



DOC22/256654 - 1

Ms. Linda Broekman  
Senior Compliance Manager  
Governance and Assurance  
Forestry Corporation NSW

By email

Date: 8 September 2022

Dear Ms Broekman

**Desktop compliance audit (Final) – Coastal Integrated Forestry Operations Approval (CIFOA) Protocol 1: Registers**

Please find a copy of the Environment Protection Authority's (EPA) Final Compliance Audit Report, attached. The audit assessed FCNSW's compliance with the requirements of the Coastal Integrated Forestry Operations Approval (CIFOA) Protocol 1: Registers.

EPA officers carried out a desktop audit of the registers (required under Protocol 1) on 13 September 2021. The EPA acknowledges your response dated 10 March 2022 which has been considered in finalising the audit report. It is noted that FCNSW has agreed to address most actions and take into consideration the areas for improvement. The EPA's comments on your response are provided as an Appendix to this letter and as an Appendix to the audit report with your comments.

The EPA audit was undertaken on information that was publicly available, which was the annual compliance register. The EPA did not audit the compliance layer, but only reviewed its content and made comments. The EPA welcomes FCNSW's willingness to discuss areas where there appears to be difference of opinion on interpretation.

A copy of the audit report will be made available on the EPA website (<https://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/compliance-audit-program>).

I would like to take this opportunity to thank you and your staff for the co-operation during the audit. If you require further information or clarification on any matters regarding the audit, please do not hesitate to contact me on 02 9995 5424.

Phone 131 555  
Phone +61 2 9995 5555  
(from outside NSW)

TTY 133 677  
ABN 43 692 285 758

Locked Bag 5022  
Parramatta  
NSW 2124 Australia

4 Parramatta Square  
12 Darcy St, Parramatta  
NSW 2150 Australia

[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dr. Wickremaratne', written in a cursive style.

**DR WINSTON WICKREMERATNE**  
**Head Environmental Audit**  
**Environment Protection Authority**

Attachment A: EPA comments on FCNSW's response to the draft audit report  
Attachment B: Final Audit Report



## Attachment A: EPA comments on FCNSW's response to the draft audit report

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
<b>Operations Register</b>			
(1) (a) – (d)	<p>FCNSW must keep a register of any of the following forestry operations which FCNSW plans to commence, has commenced, or has completed:</p> <ul style="list-style-type: none"> <li>(a) harvesting operations;</li> <li>(b) road construction;</li> <li>(c) road upgrading;</li> <li>(d) road maintenance.</li> </ul> <p><i>FCNSW are not complying with all the requirements of 1.2 for elements (a), (b), (c), and (d). FCNSW have combined forestry operations for (a), (b), (c), and (d) into Harvest Plan, Roading Plan and Harvest / Roading Plan.</i></p> <p>FCNSW must include a separate entry for each element of condition (1) (a), (b), (c), and (d).</p>	<p>We note that while technically possible, separating the elements of a roading operation into three (or more) plans that capture separate tasks that meets the definition of road construction, road upgrade and/or road maintenance would fail to achieve the objectives of the Coastal IFOA as the plans would be unable to provide effective instruction to the authorised person undertaking the whole operation.</p>	<p>Noted. However, no change has been made to the report.</p> <p>FCNSW must keep a register of any of the following forestry operations which FCNSW plans to commence, has commenced, or has completed:</p> <ul style="list-style-type: none"> <li>(a) harvesting operations;</li> <li>(b) road construction;</li> <li>(c) road upgrading;</li> <li>(d) road maintenance;</li> <li>(e) pre-harvest burns;</li> <li>(f) post-harvest burns; and</li> <li>(g) regeneration activities. <b>Or</b></li> </ul> <p>As these are requirements of the operations register, if there are difficulties in implementing the requirements, FCNSW must discuss relevant issues with the EPA and apply for a variation to the requirements.</p>
(c)	<p>The operations register must include the following information for each relevant forestry operation:</p> <p>(c) Coastal IFOA Subregion.</p> <p><i>FCNSW are not complying with condition 1.2 (2) (c). A Coastal IFOA Subregion is not listed for 4 of the 107 forestry operations.</i></p> <ul style="list-style-type: none"> <li>•• HPRP_TALLAGANDA_2451A_2021</li> <li>•• RP_TAMBAN_012_13_2021</li> <li>•• RP_TUGGOLO_22_23_2021</li> <li>•• RP_BULGA_60_61_64_66_2021.</li> </ul>	<p>Noted. This is an oversight and will be corrected.</p>	<p>Noted. No change has been made to the report.</p> <p>FCNSW must include any dates when a forestry operation recommenced (after being temporarily ceased).</p>

