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To The IFOA remake committee

I attended a meeting in Lismore regarding the approach to the remake IFOAs. Information was broadly given on the concept of what the government wants to achieve. They're where no new draft regulations shown, basically we were told about the plan of action the government would like to proceed to. Without knowing how a regulation might be changed, I am commenting on a couple of regulations that cause many problems for both the regulator and person implementing them in the field.

I agree that changes need to be made. It needs to be user friendly for all involved, for the person implementing it in the field to the person who regulates it.

The current regulations to me are far too complicated and difficult to implement and regulate. I hope that regulators take the attitude of less stick and more carrot towards people involved in harvesting with the new regulations. People respond to each other better when co-operation is practised.

I would like to see some regulations removed and others changed to reflect the difficult process of harvesting timber. Harvesting can be very beneficial to all concerned from animal, to plant to humans.

The landscape approach to the new IFOAs is a step in the right direction for all parties involved in timber harvesting.

How are we going to benchmark the new way of thinking?
Are we going to use the National Park estate as the benchmark for information?
We have to consider that a large percentage of the National Parks estate was once productive timber area.

We have to consider that the forest environment is a living habitat. We all know this. There are some who will not accept the fact of life and death, which all living things will die, one day.

I have witnessed where harvesting of a coastal forest actually increased the population of a particular species. There was a Park Reserve near by, represented of the harvest area, but because of the very thick understory this particular species could not be found.

Locking up vast areas of land is more like PRESERVATION, not CONSERVATION. There are areas that need reserving for their values, but to take away big chunks of land that was previously used for timber production makes no sense.

Outcome based monitoring as apposed to the old methods is a good decision and approach.

I you go back in time, in regards to past harvesting, the majority of people involved did a great job with the knowledge they had available to them at the time.

These people did such an incredible job, that many of these forests or sections, are now part of the NSW National Park Estate. They have even given some of these areas, the status of being called wilderness areas or high conservation reserves. That is some achievement for these people.

Take a look at the vast amount of productive forest that has been transferred into the NSW National Park Estate in the last 20 to 30 years. IT IS ENORMOUS.

When we take a look at available harvesting areas today, we find an estate that is very much smaller then in previous years. The government has what is called Timber Supply Agreements with industry, which the government is committed to supplying. These agreements with different companies have different time periods of supply

When then look closer at the harvesting coup or compartment, and we find the area we thought was going to be available for timber production becomes less. Heavily over regulated.

REMEMBER, timber is a renewable resource that has many various uses in our modern society.

Some of the issues that reduce available harvest areas within a coup or compartment are:

- : Old Growth areas
- : E.E.C. – Endangered Ecological Communities.
- ; Drainage Line Protection Buffers
- ; Wild Life Corridors
- ; Indigenous Artefacts / European Artefacts

This is only a small list of issues.

They are all extremely important, but are they required at the current level of intensity. Are they achieving any outcomes beneficial to the fauna and flora and to us?

My understanding and many others that I know, was that the establishment of all the new National Parks and expansion of others, was to have a representation of the above mentioned issues and others not mentioned protected. I believed the park estate was developed to represent all aspects of flora, fauna and other critical attributes.

Has this not been the case?

Was not enough research completed or even attempted, or was it a land grab by the environmental movement.

Why do available harvesting areas end up with less and less available for **TIMBER PRODUCTION?**

You take away productive land, and then throw in more regulations; it becomes difficult for those implementing policies.

If the outcome based monitoring is adopted for harvesting areas, then by having small reserves here and there within compartments, that is going to make it very difficult for Foresters to achieve productive outcomes for future supply of timber.

Example of Regulations.

Old Growth

Old growth areas within compartments that have been harvested before is a stand out regulation that needs to be removed. I have seen areas where there are old stumps, but you cannot harvest these areas, because of a rule regarding past harvest practises. They're where reasons why areas have had only a certain number of stems removed or had other treatments in the past.

No one would listen to the people that were involved in harvesting or other work, who had good knowledge of certain areas. The radical groups told the lawmakers what they wanted in terms of regulations, by using political pressure and other means. It was another regulation, made to retain more area and make it difficult for timber production now, and into the future.

There are areas within a percentage of compartments that because of natural features and other attributes naturally are unavailable for timber production. These areas naturally form small pockets of retained vegetation without regulatory involvement. A sample of this type of area could be visited years ago in a local forest near Casino, but now because of locked gates, it is now unable to be seen or visited even on foot.

E.E.C.s

This would appear to be another way to limit timber production. You put an E.E.C on some ones entire land or you place it within a harvesting coup.

You impact on some ones right to diversify income or you hamper timber production on state land.

The intent of any National Park is to reserve or protect something. Should not more care have been put into the establishment of parks to represent these areas within an area?

North Coast Forest Types: IT APPEARS THAT EVERY TYPE OF FOREST VEGETATION HAS BEEN RESERVED in the many parks we have today.

Question

Has the park estate failed to capture what is was intended to do, once again. Do we have to continually reserve areas within harvest areas to make up for a mistake in the placement of National Parks?

How can a person involved in timber production for the present and future contend with fragmented sections of a forest? A management nightmare.

The fundamental principles for the regeneration of harvest areas incorporates disturbance of some kind. It can be by fire, mechanical or the act of harvesting itself. If we continue to have reserves within these areas, that have certain conditions attached to them, then to regenerate areas properly around these areas becomes a

planning nightmare. People will not attempt it for the fear of being prosecuted in the event a reserved area gets disturbed through a regeneration method.

Culture Heritage / Aboriginal and European

It is very important to protect a lot of different values regarding culture heritage.

I did a lot of survey work many years ago with elders from different areas on the north coast.

One comment that has stayed with me was the remarks by elders in relation to the regulations regarding artefacts found in the forests.

They thought it quite unusual that we would put buffers around such objects as stone axes, spearheads or flints. Their comments to me were that implements and tools wear out. When they are no good any more, toss them away and make a new one. Some times even new ones are incorrect, or a fault with them, so they throw them away and start again.

Comments like this remind that we over regulate ourselves in many areas. Why not remove the item and place it on display.

As the elders have said, it's worn out or no good for intended purpose, that's why it is where it is.

I have also seen where we put buffers around old European implements. This I thought quite strange, as you can find many of the same rusting away under a tree on farm.

All of these regulations make it harder and harder for people to plan into the future for a continuous supply of Australian Native Hardwood. It is one of the best building materials in the world.

Timber production: from the bush, to the mill and to the customer. The industry employs many people. Then there is the secondary employment industry, the industries that assist and maintain the timber industry.

Wood, employs many. Extremely important to many areas in the state.

If we do not act sensible on the issues that concern many in the industry, there will be no industry in the future. May be that is the aim of the environmental movement, shut down native forest harvesting forever, through overregulating.

Do we start imposing the same regulations on plantations when something turns up? Animals cannot tell the difference between native forest and plantations, its all bush to them.

Surely we should have enough Parks to represent our native flora and fauna. How much do we need to lock up?

Can we not make the areas left for timber production a little less regulated in regards to a lot of regulations. I think the new code will go along to achieving this.

We need regulations and guidelines to work with, but the regulations need to be workable and have an outcome for all involved.

Yours sincerely

Jim Rankin.