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To the EPA,

Please accept the attached as a submission to the Integrated Forestry Operations Approval 'Remake' Discussion Paper.

The Wilderness Society (TWS) holds major concerns with both the objectives and specific aspects of suggested changes to the IFOAs.

It is our view that substantive demonstration is required that the ecological objectives of the Forest Agreement system, of which the IFOA is a component, are being achieved, before any change of the IFOA should be considered. As such, the current proposed changes are flawed and should be rejected until real data can be collected and provided – in itself a substantial and medium-to-long term undertaking.

At a principle level, the objectives of the Remake, which seek to reduce the regulatory burden with no net environmental impacts, make environmental protection subsidiary to industry outcomes. A more appropriate set of objectives would be to increase efficiency whilst ensuring that environmental values are actually protected; that is, performance is measured against ecological baselines and targets, not only compliance performance.

The historical reason for the creation of the IFOAs in their current form, and the acceptance by conservation groups that Ecologically Sustainable Forest Management (ESFM) may be achievable, was that a rigorous set of prescriptions and regulation would be applied to ensure conservation values were protected in production forests.

The Comprehensive Regional Assessment process identified a range of protection requirements for habitat, species, and forest types. The identified scientific reservation targets were in many cases not met. ESFM and its enabling instruments were to ensure - despite the lack of permanent reservation and the known impacts of logging – that conservation values were to be protected. To now seek to remove a range of carefully designed regulations, with no substantive efforts to increase reservation outcomes to achieve the CRA identified ecologically-required protections, is a backsliding on what was already a compromise approach to the management of conservation values in logged forests.

The Wilderness Society has a number of specific concerns with the proposal in the discussion paper, (though this is not an exhaustive list):

1. There is no clear basis for claims made regarding the ecological value or failure of particular prescriptions, given the lack of data monitoring the ecological health of the forests. While regulatory compliance and outcome data is being treated as a proxy for the effectiveness of prescriptions, there is no objective basis for assessing the failure or success of current prescriptions.

Given the careful and comprehensive design work that established the IFOA system, in the absence of clear evidence and given the Remake objectives, no substantive changes should be made in the absence of real monitoring data. Conservation groups have regularly highlighted the failure to monitor ecological outcomes, including as demonstrated through RFA reviews. A comprehensive monitoring program should be established in order to a) assess ecosystem health and function and the maintenance of conservation values and b) fully assess the effectiveness of regulation to provide clear and substantive evidence for future proposed changes.

2. A move to a 'Landscape Approach' is flawed without a data-driven analysis that ensures permanent and increased protection in reserved areas that improves and compensates for any changes in specific prescriptions and regulations. A landscape approach that serves merely to reduce important prescriptions, save money, reduce compliance costs and increase wood volume availability, whilst counting already extant protection outcomes in reserves as sufficient to deliver conservation objectives is a fundamentally flawed approach.
3. The removal of all harvesting system prescriptions is a quite extraordinary change. There has been significant work to identify appropriate forms of harvesting in different forest types. To leave the harvest type entirely at the discretion of the forest manager dramatically increases the risk that ecological values will be damaged due to overly-intensive harvesting or logging that is inappropriate to a site or forest type.

Thanks for your time and the opportunity to provide comment.

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