

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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

Last Name*: Tarrant

Phone:

Mobile*: [REDACTED]

Email*: [REDACTED]

Postcode*: [REDACTED]

Country*: Australia

Stakeholder type (circle)*: Individual

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

Other, please specify:

Organisation name:

What is your preferred contact method (circle): Mobile, Email or phone? e-mail 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

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?**

The entire draft document is important as I value biodiversity as well as protecting water catchments from further damage. Healthy native forests are the only hope for native species survival as well as catchment rehabilitation. I come from a farming background and I enjoy to live in a productive landscape as well as take leisure in National Parks and State Forests. I feel that the draft Coastal IFOAs' erosion of environmental protections threatens farming, through loss of water quality and lowered rainfall and State forests through habitat destruction and loss of biodiversity.

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?**

No parts have a positive outcome. The reality is, the draft Coastal IFOA will have a devastating impact on both the sustainability of the timber industry and the environment. The draft Coastal IFOA provides for the mapping of streams and threatened species etc. which

would seem on the face of it to be a valuable contribution to environmental values. I assumed that the purpose of undertaking such mapping would be to ensure that streams and threatened species would be protected from timber harvesting. But I am alarmed to note the statements in the executive summary of the IFOA, which make it clear that timber harvesting will be prioritised over any environmental concerns and “to ensure this increased protection does not impact on the... supply of timber”... buffer zones around most streams will be reduced from 10m to 5m. In spite of any mapping of streams, and in spite of numerous submissions to the RFA review process that the buffer zone should be increased to at least 30m because 10m does not adequately protect riparian areas, yet, unbelievably, you are reducing them. The justification for this reduction appears to be that there was a lack of compliance with the current requirements, so rather than investing in proper independent monitoring and enforcement, The Government is electing to reduce regulations to self-monitored ‘Guidelines’ and erode or eliminate existing environmental protection restrictions so that it is easier for the timber industry to comply, simply because there is less to comply with. This is unacceptable. As for the mapping, it is unclear to me what the Government proposes to protect streams and threatened species from, if not from logging. I am left with the conclusion that the statements regarding environmental protections are merely designed to mislead the public and prevent people from investigating the details of the draft Coastal IFOA. Similarly, the draft Coastal IFOA proposes to increase penalties for contraventions of the regulations, which on the face of it this would seem to be a welcome strengthening of environmental protections. However, given the changes to the environmental protections as set out in detail below, enforcement is in fact seriously weakened since significant environmental damage can and will occur without it amounting to a contravention of the IFOA. Thus the draft Coastal IFOA will have no positive outcomes on the management of environmental values or the production of sustainable timber. Despite numerous statements throughout the document, the website and media releases, referring to new ‘protections’ and ‘limits’, most of the actual protections for sustainability and threatened species have been stripped out of the new IFOA framework. Forestry practices under the existing RFAs have already proven to be environmentally unsustainable. The 50% reduction in the North Coast koala population in the past 20 years is stark evidence of this. If the industry is not environmentally sustainable then is it economically sustainable in the long term either. The remaining native forests cannot withstand a further 20 years of logging under current practices, let alone those proposed under the draft Coastal IFOA. The only way to sustainably produce timber is to move away from the dependence on native forests, whether on public or private land, and to transform the industry to being 100% plantation-based. This must not be achieved by replacing existing native forests with Blackbutt plantations. This will require planning, demand management whilst plantation supply is developed, and investigation into alternate building products such as hemp and bamboo. This is where the energy of the Government and taxpayers’ funds should be applied, if it is serious about the future of the timber industry. Not to propping up an unsustainable industry. Our native forests and wildlife are already on the brink of extinction. Once biodiversity is lost it is gone forever. It is irresponsible of Government to treat native forests purely as a resource to exploit in the short term without acknowledging their larger purpose in our environment and our lives and ensuring their protection and restoration. The expiration of the RFAs is an opportunity for the Government to show real leadership and innovate the industry, but instead you are choosing to sell out our forests, our koalas and our wildlife, which you have no right to do, and I am truly appalled.

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 entire draft Coastal IFOA will have negative outcomes on both. The most alarming aspect of the draft Coastal IFOA, which I most emphatically oppose, is the removal of the need to survey

for and protect threatened plant and animal species. The survey requirements have been removed for 22 threatened animals (nine mammals, six birds, six frogs and one reptile), with prescriptions only retained for 14 species. Plus 228 threatened plant species (72 per cent) will lose all protection and 28 species (nine per cent) will have reduced protection. Of the 91 species currently requiring 50m buffers around them (i.e. 0.79ha), 79 will have all protection removed and the rest will have buffers reduced to 20m (i.e. 0.13ha). This is not the time to be reducing protections for threatened species. We are facing the sixth global extinction event in the history of the planet and protections must be urgently increased. Any actions which reduce the protections for threatened species are reckless and irresponsible. The draft Coastal IFOA seeks to repeal the provisions that make forestry agreements prerequisites for logging activities. This is unacceptable. This has the potential to open up significantly larger areas to logging. Given that Regional Forest Agreements were originally made on the basis of significant mapping efforts of old growth and significant forests, to ensure these were not open to logging, the purpose of the proposed changes is clearly to reduce environmental protections and create access to areas that were previously excluded from logging, also rendering it far easier for the industry to 'comply'. The draft IFOA proposes to consolidate the currently separate licenses related to harming animals, plants, and fish or for polluting waters, replacing them with a single environmental licence will to be issued to loggers. I am concerned that this will reduce the specific protections required for different ecosystems and species and result in less protections overall.

