

**From:** [REDACTED]  
**To:** [\\_ALL-EPA-Forestry-IFOARemake](#)  
**Cc:** [Jan Phillips](#)  
**Subject:** IFOA Remake  
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Thank you for the opportunity to comment on plans to redraw the Southern IFOA.

We can understand the Government's desire to reissue a standard document to cover forestry operations across the State but are concerned that any standardised document will result in reduced local applicability of conditions. There is much benefit to be gained by having governing rules for local situations covered in a local document. We will need to be convinced about the local benefits of the state-wide corporate document. The push to deliver a state wide planning code through the standardised LEP template process has seen many local imperatives watered down and other conditions varied to make them meaningless or non-applicable locally as a result of standardising template conditions. The standardised IFOA must continue to reflect local considerations.

We also have concerns that timber commitments will not be reviewed at the same time as the review of the operations approvals document. Present native forest operations are not only an environmental disaster but also result in an economic impost that our community should no longer be required to bear. The poor returns from native forest logging operations, the falling markets for products produced from such (including wood chips), the overwhelming public concern for the state of the forests as well as carbon / climate considerations coupled with the annual loss recorded from the native forest operations should lead to a review of such operations immediately. This would have been such an occasion.

That any consideration of removal of restrictions on the logging of steep slopes (>30 degrees) is bewildering. The only justification offered was that such would further the scope for the destructive native forest operations. Not only can this not be supported but as above, a review of the whole native forest logging operation with a view to winding back the present limits, should be undertaken before the IFOA remake is further proceeded with.

In casting about for input into the process of the review of the IFOA, we wonder how the Forest Protection Authority of Tasmania could ever have been seriously proposed as a source of balanced and considered input. We doubt the impartiality of that body to comment on NSW forestry regulations and approvals conditions. Rather, we suggest that that body /. committee responsible for the drafting and determination of the the present IFOAs, be called upon for comment on the changes now proposed. Further input could then be sought from a NSW scientific community-based committee.

Similarly, the makeup of the proposed EPA expert review panel should be determined with input from all stakeholders including the conservation groups from whom membership nominations should be sought.

Some useful information is presently provided about logging operations. Provision of the annual Plan of Operations and the Monthly Advice is welcomed to permit some public view of logging operations. We encourage the continued commitment to make such information freely available on a regional basis. Provision of further detail including costs of undertaking the logging and receipts for the products obtained would improve the community interest in the operations of FCNSW.

We further believe that all forest uses should be regulated by the approvals document. To reduce the oversight of the regulator to just timber production avoids the need to for better regulation of all forest uses and we call for the continuation of coverage of all uses by the IFAO.

Despite a supposed wide notification of the intent to undertake this IFOA review, we have been unaware of the process 'till recently. Comment on the draft document, should this process progress to that stage, will be important and efforts made to improve public participation. Please consider widely advertising the call for comment and specifically advise all who have made input to date.

Regards

Jan and Martyn Philips