

Feedback on Remake of Coastal IFOA discussion paper.

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Author: The author holds first degrees in Science and Science (forestry) as well as a Diploma in Agriculture. He has worked in the forest industry for 40 years finishing full time employment with Boral Timber as Forest Superintendent then on a part time basis with the same company as Forester Emeritus. He is now fully retired but still maintains an interest in the forest industry and membership of both the Institute of Foresters and the Forest Products Association.

Introduction: The objectives of the remake of the IFOA to reduce the costs of implementation and compliance and to improve clarity are commendable. The author supports the delivering of these objectives with no negative effect to wood supply. It is assumed that this refers to quantity, size, species mix, quality and delivered log cost.

The author also commends the process of the seeking of comments on the key concepts before a new IFOA is prepared.

There has been an enormous investment in area and opportunity costs with the transfer of State Forests to the various tenures under NP&WS management. It is the author's view that the NP&WS need to be held accountable as to their stewardship and the public benefit demonstrated of the transfers of tenure that have occurred to date. Given the areas transferred and the time under NP&WS management there should be multiple species being taken off the endangered and vulnerable lists under the Threatened Species legislation. To the author's knowledge this has not occurred. It is the author's view that given the long history of wildlife surveys on State Forests and the demonstrated compatibility of wildlife with forest harvesting over long periods the FCNSW should be exempt from the provisions of the Threatened Species legislation. This would simplify the remake of the IFOA considerably. The FCNSW still needs to ensure appropriate water quality leaving its catchments and soil loss is minimised. The author is aware of comparative catchment research work carried out on State Forests that has yielded data that points to effective measures that can be taken to ensure water quality and minimise soil loss. A new IFOA based on outcomes and appropriate monitoring and reporting is likely to yield both flexibility for the FCNSW and the desired results.

Exemption of State Forests from the provisions of both the Wilderness Act and the NP&WS Act with regard to identification or proposal (except at the direction of the appropriate ministers) for a change of tenure must be part of the basis for any new IFOA to ensure there is no further diminution of wood supply.

Feedback on the detail:

Section 5: The author strongly supports landscape based measures that have an underlying measurable outcome such as turbidity in water flowing from FCNSW managed and harvested areas. However if landscape based measures is interpreted as simply reserving all hollow bearing trees in a landscape or all tree species that can be classified as a koala feed tree then this is simply making State Forests into de facto national parks. The same applies to the current classification of “old growth” forests, this classification is a best a “hit and miss affair” and the fact that a tree or group of trees is old should not mean that this country is sterilised for timber production purposes. The author believes that previous reservations into NP&WS managed tenures was aimed at preserving the vast bulk of “HVCOG forests” as well as the major tracts of rainforest and “wilderness areas”. Put simply State Forests should have as their major aim and activity the production of timber. The IFOA and the enabling legislation should recognise and support this.

Landscape focused Page 13: In the second paragraph of this section it is noted that species specific surveys especially for flora, will still need to be carried out. Flora surveys have been carried out on in pre-harvesting surveys for decades. This has provided a vast resource of flora data on the majority of State Forests. The author doubts if there will be any need for additional surveys to take place.

The second last paragraph of page 13 of the proposal seems to set up an “either or” situation that enables the FCNSW to either use the guidance provided by the new IFOA and be judged accordingly or to achieve the outcomes specified in the licence by a means of their own choosing. The workability of this clause is highly dependent on both

the outcomes specified in the relevant licence and the type of guidance provided in new IFOA. Further comment may need to be made at a later stage of the consultation process when examples or the direction of this provision becomes clearer.

The provision to allow guidance material to be further developed and evolve over time (page 14 second paragraph) is a potential problem for the FCNSW and much will depend on the “by whom and by what process” this can be done. This needs to be fleshed out in the next stage of the consultation process.

