



We are now accepting email submissions. The form below must be filled out and attached in an email and sent to [ifoa.remake@epa.nsw.gov.au](mailto:ifoa.remake@epa.nsw.gov.au) If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.

**Make a submission – Contact Details**

**First Name\*:**Cath

**Last Name\*:**Eaglesham

**Phone:**

**Mobile\*:**

**Email\*** [REDACTED]

**Postcode\*:** [REDACTED]

**Country\*:**Australia

**Stakeholder type (circle)\*:**

Community group	Local Government	Aboriginal group
Industry group	Other government	Forest user group
Environment group	Individual	Staff

**Other, please specify:** concerned citizen

**Organisation name:**

**What is you preferred contact method (circle):** Mobile, Email or phone?

**Would you like to receive further information and updates on IFOA and forestry matters?**

yes

**Can the EPA make your submission public\* (circle)?**

Yes    No    Yes, but anonymous

yes

**Have you previously engaged with the EPA on forestry issues?**

yes



### Make a submission – Form

#### 1. What parts of the draft Coastal IFOA are most important to you? Why?

As a citizen of New South Wales, I am extremely concerned that the current New South Wales government would want to increase logging intensity throughout our public native forests and open up oldgrowth forests protected in informal reserves for logging. The IFOA is an attempt to hoodwink the public by re writing the logging rules. The draft IFOA removes protections for threatened species, including the need to look for real Koalas and extends Regional Forest Agreements (RFAs) indefinitely.

The RFAs will extend unsustainable wood supply agreements with saw millers for another 20 years. Ecological communities will suffer with the establishment of a 140,000 hectare North Coast Intensive Zone. Moist forests will evolve into quasi plantations predominately black butt. Large scale unsustainable industrial logging practices are unethical for our precious environment, climate, waterways, biodiversity and the communities of North Eastern NSW.

In light of climate change, I find the draft IFOA, utterly inconceivably disgraceful. The science is in on climate change there was an absence of carbon sequestration targets in the IFOA. The rights of nature are important to me and many others, there is a lack of legal rights to nature in the IFOA. Only death sentences for endangered, vulnerable and threatened species. To what end?

The IFOA is a clear indication of how out of touch the current NSW government is with the rest of the world. Their desire to reduce critically important stream buffer zones reduces the logging rules to mere guidelines. Clear-felling our public native forests are abhorrent. I recognise that the benefits of non-timber forest values are vital for the future of regional economies and ecosystems.

#### 2. What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?

I could not see any positive outcome on the management of environmental values or the production of sustainable timber. I read of intensive harvesting. I call upon you to recognise that the RFAs have failed to deliver environmental protection or industry security. The establishment of the Great Koala National Park is an immediate priority. Ensuring that our public native forests are managed for the public good is essential. Stop planning to log areas protected as habitat for threatened species, koalas, rainforest, oldgrowth forest and stream buffers.



**3. What parts of the draft Coastal IFOA do you think have a negative outcome on the management of environmental values or the production of sustainable timber? Why?**

I consider the whole document to have a negative outcome on the management of environmental values. Propping up the voracious native forest logging industry is a detrimental outcome. The RFAs have failed to deliver environmental protection or industry security. Logging our wildlife away is very undesirable. For north east NSW the intent is to remove the need to survey for and protect 22 threatened fauna; nine mammals, six birds, six frogs and one reptile, with prescriptions only retained for fourteen species is unacceptable. Overall 228 threatened flora species will lose all protection and twenty eight species will have reduced protection.

Legalising clear felling is incredibly destructive. Reduced stream flows, diminished stream buffer zones and water quality, are all negative outcomes. The scientific evidence is that we should be increasing stream buffers to 30 meters not reducing them to 5 meters.

The draft coastal IFOA has a tremendously negative outcome on the management of environmental values for our public native forests.

**4. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?**

My view is that the IFOA is completely ineffective at any level of protection for threatened species or their habitats. We need to follow New Zealand's lead in exiting native forest logging and transitioning to an industry based on 100 per cent plantation timber. I live in Bellingen Shire, and myself along with many other concerned citizens have anxieties regarding the draft IFOA document which indicates a doubling of logging intensity in our local public native forests. The impact on Bellingen's water supply, from clear felling in our catchments would be disastrous. We have big rain events with major flooding; we have already witnessed the impact of logging on our rivers. Clear felling our catchments would result in more sediment entering our river systems during big rain events.

We could add to the regional economy by moving from extraction to biodiversity protection, better management of water catchments and eco tourism. In my home town of Bellingen on the mid north coast, there is significant support for substantial koala reserves based on high quality



koala habitat before it is all intensively logged away. The plans are drawn up for a visitor's information centre and koala hospital at Pine Creek on the Pacific Highway as part of the Great Koala National Park.

Furthermore, the implementation of the Great Koala National Park has the support of the Bellingen Shire Council. Recently, Bellingen Shire Council voted to communicate its concerns about the draft revision of the IFOA to both the NSW and Federal governments

**5. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?**

The intent to log oldgrowth forest and rainforest protected under the CAR reserve system for the past 20 years is strongly objected to. All oldgrowth and rainforest must be assessed based on the full suite of environmental values and reserve targets they contribute to the Comprehensive, Adequate and Representative reserve system, not just oldgrowth targets.

The proposal to reduce buffers in headwater catchments down to 5 meters is strongly opposed. All riparian buffers, and riparian habitat for threatened species, protected over the last 20 years, is vital habitat and must remain protected. The draft IFOA must be altered to at least meet the promise that the 10 meter riparian buffers will be implemented on all streams in the intensive logging zone in catchments less than 20 hectares.

The intent to reduce hollow-bearing tree retention requirements and the removal of requirements for recruitment trees is also strongly objected to. The aim should be to restore hollow bearing trees throughout the forests as quickly as possible. Innumerable species rely on hollow bearing trees. Furthermore, the removal of the need to protect eucalypt feed trees would be detrimental to regent honey eaters and swift parrots which are both critically endangered. Therefore, the requirement to protect sound and healthy mature/late mature individuals of the most important nectar producing eucalypt species must be restored.

The need to undertake pre logging surveys and apply appropriate protections for all threatened species currently requiring prescriptions must be fully restored. The identification and exclusion of logging from occupied core koala habitat across all land tenures has to be the highest priority if the ongoing decline in koalas is to be halted. Surveys to identify occupied high quality koala habitat needs to be undertaken by independent experts with the full extent of koala home ranges excluded from logging.





## 6. General comments

I helped saved old growth and rainforests 20 years ago so my grandchildren would be able to experience their uniqueness and to ensure threatened, endangered and vulnerable species could have a better chance of survival. Now you think that you can change those protections. In my opinion, our public native forests should be valued for the role they play in carbon sequestration, which is vital in combatting climate change. The Regional Forest Agreements that were put in place 20 years ago to conserve Australia's forests while permitting logging have failed entirely. The RFAs have seen the loss of forests and sustainable jobs for forestry. We now have an opportunity to shift from destructive logging practices to conservation of our public native forests.

Surely the government should be seriously considering commencement of the Great Koala National Park to add to the local economy and save our iconic koalas. The Bellingen Environment Centre has architectural plans for the building of a visitor's centre and hospital for koalas included in the Great Koala National Park. The Bellingen Council has voted in favour of the great Koala National Park. I reiterate that the Coastal IFOA would be a complete disaster as previously protected areas will be logged, habitat will be destroyed and biodiversity will be irreversibly damaged.

Forests add value to our lives in so many ways.