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Responded At: Jun 27, 2018 17:31:11 pm

Last Seen: Jun 27, 2018 17:31:11 pm

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- Q7. **Country** Australia
- Q8. **Stakeholder type** Individual
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** [REDACTED]
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** Yes
- Q14. **Can the EPA make your submission public?** Yes, but anonymous
- Q15. **Have you previously engaged with the EPA on forestry issues?** Yes

Q16. What parts of the draft Coastal IFOA are most important to you? Why?

Wood Supply - the timber industry has been decimated by successive transfers of productive forests to reserves, and erosion of available resource through compliance overlays. Active and Adaptive Management - the "forest museum" approach, whereby working forests are placed in permanent reserve does not accommodate the dynamic nature of the Australian forest. Outcome based management - achieving good environmental, social and economic outcomes should be placed above prescriptive compliance. Good Silviculture - stand productivity through sound prescriptions Recognition of the potential impact of prescriptions on harvesting costs Striking a balance between harvesting contractor and FCNSW responsibilities

Q17. What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?

- One positive aspect of the draft is that it will provide Forestry Corporation with greater silvicultural discretion in the form of new minimum basal area limits and an ability to clump retained trees. Previous basal area limits reduced current and future stand yields significantly. Clumps are superior to retention of individual or scattered trees as they are easier to manage (prescribed burning, minimizing tree damage etc) and are less likely to suffer from windthrow.
- The current IFOAs are dated and need revision, plus there is logic in bringing together the 4 IFOAs into one.

Q18. What parts of the draft Coastal IFOA do you think have a negative outcome on the management of environmental values or the production of sustainable timber? Why?

Wood Supply The draft has more tightly prescribed requirements around the permanent retention of habitat and retained trees and new species protection prescriptions. Traditionally these things were left to the discretion of the forest manager. All of these changes are expected to have an impact on wood supply. The draft is strong on guaranteeing regeneration stocking following harvesting, but fails to recognize that the higher the level of tree retention, the greater the loss in stand productivity. For instance research work conducted by Dr Hiquan Bi for FCNSW clearly defined significant drops in stand Mean Annual Increment as tree retention levels increased. In addition FCNSW wood supply modelling cannot be relied upon to account for all of the new requirements in the draft so it is not appropriate for the government to claim that there will be no net change to wood supply. On the north coast the industry was impacted in 2014 by a 50,000m³ buyback of high quality logs as predicted yields weren't sustainable. Harvesting Costs It appears there has been no modelling of the impact of the draft on harvesting costs. With no plans for pilot testing, the new approval leaves harvest contractors and wood processors to carry the commercial risk. FCNSW has recently flagged to industry that it will be seeking to delegate its obligations and responsibilities where it can to harvestings contractors. This can only mean that a harvesting contractor will lose timber production time to satisfy these requirements. Should FCNSW reduce their own supervisory staff through such a transfer of responsibility, this would be a poor outcome as we still need a critical mass of FCNSW employees to fulfil vital roles such as fire-fighting. Float shift costs to cover the cost of moving harvesting equipment more frequently to smaller harvesting units will inflate mill door sales costs to the customer. Species Protection The draft IFOA seems to take the over simplistic approach that species protection should be focused on reservation in all instances, rather than active management. For instance the benefits of a multi-age, regenerating forest to certain species such as koalas has largely been ignored, in preference to the "lock-it-up and leave" philosophy.

Q19. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?

Landscape level planning controls impose new restrictions on where logs can be sourced (particularly during periods of prolonged wet weather) and this poses a risk to the supply of traditional species mix and may impact on production and haulage costs.

Q20. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?

The NSW Government gave a commitment to remake the coastal IFOA so that it would be less prescriptive and more outcome-based. The opposite has occurred. Also the Coastal IFOA consultation draft includes 20 'outcome statements' which are simply aspirational statements that do not result in demonstrable outcomes. The draft is a highly prescriptive instrument under which there is very limited operating discretion. The draft is a regulatory model that is devoid of trust. The draft strips the FCNSW of many of its traditional powers and replaces them with burdensome reporting and administrative obligations. This adds to the huge burden of reaching and reporting on RFA milestones, to the extent that FCNSW staff will be under ever increasing administrative pressure. There is no evidence that the draft will be of any benefit to the timber industry, as it won't yield any significant additional resource, or reduce management or production costs.

Q21. General comments

Under the draft, FCNSW officers are likely to remain obsessed with operational compliance and even less focused on timber industry viability.

Q22. Attach your supporting documents (Document 1) not answered

Q23. Attach your supporting documents (Document 2) not answered

Q24. Attach your supporting documents (Document 3) not answered
