APPROVALS DISCUSSION PAPER FEBRUARY 2014

1. *Overview*

I agree with the objectives as expressed in paragraph 4 and 5 and support the review in principal and appreciate the opportunity to participate in this process.

2.0 *Why the NSW Government is remaking the coastal IFOAs*

2.1 *Objectives of the IFOA remake*

The aim to reduce costs without eroding environmental values and no net change to Wood Supply Agreements.

It is only logical and makes sense that a remake is needed but all key principals that guide it have to be supported after the three stage process of the remake.

After studying the IFOA remake recommendations I am very concerned at the end result of more stringent protection of the environment and not delivering satisfactory socio-economic outcomes.

2.2 *Scope of the IFOA remake*

The present IFOA process is costly, time consuming and has four separate licences to conform to and certainly need modernising.

3 *Stakeholder engagement*

So far the three stage stakeholder engagement process is supported.

The community forums have been informative but I am concerned at were from these meetings.

The Industry still needs to be consulted on any changes that peak groups may be demanding. Not to be signed off on till all Stakeholders have been consulted.

4 *The NSW Forestry Framework*

At least this present IFOA was workable, I am concerned that the change may make the whole process unworkable with third party protests able to stop all operations.

I believe IFOAs should not only maintain and enhance the environmental but be expanded to strengthen the protection of the socio-economic values of the timber dependent communities.

4.1 *The NSW Forest Agreements*

These four agreements have been working for over ten years, why any change when three Ministers signed off on them.

4.2 *Relationship to Commonwealth Agreements*

I agree we have to have these agreements with the Federal Government so as we can work together in exporting our finished products.

4.3 *Integrated Forestry Operations Approvals*

There are four current areas in the IFOAs that contain provisions applying to forest operations generally as well as a EPA, a POEO, a TS and fisheries license. The whole process

is regulated by the EPA and DPI departments and is very costly and time consuming for FC NSW to absorb.

5 *The proposed coastal IFOA structure and framework*

In my view the review of the IFOA at this time must ensure a balanced outcome of the original assessments, legislation and regulations. The review of the IFOA must include a review on the Wood Supply, plus the socio-economic values and environmental values to sustain the original forest assessments. It also should comply with the conditions of the Regional Forest Agreements with the Commonwealth Government.

To restructure these four licences makes good sense but we have to be wary of any change without our agreement.

5.1 *A new IFOA and licence structure*

There will be four sections in the new IFOA process

- Administration conditions
- Planning conditions
- Operational conditions, and
- Monitoring and reporting conditions

The outcomes look clear but we have to be wary as Government departments have not been friendly to Industry in the past.

It is not clear if the new IFOA licences will be in effect a single one covering all coastal areas and replace the four existing licences.

This needs to be clarified but better integration and alignment of conditions applying to existing licences under a new coastal IFOA should lead to lower costs and improved outcomes and efficiencies.

5.2 *Regulatory approach under the new coastal IFOA*

Need to consultate further with the stakeholders before any new amendments to legislation are passed in relation to the Environment Protection Licence, Threatened Species Licence and Fisheries Licence.

5.3 *Proposed legislative amendments*

Further negotiations with stakeholders as it is not clear what powers the EPA Department will have over the amendments to the Forestry Act 2012.

More information required on these proposed change.

Introduce minimum competencies for forest contractors

I understand that present contractors with FC NSW have to comply with certain conditions of competency and to have continued competency sessions each year so as to keep up with new technology and safety regulations. I believe these regulations should be mandatory for contractors working on Government land as well as private tenures.

Strengthen penalties and alternative regulatory tools

We have to be very mindful of the proposed changes and penalties being mentioned as this can make the whole process unworkable. Further review by all stakeholders on these changes.

Improve access to information about amendments

I agree all forms of communication be used to notify the community and stakeholders on amendments to the regulations.

6 ***What will the new coastal IFOA cover?***

The same area as UNE, LNE, Eden and Southern regions.

Table 2 – Activities not proposed to be regulated under the new IFOA include:

- Forest products operations
- Burning
- Heritage matters
- Bee keeping
- Grazing
- Weed and pest control

Activities where coverage is not made explicit

- Timber harvesting activities traditionally covered under a Forestry Act permit.
- Control and management of disease.
- Management of climate change impacts.