Increased logging intensity: the draft Coastal IFOA proposes 4 different types of logging: selective, intensive, mixed intensity and alternate coupe. Yet, even for the least intensive kind of logging, 'selective logging', the IFOA only requires 10 square meters of trees be retained per hectare logged, and effectively that only 0.1% of the total area will be an actual tree. The stated intent is to maximise the inclusion of these retained trees within the 10 per cent of the loggable area that will be set aside as 'wildlife clumps'. These wildlife clumps are discussed below and will in no way compensate for the increased overall intensity. For the remaining 90 per cent of the loggable area there will be no minimum tree retention requirements, so if the tree retention requirements have been met in these clumps, then clear felling of sections of forest of up patches up to 45ha in area will be allowable. There is no possible way that this can be considered environmentally responsible and is in effect providing for at least a doubling of logging intensity and is clear felling in all but name.

Wildlife clumps: the draft Coastal IFOA states that 'wildlife clumps' will be retained to protect threatened species. This appears to be a mere public marketing exercise to distract from the actual detail given that coupes for clear felling are proposed to be 50 to 80 ha under the draft Coastal IFOA, when the current legal limit for clear felling in northern NSW is 0.25 ha. In practice, this means that animals and plants will be marooned in small clumps of habitat as the rest of the forest is felled around them. There is no requirement that such 'clumps' be linked to one another or to any other habitat via corridors, for example. As you well know and as all the science clearly indicates, wildlife cannot exist in isolated clumps or in small reserves and this approach will only contribute to further species extinction, rather than species preservation. Further, given the removal of threatened or specific species protections already discussed above, there is no guarantee that any so-called 'wildlife clumps' will be occupied habitat and the whole framework will leaves it to the timber industry to subjectively select such 'wildlife clumps', with nothing to guarantee such decisions will not be made for convenience, accessibility issues or a lack of suitable trees for harvest, rather than their suitability for wildlife habitat. There are over 1000 threatened plants and animals in NSW. It is unbelievable to me that you are prepared to deliberately push them further towards extinction. There is no possible way that this can be considered to be environmentally sustainable or responsible.

Habitat hollows: the draft Coastal IFOA provides that only 5 hollow bearing trees have to be retained per hectare. These important habitat features will be essentially useless if all the trees around them are felled. There is already a significant shortage of hollow bearing trees in our native forests and it takes many years for such hollows to form. The shortage of hollows is already resulting in issues with wildlife such as possums, gliders and bats being forced to find homes inside buildings, and has prompted all wildlife groups in the area to call for people to install man-made hollow habitat wherever they can. ALL hollow bearing trees should be preserved if our wildlife species are to survive.

Koalas: the draft Coastal IFOA removes the current requirements to check for koalas before commencing logging operations, apparently on the basis that they have already been 'mapped' by the Government so we know where they all are. This is ludicrous in the extreme, given that colonies can be forced to move around; e.g. when leaf mass is negatively impacted by long hot dry periods resulting in eucalyptus leaf shedding, or fire events. The largest

remaining koala population in NSW is in the Coffs Harbour region, hence the calls to set aside a large koalas reserve area in the region, yet the Government chooses to ignore the research and the evidence, and allocate land for koalas, only 2% of which has been mapped as being suitable koala habitat, and some of which, such as Mt Lindsay, consists of clearly uninhabitable degraded forest where the trees are suffering major dieback as a result of unsustainable logging activities leading to the invasion of Bell Miners. Again, it is hard to understand why the Government is choosing to spend money on a plan which is not evidence-based and I fear it is also a mere exercise in distraction so that the public is lulled into the belief that the Government cares about the future of our koalas. If the Government truly cared about our koalas it would not be proposing to remove the existing protections, under the draft Coastal IFOA.

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)?

Is the Government obfuscating to convince the public that it is improving environmental protections? In fact the effect is to significantly erode most of the current ones or remove them altogether. The impact of the draft coastal IFOA will be to destroy our environment, our remaining koala populations and threatened species by opening up new areas for logging, significantly increasing logging intensity, and preventing Government from having to do the real and the difficult work of transitioning the forest industry from unsustainable native forest harvesting to a sustainable plantation forest industry. Apparently the Government is beholden to the interests of only a few and is willing to run roughshod over the people of NSW and our sustainable future. There are only around 600 jobs in the public native forest timber industry, and even these are increasingly being replaced by mechanisation. Our forests are worth far more as carbon sinks, tourism and recreational facilities, to support water catchments and also have high scientific and medicinal value. But only if they are left standing. There is very little healthy native forest left. The survival of all our threatened plant and animal species are absolutely dependent on the protection of whatever remains. I am outraged that the Government will place our remaining native forests and the threatened species within them in such peril, and use my taxes to do so. Not to mention placing our rainfall and water supply at risk.

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

No, this document will not be effective in achieving either aim.

Environmental values will be damaged to the point of collapse and require time consuming and broad scale rehabilitation. A sustainable forestry industry would involve transitioning out of Native Forests very quickly and require knowledge, experience and accountability in growing appropriate tree species in plantations.

6. General comments

I strongly oppose the draft Coastal IFOA. I call for a Moratorium on the logging of all remaining native forests to allow for a proper review of the effectiveness of the RFAs over the past 20 years in protecting the forests and the threatened and other native species that live in them. I also call for the development of plan to urgently transition the timber industry reliance upon native

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