

Remake of the Coastal IFOAS
Environment Protection Authority,
Level 12 PO Box A290
Sydney South NSW 1232

Email: ifoa.remake@epa.nsw.gov.au

Submission to the Remake of the Coastal Integrated Forestry Operations Approvals (IFOA) Discussion paper – February 2014.

**Norman Wilton
Wilton Logging Pty Ltd
2 A Kanangra St
Pambula Beach
2549.**

Wish to make this submission in response to the public consultation held in Eden.

1. Compliance of the new IFOA will certainly come at a cost to all government bodies as well as log processing, timber manufacturing & harvesting contractors.
Politically driven cost cutting for the implementation is seen as another measure to pass more pressure onto industry.
Cost cutting measures, where feasible, are prudent & good business sense as long as there is recognition that if industry is to share in the benefits & where extra work to achieve those goals is required, remuneration should be forwarded to the affected parties.

2. All government agencies associated with the IFOA should recognize a consistent approach to, rules that regulate the timber industry, are interpreted the same by all parties to achieve a joint approach for consensus.
There seems to be very little agreed upon when forestry audits take place, particularly in the areas of buffer zones & rocky outcrops.
Training should take place to align the FC NSW & EPA on the same wave length.

3. Industry will have a wait & see approach to words of the affect that there will be “no nett change to wood supply & maintenance of environmental benefits”.
Change & strengthen the prescriptions to reserve more in the areas of high habitat & not lower in lesser habitat in the coupe planning is a sure way to lose resource.

4. Change to best forest practice , through the new IFOA , should achieve environmental outcomes as well as simplify & enhance the everyday working operations experienced by FC NSW , SFOs as well as logging operators.

2.1 The objective, of the IFOA remake, is the commitment to “ no nett change to wood supply & no erosion of environmental values”.
Through loss of harvesting areas the size, quality & species mix is not always acceptable to industry.

Areas made available to harvesting should be economically viable & species mix & quality should be maintained.

2.2 Consistency of the IFOA remake is clearly welcomed by industry to achieve the desired outcome across the state.

4. Forestry planning is certainly outdated & hard to follow. A more clearer & user friendly version through the IFOA remake is long overdue & will be a lot easier to implement in the field.

5. The aims to streamline the IFOA makeup is welcomed by this company to restore balance to public forest management in NSW.

5.1 To reduce prescriptions in the IFOA remake & provide clarity, best practice prescriptions & guidance material, provide a more flexible outcome which is landscape focused, will be easier to implement & enforce. A system that seems to work in other states.
A commonsense approach through Best Practice regulation is long overdue, not necessarily what is written in the regulation will get the desired outcome.

5.3 The introduction of minimum competencies for forest contractors is regarded a priority in the forestry industry. To disregard this could lead to OH&S prosecution for lack of operator training from Workcover.

7.Landscape based protection for, threatened species & communities , is welcomed, however, the area open to logging could be diminished due to this.
This could result in lost timber resource which should result in a tradeoff to another area that is outside the TEC & EEC criteria.

7.1 Weaknesses in managing impacts on TS & Communities.

The introduction to move to greater landscape protection could have the potential of loss of resource due to more habitat reserves.

7.2 Landscape based approach is welcomed.

The EPA & FC NSW should reach consensus on determining the factors that, effect harvesting operations, instead of having differing interpretations of the guidelines. e.g.rocky outcrop protection.

7.3 Agree with the principle to regenerate the forest by harvesting, fire & soil disturbance, to recover over time to its former state.

7.4 Dieback , due to Bell Minor Infestation, is an area that needs immediate attention due to the loss of our forests, especially around buffers, filter strips & drainage lines.

Recommend that studies carried out by Vic Jurkis, a forester at Eden for many years, be used as a guidance tool to assist implementation.

8.1 Forest road drainage flexibility changes are long overdue. Guidelines have become outdated & don't reflect best practice when used in the field. A commonsense approach is welcomed, especially by logging contractors, to eliminate unnecessary & costly drainage works that a lot of times is inefficient.

8.2 A greater streamlining of the licence conditions will result in a more efficient framework for all government departments & logging contractors to follow.

9.2 Whilst welcoming the change to this system, the question that needs to be asked, is by whom will these exclusion zones, using GPS or Global Navigation Satellite Systems, be done by. At a cost saving to FC NSW of approximately \$1.5m per year, if the boundary location is passed on to the logging contractor there should be a recognition of cost to follow for that service. FC NSW recognized there is a cost involved for SFO to paint H & R trees, yet, if tree selection is done by machine operator, no cost is recognized.

10. It is recommended that the NSW Government not only monitor State Forests but over all land tenures. Whilst forestry operations are constantly in the spotlight a uniform approach to monitoring would be welcome by all industry.

Areas that could be monitored after major events are fires, both man made & naturally by lightning strikes, as well as floods events. These events could lead to huge environmental damage.

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Norman Wilton

Master Tree Growing .The University of Melbourne.

Harvesting Contractor 27 Years.

Native Regrowth Forest Harvesting 42 Years

