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Remake of the Coastal IFOAS  
Environment Protection Authority  
PO Box A290  
SYDNEY SOUTH NSW 1232

By email: [ifoa.remake@epa.nsw.gov.au](mailto:ifoa.remake@epa.nsw.gov.au)

Dear Sir/Madam

**RE: SUBMISSION TO THE REMAKE OF THE COASTAL INTEGRATED FORESTRY OPERATIONS APPROVALS (IFOA) DISCUSSION PAPER – FEBRUARY 2014.**

I wish to make this submission in response to the public consultation.

The IFOA contains the conditions that Forest Corporation NSW and its harvesting contractors must comply with in order to conduct forest operations and deliver wood to the native forest industry. This remake as outlined in the discussion paper will reduce complex duplication of regulation that is costly to administer and implement and should deliver the best environmental outcomes and efficient forest production.

- 2.1 The objectives of the IFOA remake are clearly stated along with a commitment to “no net change to wood supply and no erosion of environmental values”. However through erosion of harvestable areas the quality, size and species mix made available to the industry has declined. The NSW government should as part of the principle of triple bottom line accounting, strengthen this commitment to ensure that the forests made available to regional wood processors are economically viable to harvest and that the standard or quality of the mix of timber that they produce will be maintained
- 2.2. The scope of IFOA remake is clear and valuable. The EPA should strive to achieve consistency across the state.
4. The NSW forestry planning framework is complex and not user friendly which causes confusion and leads to perverse outcomes. Any stream-lining and clarity that can be provided to the IFOA remake is welcomed.
- 4.3. Clarity for regulators and those engaged in forestry operations is long overdue and rationalization to one all-encompassing licence is welcomed.
5. The proposed aims of the IFOA structure are commendable and harmonizing regulatory conditions to one licence is welcomed.

- 5.1. The remake IFOA and licence structure to reduce prescriptions, provide clarity to intent, contains best-practice protocols and guidance material, introduces greater flexibility, is outcome-based, has a landscape focus, is easier to implement and improves enforceability is welcomed.
- 5.2. Regulatory approach under the new coastal IFOA is supported
- 5.3. The proposal for the introduction of minimum competencies for forest contractors is supported for reasons of efficiency and continuous improvement.
6. The areas to be covered by the IFOA are noted.
7. Landscape-based protection for threatened species and communities is noted and welcomed. However reassurance is sought that Threatened Ecological Communities (TEC) and Endangered Ecological Communities (EEC) will not be systematically expanded as a method of further eroding the area available for harvesting. A system of replacing an area removed from harvesting as a result of newly established TEC and EEC with another area for harvesting is recommended.
  - 7.1. Weaknesses in managing impacts on TS and communities are surveys are costly for specific species and do not end up protecting much more habitat than is covered under general landscape reservations. Numerous examples given. Threatened ecological communities not currently covered in IFOA.
  - 7.2. Move to multi-scale landscape-based protection for TS and TC with general licence conditions will provide for strategic landscape scale habitat protection to include TS protection provisions within the broader landscape.
  - 7.3. Developing the licence framework for Threatened Species and Communities effective application of landscape scale management principles is welcomed and will enable disturbances by harvesting and burning to be integrated with other natural disturbances and subsequent recovery.
  - 7.4. Bell Miner Associated Dieback is a growing problem in forest/park areas which requires further research and implementation of programs to reduce the infestation of psyllids and subsequently control the rapid population growth of Bell Miners.
- 8.2. Proposed changes to soil and water protection components of IFOA will reduce the number of licence conditions, remove duplication and reduce the prescriptive nature which will lead to greater clarity and standardization.
- 8.3. A steep slope harvesting trial is proposed and supported.
- 9.1. LiDAR and Geonet technologies will provide more accurate stream mapping and boundary marking should assist in removing the “in-built buffer” system.
10. A new strategic environmental monitoring environment should as a priority utilize the opportunity for the introduction, management and maintenance of a landscape scale strategic forest monitoring system that is designed using sound scientific principles for use across all land tenures.

We endorse the submission from the NSW Forest Products Association.

**Additional points we would like considered in the remake of the IFOA:**

- The IFOA remake is an opportunity to take a broader look at the things which most threaten forests values namely introduced and native pests, weeds and diseases and altered fire regimes.
- For too long environmental, social and economic issues have been considered in isolation of one another. This review represents a good opportunity for the government to develop a new governance system which integrates and balances environmental values with social and economic interests.
- Under the current regulatory framework there is no consistency in the way human-induced disturbance events are regulated and managed and no monitoring of their relative impacts. For example, around 31,000 hectares<sup>1</sup> (<2%) of State forest are annually disturbed by selective timber harvesting (this includes western Cypress forests). In comparison, wildfires burn an average of 280,000 hectares (4%)<sup>2</sup> per year of National Parks and Reserves. Over half of these wildfires are human-induced (not started from natural causes). In the aftermath of disturbance events such as wildfire and harvesting, native fauna and flora are more exposed and susceptible to invasive pest and weed threats. There is a strong case for government to look more holistically at all agents of human-induced forest disturbance, their relative impacts and mitigation measures.

<sup>1</sup> Forestry Corporation Annual Report 2012-13

<sup>2</sup> OEH (2012) Living with Fire in NSW National Parks: a strategy for managing bushfires in national parks and reserves 2012-2021.

Thank you for your consideration of our submission.

Yours faithfully



**ANDREW HURFORD**  
Managing Director