



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 If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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*: Marg

Last Name*: Mclean

Phone: [REDACTED]

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:

Organisation name:

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

email

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?



Make a submission – Form

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

The fundamental important part that I recognise is the obvious assumption that it is apparently deemed OK to keep pretending that there could be ecologically sustainable timber production from our public native forests, that there is no issue of biodiversity conservation and environmental degradation in NSW and that climate change does not matter. I do not regard these premises as valid, they are tantamount to a death wish, they produce behaviour like lemmings going over a cliff.

The management of the public forests must be in the public interest. Forestry Corporation cannot continue to extract timber at the great environmental cost that is already apparent from the intensity of operations over the past 20 years. **It is important to me that this draft document is not implemented.**

The Ecologically Sustainable Management of our Forests underpins the chances for a viable future for the intricate web of life that depends upon them. Logging the public forests under this draft Coastal IFOA is not in accord with the principles of ESFM. The expressed intention to pursue 'endpoint logging' (see attached scanned page from Harvest Plan) over vast areas to create even aged stands of the preferred commercial timber species, or quasi-plantations, would also create deserted landscapes of gliders and hollow-dependent species

I am particularly concerned at the long term effect on the environment and the cumulative loss of hollow bearing trees.

Experts are also as recorded in "The Remake of the Coastal Integrated Forestry Operations Approvals Final Report Threatened Species Expert Panel Review" (page 52/60)

For example, a significant constraint on many species is the increasing rarity of tree hollows across the Regrowth Zone. In NSW, about 46 mammals, 85 birds, 32 reptiles and 16 frogs are reliant on tree hollows for shelter and nesting. Of these species, 45 are listed as threatened under the Threatened Species Conservation Act. In North East NSW, hollow-dependent species are already in very low numbers or absent from the harvest area in the regrowth forests. Implementing a more intensive logging regime will mean that these species will be increasingly dependent on protected areas.

About one third of the area of State Forests in Upper and Lower North East is already zoned for protection. However, this area is heavily biased in composition (it is made up of non-commercial vegetation communities, rainforest, old growth forest, etc) and distribution (more in the Non-regrowth Zone, i.e. escarpment areas). The EPA and Forestry Corporation have proposed to increase this protected area slightly by ensuring that at least 20% of the net harvest area is protected at every local scale. This results in a patchwork of areas that have not been properly assessed for their ability to sustain viable populations of threatened fauna or provide connectivity. There has been no systematic assessment at a regional or sub-regional scale.

This document also reports the EPA representative Brian Tolhurst as stating (page 26/60)

All trees greater than or equal to 100 cm dbh should be retained and protected as a matter of urgency. Not only do these provide the best opportunity to develop the large hollows required by many species they also provide more flowers, fruit, nectar and seed along with nesting



opportunities for large birds such as raptors. At this stage of the harvesting cycles across coastal NSW all remaining large trees are part of a limited resource and are critical for many threatened species and populations to survive. There is known clear deficit of hollow bearing trees in the forested coastal landscapes of NSW.”

Dear EPA, The solution to the apparent difficulty over the past 20 years in regulating habitat tree retention is not actually resolved by removing the requirement, the outcome does not change. This difficulty is also not resolved by engaging a third party with vested interests for an alleged objective perspective. The NRC is not independent.

The solution to the difficulty of trying to regulate Forestry Corporation in order to constrain the negative impact on biodiversity of intense forestry operations is to confine their domain to plantations. What would EPA need to be able to come out in support of the ending of the logging of public native forests? To protect all the environmental values?

The draft IFOA does not recognise climate change impacts. It is important for me that this is considered by rigorous independent scientific advice. I believe that it would provide the substantive basis for the reconfiguration of management of our public forests in the public interest, from many perspectives.

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?

N/A. This document presents a lose lose scenario. The environmental impact would be monumental and “sustainable timber” from the NENSW forests is not ecologically possible with the government objective of sustained timber commitments

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?

N/A

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)? N/A

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

6. General comments

The Great Koala National Park should be established as a matter of priority.