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
f (1)	<p>(f) (ii) any dates on which the forestry operation temporarily ceased and recommenced.  <i>FCNSW are not complying with condition 1.2 (2) (f) (ii). The register has a status field that includes approved, active, suspended, and completed; and a field for the date when forestry operations are suspended. However, it does not have a field for a forestry operation that has temporarily ceased has recommenced</i></p>	<p>It is not possible to display this data sensibly in a tabular format as there may be an unlimited number of cessations and recommencements associated with a single forestry operation. This information is provided in the status log in the Plan Portal via the link in the Operations Register, as was agreed with the EPA in June 2019.</p>	<p>Comments are noted.</p> <p>FCNSW must update the operations register to include the year of commencement of the previous harvesting operation or regeneration activity in the operational area, as required by the Protocol or  FCNSW must ensure that any agreements made with the EPA are referenced in the Public Register.</p> <p>Please note that whilst the email dated June 2019, contains a listing of discussion points that were agreed to during the meeting with the EPA, we note that there is no written acknowledgement/confirmation of the points agreed to during the discussion.</p> <p><b>Area for improvement:</b> Ensure that any agreement on requirements made verbally need to be fixed by a written agreement. The sending of an email with points agreed to during a discussion, legally, does not qualify as confirmed, unless the other party has sent a written confirmation of the points raised in the email.</p>
(g)	<p>(g) for a harvesting operation or regeneration activity, the year of commencement of the previous harvesting operation or regeneration activity in the operational area.  FCNSW are not complying with condition 1.2 (2) (g). The operations register does not have a field for the year of commencement of the previous harvesting operation or regeneration activity.  <i>The EPA notes that the link for the operational plan on operations register redirects to the plan portal on the FCNSW website and that the year of the last harvest or regeneration activity is included here.</i></p>	<p>It is not possible to display this data sensibly in a tabular format as there may be many subunits within the harvesting unit, each with a previous harvesting operation or regeneration activity date. This information is provided in the Plan Portal via link within the Operations Register, as was agreed with the EPA in June 2019.</p>	<p>As noted in the EPA draft report, the EPA is aware of the link that directs you to the required information. However, the public has no access to the plan portal nor does the public know what the link is.</p> <p>Furthermore, if the data to be presented cannot be displayed in tabular form, the requirement must be varied to enable this information to be displayed rationally. Requirements that cannot be complied with should be brought to the notice of the EPA and discussed/varied to ensure that the requirement can be complied with.</p>

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
( h )	<p>(h) the intensity of any harvesting operation (selective harvesting, intensive harvesting, alternate coupe logging and mixed intensity harvesting), including the estimated average basal area the stand will be reduced to.</p> <p>FCNSW are not complying with all requirements of this condition.</p> <p>FCNSW comply with the first part of this condition as the operations register has a field for the harvesting operation, which includes – selective harvesting, mixed intensity harvesting, and alternate coupe logging and all of the harvesting operations has an option of High, Medium or Low selected.</p> <p>FCNSW do not comply with the requirement to include an estimated post average basal area for any harvesting operation. The data has inaccuracies, there are 70 harvesting operations listed on the operations register as selective harvesting, mixed intensity harvesting, and alternate coupe logging, of these, 23 have an estimated post average basal area reduced to 0 or -1.</p>	<p>Forestry Corporation acknowledges that all harvesting operations should include an estimated post harvest average basal area in the operations register. Values of -1 or 0 are not acceptable. These are an oversight and are being corrected.</p>	<p>Noted. No change has been made to the report.</p> <p>Actions FCNSW must include the estimated average basal area that the stand will be reduced to for any harvesting operation.</p>
(i)	<p>(i) the inherent hazard level.</p> <p><i>FCNSW are not complying with condition 1.2 (2) (i). The register has a field for the inherent hazard level, however, contains incorrect data and the IHL does not apply to roading operations.</i></p> <p><i>The inherent hazard level (IHL) is crucial for determining the hazard risk for soil erosion and water pollution for harvesting (forestry operations). The IHL is categorised level 1 – Low soil erosion and water pollution hazard, level 2 - High soil erosion and water pollution hazard, Level 3 - Very high soil erosion and water pollution hazard, and level 4 - Extreme soil erosion and water pollution hazard – harvesting operations prohibited for this proposed method of timber harvesting and extraction.</i></p> <p><i>The operations register IHL field has a response for all 107 forestry operations, including roading, represented as -1, 0, 1, 2, with 8 forestry operations assigned a IHL -1, 1 forestry operations assigned a IHL 0, 28 forestry.</i></p>	<p>It is not possible to record text such as 'not applicable' or 'not yet assessed' within a numerical field without interrupting the mathematical functions using the data. This includes EPA functions.</p> <p>-1 is used to represent 'not assessed'. This is the default value.</p> <p>-2 is used to represent 'not applicable'. In the case of roading events, -2 is the correct value as the IHL does not apply.</p> <p>0 and -1 should not appear in this field. Operations assigned a IHL 0 or -1 are noted and are being corrected.</p> <p>Forestry Corporation acknowledges that the use of negative numbers to represent text may fail to meet the objective</p>	<p>Noted. No change has been made to the report.</p> <p>FCNSW must include an accurate inherent hazard level for each relevant forestry operation, as required by the condition 1.2 (2) (i).</p>

