



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

Last Name*: [REDACTED]

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:

NA

Organisation name:

NA

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

Email as above please

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**

Have you previously engaged with the EPA on forestry issues?

No

Make a submission – Form

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

Maintenance of long term biodiversity

Multiple use of public forests for job creating nature based tourism and recreation.

Long term sustainable timber production of mixed eucalypt species

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?

More accurate mapping of old growth forest, rainforest and important habitat features such as very old large trees and large hollow trees are potential benefits as it would provide more accurate baseline data to help protect rare and vulnerable fauna. However if this mapping is used only to justify the meeting of wood supply shortfalls then this is a very negative outcome.

Hollow bearing trees are essential habitat features, as the expert panel repeatedly stressed, and these will be prioritised for retention in clumps which is positive. However if long term sustainability is the aim then the next generation of recruitment trees need to be protected so that at a latter time they in turn can fulfill the role of the large hollow trees. This is important as these trees not only provide the essential homes for gliders phascogales quolls etc but they provide nest sites for large raptors, owls and cockatoos.

The very large increase in logging intensity proposed under the coastal IFOA might provide a short term boost to timber supply but the degradation of the forests to a more even stand, drier Blackbutt forest is deplorable as it fundamentally changes the forest species composition and structure which supports the unique range of timber species found in the NE coastal forests



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?

The Coastal IFOA will have a very bad negative outcome on the management of environmental values for these reasons.

The proposed changes involve large areas up to 45 ha.

There is a very short return time to harvest adjacent coupes

The very low basal area retention results in the retention of small spread out trees which form a much degraded flora and fauna habitat.

The 20% landscape protection threshold sounds good but it is apparently the status quo according to the expert panel and in addition I am concerned that the new logging will target the biggest and best trees in the more fertile moist riparian zones and the 20% apparently protected is poor quality previously logged degraded areas of forest.

The expert panel stressed the need for long term monitoring. This hasn't been done in the past –at least I can't find a comprehensive peer reviewed literature with the methodology and results of FCNSW monitoring.

Clumping of retained forest is problematic as its effectiveness depends on the spatial arrangement, connectivity and quality of habitat. The IFOA is silent as far as I can see on these points

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)?

Multi scale protection only works when different aged forests are connected up to enable species persistence and re-colonisation of harvested areas. In my experience there is a lot of very degraded forest within the intensive zone already, and I query whether this approach will work if the proposed large scale changes go ahead.



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

I don't think this draft coastal IFOA will meet the twin needs of effective environmental management and a sustainable timber industry. The NRC has at one stage said "it is not possible to meet the Governments commitments around both environmental values and wood supply" Apparently if the forests are remapped then there is sufficient supply. It looks like the Government wants to prioritise extraction over environmental protection. IF NSW already gets the vast majority of its timber from plantations then this is what should increase in the future with the development of plantations on already cleared land.

6. General comments

Thankyou for the opportunity to comment