



**TIMBER NSW**

7 November 2019

Coastal IFOA Monitoring Program  
Natural Resources Commission  
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**Re: Submission on Draft Coastal Integrated Forestry Approvals Monitoring Program 2019-2014**

**1. Is the proposed monitoring program asking the right evaluation and monitoring questions? How can they be improved?**

The evaluation and monitoring questions detailed in the proposed monitoring program can be improved. Timber NSW (TNSW) have identified four ways in which this can occur:

- i. By being more upfront about the limitations as to what can realistically be answered and the relevant timeframes to do so.

If the questions posed by the monitoring program were easily addressed this would have occurred already. Native forests and the ecosystems which they support are inherently complex. This makes the process of matching cause and effect very difficult, particularly in attempting to meet 5 yearly reviews and subsequently implement adaptive management. In many cases, there is no single answer to a question and where answers can be obtained, they are conditional upon the context and variables of the site where they are being monitored.

- ii. By more tightly defining the meaning and intent of the questions.

Most of the proposed questions are loosely defined and open to interpretation (i.e. they mean different things to different people). The general nature of many questions gives the impression that the program will deliver much more than it is realistically capable of doing. This will likely see many stakeholders disappointed when the outcomes fail to meet expectations. Leaving the scope and scale of the questions undefined also means that they will be open to alteration/refinement. This will likely occur without transparency, which we don't believe is in the best interest of the program.

- iii. By being more honest about the challenge of developing robust baselines. For most questions there is not a sound baseline or benchmark against which findings can be objectively assessed. Our impression is that the draft program is attempting to fast-track the process by utilising data for its baselines that is not fit for purpose and will not meet the required quality standards. This approach will ultimately prevent the program from meeting its objectives and lead to its failure in the longer term.

The program acknowledges that it is reliant upon 'landscape-scale' data to use as its benchmark for flora and fauna questions. What it doesn't acknowledge is that in many cases this data does not yet exist. The collection of this missing data will be dependent upon the implementation of the Landscape Monitoring & Improvement Program and may require at least 5-10 years of monitoring before the baselines can be set.

In particular, to answer the trend monitoring question "is the Coastal IFOA having a neutral, positive or negative impact on landscape-scale environmental values", it is necessary to firstly understand what is happening at the landscape level and secondly to answer the same question in relation to the impacts of forest management for conservation across all tenures. It is impossible to do this unless both programs are established concurrently.

iv. By comprehensively embracing the principles of ESFM.

ESFM requires consideration of the full suite of forest values. At present, the draft monitoring program is heavily biased toward environmental protection values.

From a wood production perspective, there needs to be greater detailed consideration of what constitutes sustainable timber supply. In particular, under 'Monitoring regenerating forests' the public needs to know how the IFOA tree retention conditions are effecting the regeneration and development of trees that are being relied upon for future wood supply. The following questions would assist in addressing this need:

- What proportion of the retained stand is contributing to future wood production versus environmental protection?
- What is the condition of the crown of the trees which are being retained to 'grow' into sawlogs?
- What proportion of the space being created for regeneration is dedicated to the unimpeded growth and development of future crop trees?
- To what extent are trees 'permanently' retained for environmental protection impeding the growth and development of regeneration and future crop trees?
- Where and to what extent can wood productivity be improved without eroding environmental conditions?

Under the 'Species-specific monitoring-fauna strategy, it is important to know where timber harvesting is having a positive effect on fauna species and over what period of time (e.g. Hastings River Mouse).

Under 'Monitoring forest structure and health', it will be important to ask the following questions:

- Does the requirement to maintain a mosaic of forest age classes (landscape heterogeneity) effect in any way the ability of the Forestry Corporation to maintain; continuity of log supply, and a predictable log species mix.

Under 'Catchment-based waterway health monitoring' and 'Species-specific monitoring – flora and fauna' answers to the following questions are needed;

- Which exclusion zones are 'over-performing'? For example:
  - Are 10 metre riparian exclusions adequate when the current requirement is for a 20 metre zone?
  - Is a 20 metre buffer zone adequate for a threatened species when the IFOA specifies a 50 metre buffer zone?
  - Are the conditions and protocols applying to large forest owls greater than what is needed? How are the requirements impacting on the ability of Forestry Corporation to schedule operations in time and space?

Important questions under 'Independent evaluation of forestry practice' include the following:

- Are restrictions on pre-and post-harvesting burning preventing the effective control of invasive weeds?
- Is the retention or restriction on the sale of residues (course woody biomass) creating a fuel hazard risk and putting key habitat features at risk?
- Is the proposed level of expenditure on IFOA monitoring and audit appropriate? Could it be done more efficiently or at lower cost without eroding environmental values?

Under the proposed 'Research program' the following question could be included:

- How does the cost of implementing the Coastal IFOA compare to other native forestry regulation around the world?

## **2. Are the broad monitoring strategies and their indicative design heading in the right direction? How can they be improved?**

TNSW is concerned about the indicative design for monitoring sustainable wood supply. We remain unconvinced that the proposed methodology will provide results that are meaningful (statistically defensible) at an operational scale. There are concerns about accuracy and precision as we know that FRAMES estimates of high quality log yield have a PLE of +or - 30% at the regional scale. TNSW can only assume that when aligning FRAMES data to tactical-scale field assessments the PLE will be no better than this? In short, the industry needs more detail to be provided to us before we can be convinced that the proposed method is fit for purpose.