Based on the proposed coverage it may be concluded that the largest threat to native forests values is mainly altered by wildfires, pests, and diseases not by managed harvesting.

The application of landscape scale management principles to human induced disturbance activities, enables them to be more effectively integrated with other natural disturbance and recovery.

7 ***Landscape-based protection for threatened species and communities***

All biodiversity legislation in NSW under review (TSC Act, FM Act, NPW Act) any implications to IFOA to be considered when review is complete. Would like to see this Act cover all land uses in NSW including National Parks, Crown Reserves, Aboriginal Sites.

We need a register of all TSC, TS and FM from all land uses not just State Forests.

7.1 ***Weaknesses in the current approach to managing impacts on threatened species and communities***

Surveys are costly but these outcomes should not be decided on before further consultation with stakeholders.

I am very concerned at the proposal to commit resources to better define Endangered Ecological Communities (EEC) and Threatened Ecological Communities (TEC) as this will further reduce the State Forests available for harvesting.

A major issue for the IFOA remake is to identify the source and location of additional forest areas that will be required if time and space targets are to be implemented.

7.2 ***Proposed move to strengthened, multi-scale, landscape-based protections for threatened Species and communities***

Have to be concerned that the protection of the number of habitat trees in certain areas is not guaranteed to reach the same outcome in another. Certain forests will have more habitat trees than others so decisions have to be made on different sites as to how many

habitat trees should be preserved, as not all of these trees will attract animals.

I agree with targeted ongoing monitoring of TS & TC to assess key outcomes, but who pays for this process.

7.3 Proposed process developing the licence framework for threatened species and Communities

Four steps to be proposed

1. The Forest Practices Authority of Tasmania is to be engaged to review new approach.
2. EPA, FCNSW & DPI will set threshold limits for landscape provisions.
3. Review by final expert panel of species specific protection measures.
4. Expert panels conditions available at Stage 3 of public consultation to be included in IFOA.

All these new steps will only reduce the area allowed to be harvested which means less timber available to Industry.

7.4 Other important Issues – Bell miner associated dieback

Ongoing threat to certain forest types in NSW has a potential risk in the long term management of our forests.

8 Soil and water

I agree we all have to minimise the risk of erosion and water pollution especially in regards to our fish and drinking water so strict regulation should be followed especially in specific water catchments.

8.2 Proposed changes to soil and water protection components of the IFOA

Aims to reduce the number of licence conditions, remove duplication and reduce the prescriptive nature so the requirements are clear, straight forward, outcome based using available technology (LiDAR) can be monitored and are enforceable. This could be supported after further stakeholder comment in Stage 3.

8.3 Steep slope harvesting trial

I agree we need to assess the small scale trials to be conducted b FC NSW in the dry season.

9 Adopting new technologies to improve the accuracy and efficiency of the identification of Protected areas of environmental significance

Should always be assessing the use of new technology (eg Robots to fall trees on steep slopes and cable logging)

9.1 Opportunities presented by LiDAR and Geonet technologies for soil, water and threatened species protection

LiDAR and GPS will provide more accurate stream mapping and boundary marking. This could work two ways. Some areas may become available for harvesting and unmapped drainage lines will be picked up and deleted from logging.

I am in favour of accuracy and accountability but it may come at a cost, time will only tell.

10 A new strategic environmental monitoring framework

Who will monitor these IFOA's

Regulate the Regulator

I only see problems in this area and will need further consultation before agreeing to who regulates FC NSW.

11 Delivering the new coastal IFOA

Very concerned at the final outcome for the Timber Industry.

11.1 Implementing the new coastal IFOA

Need further advice and consultation as to how EPA and DPI will regulate FC NSW this sounds like a dog chasing it's tail.

Why change something at a great cost when it is working.

11.2 Making information more accessible to the community

I believe SF NSW have been accountable and transparent in their approach to managing our native forests. Why do we still have these magnificent regrowth forests you see today.

I have been working in this Industry for over 60 years and I see more trees in todays forests than 60 years ago.

Also I have witnessed the increase in wildlife as these forests progressed. I know too well we have to protect our heritage which SF NSW has carried out quite effectively over this period.

My concern is this Government is looking to remake this IFOA less costly to maintain but when I read this document I see more regulations, higher costs and eventually less jobs for the country people of NSW.

11.3 Review of the new IFOA

These reviews will only cost more money and who is to say we will have a job in 2018.

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