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
(j)	<p>(j) the total length of all new roads to be constructed.  FCNSW are not complying with condition 1.2 (2) (j). The operations register has a field titled <i>New_Road_Constructed_Total_Length</i>. However, this field contains incorrect data.  Every forestry operation has an assigned number in this field, including:</p> <ul style="list-style-type: none"> <li>• • 11 assigned a number of -2 and -1 km</li> <li>• • 74 assigned 0 km (of which 44 are roading plans or harvest / roading plans).</li> <li>• • 22 have greater than 0 km (6 of which are harvest plans).</li> </ul>	<p>It is not possible to record text such as 'not applicable' or 'not yet assessed' within a numerical field without interrupting the mathematical functions using the data. This includes EPA functions.  -1 is used to represent 'not yet assessed'. This is the default value.  -2 is used to represent 'not applicable'. In the case of road length, this value is appropriate for harvesting operations.  Forestry Corporation rarely constructs new roads as the forest estate is substantially accessible. 0 is appropriate if no new road is to be constructed.  Forestry Corporation acknowledges that the use of negative numbers to represent text may fail to meet the objectives of a publically available register and has implemented a fix.</p>	<p>Noted.  FCNSW must include an accurate total length of all new roads to be constructed for each relevant forestry operation, as required by the condition 1.2 (2) (j).</p>
(k)	<p>k) the length of new roads to be constructed with a grade greater than 10 degrees.  FCNSW are not complying with condition 1.2 (2) (k). The operations register has a field titled <i>New_Road_Constructed_Over_10_De</i>. However, this field contains incorrect data.  Every forestry operation has an assigned number in this field, including:</p> <p>10 assigned a number of -2 and -1 new km road length</p> <ul style="list-style-type: none"> <li>• • 95 assigned 0km new road (of which 59 are roading or harvest / roading plans)</li> <li>• • 2 have a greater than 0 new km road length.</li> </ul>	<p>It is not possible to record text such as 'not applicable' or 'not yet assessed' within a numerical field without interrupting the mathematical functions using the data. This includes EPA functions.  -1 is used to represent 'not yet assessed'. This is the default value.  -2 is used to represent 'not applicable'. In the case of road length, this value is appropriate for harvesting operations.  Forestry Corporation rarely constructs new roads with a grade greater than 10 degrees. 0 is appropriate if no new road over 10 degrees is to be constructed.  Forestry Corporation acknowledges that the use of negative numbers to represent text may fail to meet the objectives.</p>	<p>Noted.  FCNSW must include an accurate total length of all new roads to be constructed with a grade greater than 10 degrees for each relevant forestry operation, as required by the condition 1.2 (2) (k).</p>

