



Respondent No: 503

Login: Anonymous

Email: n/a

Responded At: Jul 11, 2018 17:10:13 pm

Last Seen: Jul 11, 2018 17:10:13 pm

IP Address: n/a

- Q1. **First name** Barry
-
- Q2. **Last name** Tomkinson
-
- Q3. **Phone** not answered
-
- Q4. **Mobile** [REDACTED]
- Q5. **Email** [REDACTED]
- Q6. **Postcode** [REDACTED]
- Q7. **Country** Australia
- Q8. **Stakeholder type** Community group
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** National Parks Association Milton Electorate
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** Yes
- Q14. **Can the EPA make your submission public?** Yes
- Q15. **Have you previously engaged with the EPA on forestry issues?** No
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**
Please refer to the attached letter
- Q17. **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?**
Please refer to the attached letter

Q18. 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?

Please refer to the attached letter

Q19. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?

Please refer to the attached letter

Q20. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?

Please refer to the attached letter

Q21. General comments

Please refer to the attached letter

Q22. Attach your supporting documents (Document 1)

[Redacted]

Q23. Attach your supporting documents (Document 2)

not answered

Q24. Attach your supporting documents (Document 3)

not answered

XX Month Year



Milton Branch
PO Box 176
Ulladulla NSW 2539
milton@npansw.org.au

NSW Government
Department of Planning and Environment

Uploaded to <https://engage.environment.nsw.gov.au/forests>

Dear Sir/ Madam

Submission on NSW Draft Coastal Integrated Forestry Operations Approval (IFOA)

The Milton Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to comment on the Draft Coastal Integrated Forestry Operations Approval (IFOA)

Introduction

The National Parks Association (NPA) Milton Electorate is a non-government, non-political community-based organisation of 160 members and families in the Milton-Ulladulla area of the Shoalhaven. It is concerned with the preservation and protection of our natural environment and its enjoyment by future generations. As an organisation, the NPA tries to present a balanced and fact based commentary on key matters of interest to us and our community

Background

Milton NPA is located on the South Coast of New South Wales in an area with a long history of forest logging, which continues to this day. We have, as members, families who have in past years worked in the industry and we all know friends in the community who have long standing forestry connections.

Summary

We do not have a myopic view that all forest logging is bad, nor do we believe that all those who oppose it are ignorant idealists. On the IFOA website, the stated aims are admirable (“... *provide clarity, transparency and enforceability as well as better balancing environmental outcomes and timber production*”). Unfortunately for the NSW South Coast region, the implemented results will have many more adverse than positive impacts. Logging has been a declining industry in New South Wales for many years and this decline will continue. The South Coast is a now region where our future economic and jobs growth is inextricable tied to new business models, especially the potential for an international nature based tourism industry. The IFOA proposals as they currently stand pose a very real threat to that eco-tourism growth industry.

head office: PO Box 528 Pyrmont NSW 2009 **visit us at:** Suite 1.07, 55 Miller Street, Pyrmont
tel: 02 9299 0000 **email:** npansw@npansw.org.au **web:** www.npansw.org
abn: 67 694 961 955 **donations** are tax-deductible and gratefully received



Key Issues

1. The Governments own Natural Resources Commission (NRC) Report identifies that the IFOA proposals are not able to satisfy the Governments twin criteria of protecting environmental values as well as wood supply targets (Quote: “ *..it is not possible to meet Governments commitments around both environmental values and wood supply*”)
 - 1.1. Clearly, they are designed to fulfill the short-term goal of meeting wood supply, consequentially devaluing the environmental protection goal. In economic terms, this is a well-worn and well known downhill road to longer term problems for the natural environment.
2. The NRC further identifies that the proposed increase in logging intensity will occur at the expense of the environment. (Quote: “ *. the intensive harvesting zones are being formally introduced to prop up an unsustainable wood supply arrangement at the expense of the environment*”)
 - 2.1. For us in the South Coast region, this is analogous to our local farmers feeding their cattle, this year, most of their next year’s grain supply. Over time it creates increasing problems as they in effect consume their own potential capital for future growth.
 - 2.2. This is precisely the problem with the IFOA proposals. They will increase logging in our area by at least 50% over current levels, levels which we already know are too high and are already causing damage to our natural areas. The ongoing damage will not only cause irreparable harm to these pristine areas but also, consequentially, to our emerging eco-tourism market. No one wants to travel a long distance to simply see intensively logged forestry.
3. The NRC sums up the inescapable impact of the proposals as follows: “ *...it must be clearly understood that these proposed intensive harvesting practices are effectively clear felling diverse native forest to replace with even age native plantations in a deliberate manner*”.
 - 3.1. The longer term impact of the IFOA proposals will be to convert most remaining iconic native forest into what are effectively managed plantations. These sorts of areas have little or no appeal to the local, national and international eco-tourism and walking market place. The iconic native forest are the key to unlocking such markets, which is precisely the reason why areas such as Tasmania and New Zealand have been so successful in this field.