Section 5.2: The author is aware of the multi layered auditing that now takes place both internally with the FCNSW and by the licensing authorities. This often involves more people than actually carry out the harvesting. This is a costly and nonsensical situation that needs to be simplified with the associated costs reduced significantly. A new IFOA should aim to facilitate a simplification of the auditing process.

Section 5.3: EPL: If there is to be any change to the scheduled/non-scheduled operations under the FCNSW control and ensuring that the EPL applies to all timber harvesting on State Forests then this needs to be done so as there is no loss of resource availability.

Alternatively areas currently excluded under the current IFOA on State Forests should be made available to compensate for any loss of resource.

Minimum Competencies: Contractors working on State Forests have traditionally been licensed with appropriate competency levels recognised. The FCNSW is the statutory authority that is charged with managing State Forests and as such, in the author's view, needs to retain the primary accountability for their remit. Contractors have over time been involved in many training sessions and at times major investment to meet compliance standards in both the environmental and safety fields. To maintain cost competitiveness any changes need to ensure that major barriers are not erected for new entrants. Many contractors already work both private property and State Forests and often are capable of moving to different areas sometimes on a regular basis.

Table 2 Page 18: Silvicultural practices. If a new IFOA is to include tree retention rates this is likely to impede regeneration.

Determination of the appropriate silvicultural system and tree retention rates, in the author's view, is best left to the managing foresters; it is the outcomes that should be specified in the IFOA not the detailed means to achieve them.

Regeneration: It is the managing agencies responsibility to regenerate the forest following harvesting where the stand is either at end point or in a degraded condition. The FCNSW does need maximum flexibility to achieve this in a cost effective manner. The silvicultural practices and regeneration requirements specified in a new IFOA need to be compatible.

Forest Products Operations: The FCNSW should be allowed maximum flexibility to sell products from State Forests. This in the

author's view should include quarry products with the FCNSW planning for and working within determined outcomes with regard to water runoff quality, soil loss and visual amenity. Such flexibility and requirements could sensibly be included in an IFOA eliminating a costly additional approval process.

Page 19: Burning: The FCNSW must be given maximum flexibility to determine when, how and for what reason burning within State Forests takes place. There are varied reasons for a managing forester to decide when and how an area of forest should be burnt and at what intensity. In the light of the massive data set now available from the years of wildlife surveys on State Forests the author is of the view that further survey work carried out and funded by the FCNSW should be negligible and have little impact on decisions for burning.

Bee-keeping/Grazing: The author supports the intent of allowing continuing bee-keeping/nectar harvesting and animal grazing on State Forests. These should be part of the FCNSW business with minimal other agency bureaucratic requirements or restrictions.

Section 7 Page 20: TECs: The concept of applying and trying to preserve TECs on State Forests is in the author's view spurious. The whole RFA process was aimed at preserving under NP&WS tenures representative samples of the range of communities that need should be preserved and thus fulfilled the RFA criteria of a "Comprehensive, adequate and representative reserve system". The inclusion of TECs within the framework of a new IFOA is, in the author's view, likely to lead to further preservation of large areas of commercial forest. The original forest typing was carried out by the Forestry Commission of NSW and published in Research Note 17. This

remains the “gold standard” for forest activities and further splitting and classification is nonsensical for commercial forestry.

Effectiveness and efficiency of the TSL: See the author’s introduction in this feedback paper. Any landscape approach must not end up further preserving large areas of commercial forest or trees or reducing the forest’s capacity to regenerate following harvesting.

Effectiveness of targeted survey requirements, Page 22: The author concurs that further survey work is unlikely to be necessary. Refer to the author’s introduction in this feedback paper. It is the author’s view that the NP&WS must demonstrate the value in terms of species preservation and increase in the light of the massive areas transferred from State Forests to NP&WS tenure. The FCNSW has already demonstrated through years of survey data the compatibility of timber harvesting and wildlife.

Section 7.2: Any “off reserve” landscape-level measures should not result in any loss of commercial forest or timber in volume, size or quality terms, nor should it increase costs to the timber industry or the FCNSW.

