

Submission to the Coastal IFOA 'Remake'

It is clear from the EPA webpage that the primary intent of this 'remake' is to save money for the Forestry Corp (FC). The prominence of the link to, and the content of the FC paper 'Costs of Complying' leaves no doubt. This is about the FC cutting essential services while continuing its business as usual – haemorrhaging public funds. Perhaps its new status as a corporation requires a mirage of financial responsibility?

That the three licenses which are part of the IFOA do not concur is hardly surprising, they derive from separate legislative instruments and seek to protect different features of the landscape and biodiversity. Where one license requires a higher form of protection than another simply reflects the priority of that license. Multiple legal controls apply to us all in daily life, we simply obey the most stringent. There is no justification for a call to 'harmonise' them.

That many of the conditions of the licenses are found to be not sufficiently specific or enforceable is not surprising either. It is well-known that forestry operatives were parachuted in to the design of the licenses. Their interference in the drafting of the conditions has, in large part, resulted in their unenforceability. This remake is simply the next step in their long game. The fox designs the henhouse - with a trapdoor.

The proposed cessation of most pre-logging surveys will end what little ecological data-gathering now goes on in the forests. It is not well-designed or systematic, nor suitable for longer-term monitoring or trend reporting, but it has been the only continuing survey campaign since the IFOA. The discussion paper is vague and non-committal about 'strategic monitoring'.

The discussion paper uses the term 'landscape-focused' protections and protocols without specifying how or what might be done. Heritage controls, grazing, beekeeping and weed control will all be either left to other (inadequate) legislation, or put on the back-burner for FC to get around to in their own time.

One and a half decades of logging have been conducted under the IFOA with barely a glimpse into the real consequences of the activity. The conditions of the licenses were the best that could be achieved at the time, and it was recognised that monitoring of their effectiveness was vital to inform the 5 yearly reviews. This was of course not done, and what has passed for review have been simply papering-over and watering-down exercises.

The 'remake' takes great care to state and restate that timber yields will not be affected by the changes, and repeats the myth that yields are 'sustainable'. The yields were set by political process, and the Frames software that used the manifestly inadequate data of the time was manipulated to create the appearance of scientific method. It is anything but. With more hidden wheels, weights and brakes than a one-armed bandit, it could be and was tuned to spit out the required numbers.

FC were given a few \$million more to improve the 'strategic inventory' and the growth modelling, but at last enquiry, that money seemed to have been diverted into other unspecific projects. They have apparently now abandoned that previous system, on which the state of NSW signed contracts worth hundreds of \$ millions and moved on to the next fantasy generator for their predictions. Comparison of actual yields to those predicted remains a well-guarded secret.

The proposed change from Strahler stream ordering to a new, unspecified system, which is claimed to protect a similar area of stream-sides, will likely be fine tuned by FC GIS gnomes to make available those areas not previously logged, thus 'maintaining the sustainable yield' by moving the 'protected' areas around. Similarly, there are probably quite a few trees standing on steep land that

will 'sustain the yield', as will the implied relaxation of controls on logging intensity – although the current wording seems to have little control, clearing up the wording might save some face for those who must defend this on-going vandalism.

The inclusion of a half-baked reference to BMAD and that FC plays some role in the committee of that name serves only to show the contempt in which the actual health of the forest ecosystem is held. BMAD and spreading weeds are clearly a consequence of logging practices, but the firestick seems to be the only response FC is prepared to consider.

That the EPA intends to refer the 'design' of this vague new 'landscape approach' to that politically-appointed body, the FPA (Tas) shows that it has little regard for the social license under which these far-ranging and intensive logging activities depend upon for their acceptance by the people. The FPA (Tas) has no particular expertise in NSW forests, none in biological science or nature conservation, and apparently little care for the public acceptance of logging activities.

The forests are, after all, not quite privatised yet, although the secretive manner of the FC, and the highly anti-competitive nature of the timber allocations to influential corporations might lead one to conclude that they are privatised in all but tenure.

If this 'remake' is the best practice that can be achieved, then I will be forced to revise my long-held view that native forest logging can be ecologically sustainable.

In closing, there do seem to be a few worthwhile tightening up initiatives, but overall it looks like FC have the whip hand and are using it. I wish you the best of luck in holding the line.

Yours

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