Comments

These IFOA proposals are bad, both environmentally and commercially.

1. Economically, both the NRC and many ecologists seem to have reached consensus on the impacts which the IFOA proposals will have. The proposal will result in the slow but certain collapse of our native natural forest systems and many of the species of iconic native animals which depend upon those systems.
 - 1.1.1. As a society, we will be in the unique position of being able to monitor the extinction of many species, knowing full well that that it did not need to occur.
- 1.2. Commercially, the long term negative economic consequences will far outweigh the short term ability to meet wood supply targets, which could easily be sourced elsewhere from plantation grown timber.
 - 1.2.1. The NSW State Government has this month outlined plans to spend \$50 million on building new walking tracks in natural areas, including in the South Coast. These investments are an attempt to capture some of the booming international walking and eco-tourism market. The impact of the IFOA proposals will be to

dramatically undermine this potential new market, which depends largely for its success on the social media network of referrals between existing participants.

- 1.2.2.** Recent NSW Government announcements regarding land clearing and feral wild stock horse protection in some National Parks have already quickly spread across these communities and networks. The IFOA proposals will serve to further undermine the NSW position.

Recommendations

- 1. Prioritise long term environmental protection over short term commercial considerations:**
 - a. To ensure the survival of our threatened species and the survival of an intact forest ecosystem along the South Coast, the environmental protection needs to be given precedence over the harvesting of wood.
- 2. Decision making must be based on scientific analysis:**
 - a. Independent scientific evidence on how to maintain a forest ecosystem that supports the biodiversity of fauna and flora long term has to inform any decisions made on where to log, what to log, how much to log and the frequency of harvesting.
- 3. Protect future jobs and growth via by eco-tourism, not logging:**
 - a. The potential of ecotourism needs to be fully realized and underpinned by a lead agency so a transition from harvesting wood/ logging forests to using intact forests to generate income and provide employment is optimized and accelerated. Over 23,000 people have walked the Three Capes Track since it opened in December 2015
- 4. Protect the South Coast environmental infrastructure from degradation:**
 - a. Eco tourism relies on the integrity of the forests and the natural environment where the track goes through, but also on forests covering areas where the 'eyes roam'. That is our unique selling point at the NSW South Coast, the feel of ancientness and timelessness combined with relative easy access. Once destroyed, it can't be brought back. While wood itself is a regeneratable resource, the mature forest and the species relying on it are not.
- 5. The IFOA proposals should not go ahead:**
 - a. The Coastal Integrated Forestry Operations Approval should not be endorsed as it currently stands but should be re-worked and should be in line with the above recommendations.

For further enquiries on this matter please contact Brigitte Nairn at: milton@npansw.org.au

Yours faithfully

Barry Tomkinson

**Convenor, Milton Branch
National Parks Association of NSW**

References

Natural Resource Commission (2016 and 2018) *Advice on Coastal Integrated Forestry Operations*, November 2016 and *Supplementary advice on Coastal IOFA remake*, March 2018.

<http://www.nrc.nsw.gov.au>

Tourism Tasmania (2018) *Stage Three of Three Capes Track complete*. 25 January 2018.

<https://www.tourismtasmania.com.au/news/category/tasmanian-government/stage-3-of-the-three-capes-track-complete>