General licence conditions, Page 23: Retention of the “old growth” as zoned at present when the known inaccuracies in typing has no basis in science. It is the author’s view that “old growth” protection

outside the of the current NP&WS managed areas is unnecessary and an inhibitor on forest productivity.

The author concurs with the intent of improving the mapping for drainage feature protection and ridge and headwater corridors. There are many instances on coastal State Forests where commercial tree harvesting has been carried out over a number of cutting cycles that are now excluded under the current IFOA conditions. A new IFOA needs to be outcome based not prescription based with the FCNSW being given the responsibility to determine how best to achieve the outcome.

Conditions for impacts at the local landscape scale Page 24: The field applicability of minimum required thresholds will depend on the detail; the typing in Research Note 17 is a good guide to minimum areas that can be reasonably forest typed. Management units may need to be greater. Maximum thresholds must not impede the FCNSW ability to either commercially produce timber or reduce flexibility in achieving the desired regeneration outcome. The professional forest managers need to be able to specify the silvicultural system employed in managing the forest and therefore the forest age classes that will be present. It is unreasonable that a new IFOA should specify detail to this level; it is the outcome of a growing productive forest that is required. Specifying detail at too local a level is undesirable; the nature of forest operations over time and space will ensure there will be a range of age classes in the various forest types.

Stand-level retention measures, Page 25: Tree retention (hollow bearing and recruitment) for potential wildlife conservation and landscape connectivity has a cost in terms of forest productivity and opportunity cost as well as costs in terms of management. Following the RFA process where large tracts of land were transferred to NP&WS tenures; it is the author's view that the main aim of State Forests should be to grow timber for the benefit of the people of NSW.

Burning: Outcomes only should be specified in the new IFOA with the FCNSW having the flexibility to manage the process.

Species requiring additional conditions, Page 26: The Hastings River Mouse issue has been a saga with significant costs with regard to research, years of sterilised commercial forests, extra management costs with no obvious benefit. Given the number of trapping events, the research on habit and range as well as its compatibility with commercial forestry and timber harvesting it should have been removed from the threatened species schedule years ago. This is a prime example of the need not to apply the TSL to State Forests.

Bell miner associated dieback, Page 27: The FCNSW should be encouraged to continue their research and involvement with this issue until a resolution has been achieved.

Section 8 Soil and Water Page 29: There has been a significant amount of contactor training, monitoring and research into the

effectiveness of the various mitigation measures to maintain water quality and reduce soil loss. The involvement of the personnel from the old Soil Conservation Service was very helpful in this regard. The skill and consistency of harvesting contractors is now at a high level with regard to mitigation requirements.

The author supports the simplification of the IFOA requirements with emphasis on outcomes not details of implementation. The responsibility for deciding on the type of measure and management of the implementation is better managed by the FCNSW.

Section 8: Steep slope harvesting trial, Page 31: Timber harvesting systems designed for steeper areas (forms of the high lead system) have been trialled on State Forests on a number of occasions. The common theme that arose from those trials was where there were tree retention requirements the only feasible method was the side cut and manually fall. It is the author's view that it is likely that a far better return will be generated by reviewing the forest and tree retention requirements on lower slope operations.

Section 9: New technologies, Page 32: The author supports the introduction of the LiDAR and GPS technologies and the review of the measures to achieve the protection of stream and drainage line beds (page 37). Responsibility and costs associated with supervising and managing the measures to achieve the outcomes specified in the IFOA should remain with the managing agency, the FCNSW. A cost shift to the contractors and therefore the timber buyers is unacceptable.

Sections 10 & 11: Monitoring framework, Page 38 & Review process, Page 39: Monitoring of the outcomes is essential, this can be by the FCNSW so long as these are duly recorded and published from time to time. However the current multi layered auditing is a very expensive and wasteful process that needs to be simplified.

Any review process needs to involve the Timber Industry as well as the agencies involved.

End.