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
(l)	<p>(l) the length of new roads to be constructed on ground slopes greater than 30 degrees  FCNSW are not complying with condition 1.2 (2) (l).  The operations register has a field titled <i>New_Road_Constructed_Over_30_De</i>. However, this field contains incorrect data. Every forestry operation has an assigned number in this field, including:</p> <ul style="list-style-type: none"> <li>• • 10 assigned a number of -2 and -1 new km road length</li> <li>• • the other 97 assigned 0 value for no new km road length.</li> </ul>	<p>It is not possible to record text such as 'not applicable' or 'not yet assessed' within a numerical field without interrupting the mathematical functions using the data. This includes EPA functions.  -1 is used to represent 'not yet assessed'. This is the default value.  -2 is used to represent 'not applicable'. In the case of road length, this value is appropriate for harvesting operations.  Forestry Corporation rarely constructs new roads on slopes greater than 30 degrees. 0 is appropriate if no new road is to be constructed on ground over 30 degrees.  Forestry Corporation acknowledges that the use of negative numbers to represent text may fail to meet the objectives of a publicly available register and has implemented a fix.</p>	<p>Noted.  FCNSW must include an accurate total length of all new roads to be constructed on ground slopes greater than 30 degrees for each relevant forestry operation, as required by the condition 1.2 (2) (l).</p>
(o)	<p>(m) the number of new drainage feature crossings to be constructed.  FCNSW are not complying with condition 1.2 (2) (m). The operations register has a field titled <i>New_Drainage_Feature_Crossings</i>. However, this field contains incorrect data. Every forestry operation has an assigned number in this field, including:</p> <ul style="list-style-type: none"> <li>• • 9 assigned a number of -1</li> <li>• • 2 assigned positive values</li> <li>• • 96 assigned as 0</li> </ul>	<p>It is not possible to record text such as 'not applicable' or 'not yet assessed' within a numerical field without interrupting the mathematical functions using the data. This includes EPA functions.  -1 is used to represent 'not yet assessed'. This is the default value.  Forestry Corporation rarely constructs new drainage feature crossings. 0 is appropriate if no new drainage feature crossings are to be constructed.  Forestry Corporation acknowledges that the use of negative numbers to represent text may fail to meet the objectives of a publicly available register and has implemented a fix.</p>	<p>Noted.  FCNSW must include an accurate number of new drainage feature crossings to be constructed for each relevant forestry operation, as required by the condition 1.2 (2) (m).</p>
(p)	<p>(n) the number of existing drainage feature crossings in the operational area.  FCNSW are not complying with condition 1.2 (2) (n). The operations register has a field titled <i>Existing_Draining_Feature_Cross</i>. However, the field contains incorrect data. Every forestry operation has an assigned number in this field, including:</p> <ul style="list-style-type: none"> <li>• • 8 assigned a number of -1</li> <li>• • 33 assigned 0 existing drainage feature crossings</li> <li>• • 66 assigned positive values</li> </ul>	<p>It is not possible to record text such as 'not applicable' or 'not yet assessed' within a numerical field without interrupting the mathematical functions using the data. This includes EPA functions.  -1 is used to represent 'not yet assessed'. This is the default value.  Forestry Corporation acknowledges that the use of negative numbers to represent text may fail to meet the objectives of a publicly available register and has implemented a fix.</p>	<p>Noted.  FCNSW must include an accurate number of existing drainage feature crossings in the operational area for each relevant forestry operation, as required by the condition 1.2 (2) (n).</p>

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
(q)	<p>FCNSW must update the operations register as necessary by the first business day of each calendar month and provide the EPA with full access to the operations register on that date. FCNSW are not complying with all the requirements condition 1.2 (6). The condition requires that FCNSW update the operations register, as necessary, by the first business day of each calendar month.</p> <p>For the purposes of this audit assessment, as necessary means when any deeming clause is activated, such as a status change to the forestry operations. There are 28 forestry operations with the status completed but only 25 forestry operations with a completed date. The 3 forestry operations without a completed date are tagged as completed on their plan details page.</p> <p>1. HP_BROKEN_BAGO_3_5B_2020 has been tagged as completed in the plan details page of the FCNSW website on 25 August 2021 (Completed Wed Aug 25 2021 14:54:42 GMT+1000 (Australian Eastern Standard Time)).</p> <p>2. HP_BROKEN_BAGO_1_BURRAWAN_9_2021 has been tagged as completed in the plan details page of the FCNSW website on 8 March 2021 (Mon Mar 08 2021 11:37:38 GMT+1100 (Australian Eastern Daylight Time)).</p> <p>3. HP_CAIRNCROSS_12_13_14_15_17_18_19_20_20 has been tagged as completed in the plan details page of the FCNSW website on 20 April 2021 (Tue Apr 20 2021 16:27:43 GMT+1000 (Australian Eastern Standard Time)).</p> <p>FCNSW have not updated the operations register as necessary by the first business day in the calendar month of September 2021 (Wednesday 1 September 2021).</p>	<p>We note that the CIFOA defines completion as the date that is entered into the Operations Register. By definition, Forestry Corporation cannot fail to comply with the requirement to update the operations register when an operation is complete</p>	<p>No additional information has been provided by FCNSW to change the audit assessment or comment.</p> <p>FCNSW must update the operations register necessary by the first business day in the calendar month as is required by this condition 1.2 (6).</p>



Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
<b>Compliance Register</b>			
	<p>e) name of person who caused the non-compliance; FCNSW are not complying with this element of condition 1.3 (1). The compliance register The compliance register does not include the name of the person who caused the non-compliance. FCNSW must enter the name of the person who caused the non-compliance into the compliance register within 14 days of it becoming aware of a non-compliance with the conditions of the approval. The compliance layer The compliance layer includes a field for the name of the person who caused the incident. however, 30 (27%) of 113 incidents in the compliance layer have no person causing the non-compliance listed.</p>	<p>As acknowledged in the Report, the audit has been conducted on the part of the compliance register that is made available to the public annually on our website, rather than the current compliance register (which is available to all parties at any time upon request). Forestry Corporation is not able to publicise the name of the person who cause the non-compliance due to privacy legislation. The name of the person who caused the non-compliance is recorded on the current compliance register. This is evident in the register that has been provided to the EPA when previously requested.</p>	<p>Noted The audit was undertaken on what was available on the Public register.</p>
<b>Appendix 1 Inconsistent interpretation of the protocol requirements</b>			
1.2 (1) (a) - (g)	<p>Interpretation of forestry operations For the purposes of this audit this requirement means a separate entry for each forestry operation listed (a)-(g). This is how EPA officers have interpreted the requirement. This does not seem to be the way FCNSW interpret forestry operations. They combine roading, and roading with harvesting for the purposes of this requirement. There are three slightly different definitions of forestry operations within forestry regulation, the Forestry Act 2012, the Coastal IFOA conditions and the Coastal IFOA protocol.</p>	<p>Protocol 39 defines 'forestry operations' as those listed (13.1(c)). FCNSW agrees to work with the EPA to define what is required under this requirement to comply with Protocol 1.2 (1).</p>	Action Noted
1.2(6)	<p>FCNSW have not updated the operations register on the 1st business day of September 2021 for all forestry operations. FCNSW must update the operations register necessary by the first business day in the calendar month. Forestry Corporation does not agree that it has failed to update the operations register.</p>	<p>Forestry Corporation does not agree that it has failed to update the operations register. The operations register is updated and made available to the EPA continuously. See also comments in response to Action 12. Nevertheless, a monthly version will be provided in the appropriate dropbox from April 2022 onward.</p>	Action noted.

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
1.3(1)	<p>Interpretation become aware of a non-compliance. The condition is ambiguous as to the meaning of 'aware of a non-compliance' with the Coastal IFOA. The condition allows for alternative interpretation. FCNSW are notified of incidents that may or may not be non-compliance upon review (see detailed assessment in appendix</p>	<p>Forestry Corporation is willing to discuss this interpretation, but note that we may have no disagreement. As acknowledged in the Report, the audit has been conducted on the part of the compliance register that is made available to the public annually on our website, rather than the current compliance register (which is available to all parties at any time upon request). The current compliance register is available to the EPA upon request, as required by Protocol 1.4(2).</p>	<p>Action noted.</p>
1.4(1)	<p>The complaints register includes a column for location description, the Protocol requires precise location of the alleged breach, harm to the environment or reportable harm</p>	<p>Noted. Forestry Corporation will update the column header to reflect the wording of the Protocol. We note that very few (if any) complaints contain a precise location as complaints tend to refer to particular forestry operations</p>	<p>Action noted</p>
1.2(1)	<p>78 Forestry operations in the planning stage are not entered into the operations register.</p>	<p>Protocol 1.2(1) requires Forestry Corporation includes Forestry Operations that they plan to commence. Forestry Corporation routinely undertakes planning activities for operations solely for the purpose of shortening the lead time if/when that operation was to be scheduled. Including these operations in the Operations Register would mislead the public in regard to our intentions. Only those operations that have an approved plan, signalling that we expect to commence in the foreseeable future are included in the operations register.</p>	<p>Noted, however, this issue needs to be discussed with the EPA and a mutually acceptable outcome is achieved.</p>