In addition, we are concerned about the ability to accurately map harvest and non-harvest areas dating back to 2003 (to calculate actual yields for the baseline). Although the current method used by FCNSW to calculate harvest area is robust, TNSW is also aware that 5+ years ago, FCNSW was reliant on manual mapping methods that were far less accurate.

As proposed in our response to question 1, the program needs to consider a much broader suite of questions that vigorously test the premise that sustainable timber yield is being maintained or enhanced. The program needs to go much deeper than simply trying to

match FRAMES estimates to actual yields. Multiple lines of evidence are required to reveal the true picture about the productive state of State forests. This revised approach will require the collection of a suite of data on silvicultural attributes from on-ground plots.

### **3. Are there any other priority issues the monitoring program should focus on?**

The monitoring program should give greater attention to the requirements contained within the Regional Forest Agreements (RFAs). The RFAs include requirements for monitoring that demonstrate how social and economic benefits are being achieved.

The monitoring program should consider tracking regulatory cost. Despite having no meaningful input to the Coastal IFOA Remake, the timber industry has been saddled with its cost. This cost is passed on by the Forestry Corporation through its delivery charges, administration fee and stumpage rates.

An important monitoring and evaluation question relating to cost is:

- Are the new conditions and protocols contained within the Coastal IFOA affecting the cost of delivery charges, administration fees and stumpage rates?

### **4. What are the priorities for the detailed design of the monitoring strategies?**

The priorities for the detailed design of the monitoring strategies must be broadened to capture the additional evaluation and monitoring questions proposed in question 1 above. TNSW is available to review the detailed design for these additional questions once they have been drafted by the NRC.

### **5. General Remarks**

TNSW notes there are 9.3 million hectares of coastal native forests in the RFA regions and that only 15,000 hectares or 0.16% is annually subject to (public) timber harvesting. Over a 20-year period this equates to just 3.2% of RFA forests. TNSW notes that despite this small footprint, it is proposed to allocate about the same money (\$1.8M per year) to both the Landscape and IFOA monitoring programs. This budget equates to \$120 per hectare for IFOA Monitoring and \$1.80 per hectare for Landscape Monitoring. We regard this as a massive disparity. In spite of the preferential funding, we expect the benefits of the Landscape Monitoring Program will far outweigh any benefits which arise from IFOA Monitoring.

Despite the assurance given to TNSW by the NRC at the Sydney briefing on the Landscape and IFOA monitoring programs that the \$7.2M allocated to the Landscape Monitoring program has been quarantined from the Coastal IFOA monitoring program, TNSW remains unconvinced given that the funding forms part of the budget discussion in Section 1.3. The budget discussion on trend monitoring only mentions establishing a cross-tenure plot network within the Coastal IFOA region and does not refer to the monitoring program including outside that region, such as forests in the western region, River Red Gum forests or the National Parks surrounding the Sydney Basin.

TNSW's concerns are further highlighted by reference to diverting the \$2M funding already allocated to the NRC for old growth remapping to establish wood supply baselines (page 14).

At the time of writing, over eighty wildfires are burning on the NSW north coast. These fires have consumed more than 500,000 hectares of native forest and will be transformative in terms of their impact on forest structure and biodiversity (esp. koalas). They are also likely to impact upon wood supply. While the north coast forests burn, TNSW finds it difficult to fathom why the Government is giving priority to IFOA monitoring over landscape monitoring, particularly with the need to landscape baselines.

In its public submission dated 4 July 2019 Timber NSW commented on the Program's governance structure and highlighted the need for greater transparency and accountability. Yet again it is disappointing to find that none of our recommendations have been adopted. TNSW is genuinely trying to assist the NRC to improve its programs.

TNSW again records its concerns over the direction this program is taking from its original pilot program in DPI Forest Science and equally whether the NRC is demonstrating the objectivity and transparency required of an independent agency. The monitoring of the Coastal IFOA is a "business as usual" requirement and TNSW again registers our disappointment that implementation of the Landscape Monitoring component of the NSW FMIP has taken a far lower priority to work that should already have been planned and in progress.

As mentioned previously, the baseline information for the Coastal IFOA monitoring and the NSW FMIP as a whole, can only be achieved through the earliest implementation of the State-wide cross tenure plot network. TNSW believes there is undue importance given to focusing on the State forests within the Coastal IFOA region, rather than implementing the Landscape Monitoring across the vast majority of public forests both within and outside of the Coastal IFOA region. The installation of the full NSW FMIP cross tenure plot network should be given priority and done in advance of the implementation of Coastal IFOA monitoring.

Timber NSW member companies employ a wide range of highly qualified professionals with lifetime careers in forestry science and forestry operations and under those circumstances it is important that the NRC adopts a less dismissive approach to the ideas offered by TNSW and its members in submissions.

Yours sincerely



Maree McCaskill  
**General Manager**