The Comprehensive, Adequate and Representative Reserve System attempts to protect sufficient habitat for the conservation of the unique biodiversity of this continent; ... for example, that there is enough appropriate habitat protected for enough breeding females to provide for the continuation of the species. In NENSW, the expert panels determinations of “enough” was



expressed in targets of hectares of species specific habitats. The extent to which targets were met is a yardstick for how vulnerable the species are to regional extinction. The analysis of this in NENSW is reported in "The Good, the Bad and the Ugly: science, process and politics in forestry reform and the implications for conservation of forest fauna in north-east NSW" by C Flint, D Pugh and D Beaver, 222-255, (editor Dan Lunney) Conservation of Australia's Forest Fauna (second edition) 2004. The situation has only gotten worse. It has not been ESFM of our public forests over the past 20 years.

The areas of oldgrowth forest and rainforest currently protected under the Informal Reserve areas of Forest Management Zoning in our public forests are vitally important. Regardless of any change to the definitions, these areas have not been intensively logged over the past 20 years. The long term habitat values that they afford are far greater than any possible short term wood value. These areas contribute to the CAR reserve system, not just because they are defined as oldgrowth or rainforest. Any remapping to log protected areas is and will be vigorously opposed.

The proposed reduction of protection zones for headwater streams is also totally opposed. There is no expert support for this whatsoever reported in The Remake of the Coastal Integrated Forestry Operations Approvals Final Report Threatened Species Expert Panel Review, on the contrary.

For example Brad Law, DPI Forestry, stated: "In some areas where areas once mapped as riparian buffers are no longer identified then there would be a loss of habitat protected for the past 20 year period. Given the intensity of operations over the last 10 years, it would be important to try to ensure these areas remain protected"

The EPA representative Brian Tolhurst stated: "No further loss or impact on the retained riparian areas that have been protected to date under the existing rule set should occur. The expert panel agreed that these areas were the few areas seen on the site visit that still retained habitat elements and the diversity, form and structure of a forest"

7. Harvesting Conditions

Silviculture Type		Harvesting Objectives and Condition for each stand condition
Regeneration STS		<p>Both compartments 26 and 27 have had a long history of harvesting resulting in stands of mixed aged currently.</p> <p>Compartment 26 was last harvested in 2001 under an opportunistic STS silviculture regime. Areas to the north of the compartment were pre-merchantable and not harvested at that time.</p> <p>Compartment 27 was last harvested in 2006 under a mix of STS and AGS silviculture and some areas to the north were not harvested at that time.</p> <p>The NHA has off-set areas identified to assist with the management of basal area removal constraints. These areas are considered pre-merchantable and will not be logged in this event. The remaining area is the treatment area and it has been divided into two areas, an area that will be cut in 2016 and / or 2017 and an area that is better scheduled for harvesting at the same time as adjacent hardwood plantations are cut. The timing of the plantation harvest was not known at the time of planning this event.</p> <p>Both compartments have a high presence of Sydney Blue Gum dominated stands. The NHA comprises 89% SBG dominated forest types which is fairly evenly distributed between the treatment area and the off-set area (49% and 40% respectively).</p> <p>Commercial stems are scattered throughout the compartments which are to be cut selectively. In stands dominated by commercial endpoint Sydney Blue Gum, the objective is to implement a regeneration harvesting treatment to establish a new, vigorous Sydney Blue Gum stand.</p> <p>Crew to retain well-formed seed trees of preferred species at ~40 m spacing.</p> <p>HC to instruct crew to retain patches of quality advanced regeneration where they occur.</p> <p>Crew to remove all merchantable stems not marked for retention and ensure mechanical disturbance creates a suitable seed bed for regeneration.</p>
Off-Set Area		As mapped. Harvesting will not occur in this area during this event.
Monitoring		<p>Planning assumptions have been made as below, and therefore the HC must conduct Basal Area monitoring in areas treated with Regeneration STS.</p> <p>HC is to monitor BA retention during harvesting using a minimum of 30 BA post-harvest sweeps, randomly located across different stand types to ensure average BA is maintained.</p>

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