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
1.2(2)	<p>The operations register is missing some or all information, including:</p> <ul style="list-style-type: none"> <li>- Coastal subregion</li> <li>- The actual date of commencement of forestry operations</li> <li>- The date the Forestry Operations temporarily ceased/recommenced</li> <li>- The year of previous harvesting or regeneration activities</li> </ul>	<p>Coastal subregion: The four omissions are noted, and Forestry Corporation will correct.</p> <p>Actual date of commencement: while not required by Protocol 1.2(f)(i), Forestry Corporation endeavours to provide the actual date of commencement.</p> <p>Date temporarily ceased operations recommence: It is not possible to display this data sensibly in a tabular format as there may be an unlimited number of cessations and recommencements associated with a single forestry operation. This information is provided in the Status History in the Plan Portal via the link in the Operations Register, as was agreed with the EPA in June 2019.</p> <p>Year of previous harvesting: It is not possible to display this data sensibly in a tabular format as there may be many previous activities associated with the area of a single forestry operation. This information is provided via the link in the Operations Register, as was agreed with the EPA in June 2019.</p> <p>Completed date: The omissions are noted, and Forestry Corporation is working to correct.</p>	Action noted
1.3(1)	The compliance register is dated for the period 16 November 2019 to 16 November 2020	As acknowledged in the Report, the audit has been conducted on the part of the compliance register that is made available to the public annually on our website, rather than the current compliance register (which is available to all parties at any time upon request). There is no requirement, nor has Forestry Corporation committed, to provide a live version of the compliance register to the EPA.	Noted
1.3 (1) (a) – (k)	<p>The compliance register is missing requirements or incomplete information, including:</p> <ul style="list-style-type: none"> <li>- The name of the person who caused the non-compliance</li> <li>- Nature of noncompliance (detail)</li> </ul>	<p>As acknowledged in the Report, the audit has been conducted on the part of the compliance register that is made available to the public annually on our website, rather than the current compliance register. Forestry Corporation is not able to publicise the name of the person who cause the non-compliance due to privacy legislation.</p> <p>The name of the person who caused the non-compliance is recorded on the current compliance register. The nature of the non-comp provided; Forestry Corporation consider this sufficient detail to describe the non compliance.</p>	Noted

Requirement	EPA Comments on Non-compliance	FCNSW Response	EPA Comments on FCNSW Response
1.3 (1) (a) – (k)	<p>The compliance layer made available to EPA by FCNSW does not include all requirements (a) - (k). Presently missing requirements or incomplete information, including:</p> <ul style="list-style-type: none"> <li>- Approval conditions not complied with</li> <li>- Date and time</li> <li>- Notification date</li> <li>- Exact location</li> <li>- Names of persons who caused the non-compliance</li> <li>- Nature of non-compliance</li> <li>- Cause of non-compliance</li> <li>- Mitigate impact of non-compliance</li> <li>- Action taken to mitigate impact.</li> </ul>	<p>The Coastal IFOA does not require Forestry Corporation to make the compliance layer available to the EPA (except under statutory notice) or even to create such a layer. Further, there is no requirement for any specific fields to appear in the compliance layer. It is disappointing that the EPA do not consider voluntary provision of this data as a positive action</p>	<p>The EPA considers the voluntary provision of data a positive action on the part of Forestry Corporation.</p>
1.4 (1)	<p>There is only one complaint in the complaints register.</p>	<p>The complaints register is up to date. Forestry Corporation receive very few complaints that specifically allege harm (within the definitions in applicable legislation) or non-compliance with a condition of the Coastal IFOA. However, more than one complaint is visible in the register at our end. We will investigate and ensure that all complaints captured by the Protocol 1 requirements are visible to the EPA.</p>	<p>Action noted.</p>

.....

**NSW Environment Protection Authority**

Email: [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

Website: [www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

EPA 2022P4073

September 2022

The EPA [disclaimer](#) and [copyright](#) information is available on the EPA website.