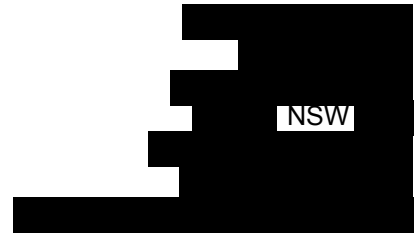




North Coast Environment Council Inc.



North Coast Environment Council (NCEC)

Coastal IFOA Submission

Introduction

The North Coast Environment Council (NCEC) represents more than fifty groups and individuals across an area stretching from the Hunter River to the Queensland Border and west to the New England Highway. This area includes the most biologically diverse region of NSW. Our members have campaigned for more than forty years to support the protection of the biodiversity across our region.

The complexities of the RFAs and IFOAs have always interested scientists and members of the community that care about our natural environment. NEFA, one of our member groups is particularly fascinated by the processes undertaken by the NSW State Government to implement and manage these aspects for our forested lands and undertake audits with ecologists and members of the NCEC. The North East Forest Alliance is a member of the NCEC and the most active in following the management of our public native forests by Forestry Corporation of NSW. We support their recommendations regarding the draft coastal IFOA Submissions below.

1. Recognise that the Regional Forest Agreements have failed to deliver environmental protection or industry security.
2. Recognise that the benefits of non-timber forest values are vital for the future of regional economies and ecosystems.
3. Establish the Great Koala National Park as an immediate priority.
4. Commit to a just transition out of native forest logging on public land and the transfer of public forests to protected areas when the RFAs expire.
5. Ensure that public forests are managed for the public good (ie: tourism, environmental repair, carbon sequestration and storage, wildlife habitat and provision of clean, abundant water)
6. Stop planning to log areas protected as habitat for threatened species, Koalas, oldgrowth forest, rainforest and stream buffers.
7. Stop increasing logging intensity and legalising clearfell logging along the North Coast of NSW.
8. Stop propping up the rapacious native forest logging industry at the cost of species extinction, logging dieback, reduced stream flows and water quality decline and sustainable forest based jobs.
9. End the logging of public native forest and complete the transition of the timber industry to 100% plantations.
10. Transfer all existing subsidies from native forest logging into native forest restoration.

Dailan Pugh OAM response to claims made by the EPA regarding the IFOA.

Mr Pugh takes issue with the answers from the EPA to assertions from NCEC member the Nambucca Valley Conservation Association.

1) Why have buffers in head-water streams been reduced from 10 metres to five metres?

The current Integrated Forestry Operations Approvals (IFOA) relies on very old and out of date mapping of streams. Many headwater streams are not mapped, or they are mapped in the wrong place, and in many instances this means they have no buffer.

The new stream mapping is highly accurate, and ensures a consistent 5m buffer is applied to all headwater streams, except in modelled threatened fish habitat, and in areas subject to intensive harvesting and in the Eden sub-region, where more protections are applied.

This ensures that areas of greater risk, being those subject to more intensive harvesting or where there is threatened fish habitat, have greater protection. More information can be found on the landscape factsheet, and on pages 41-43 of the online presentation

2) Why have specifications for threatened species protections been removed?

Protections have not been removed; changes have been made to try to ensure a more effective and efficient approach. More information can be found on the wildlife protection factsheet, online presentation, and multi-scale landscape protections factsheet.

3) Why has the need to look for and protect koalas prior to logging been removed?

The new approach is informed by the latest science and up-to-date mapping of the distribution of koalas and their habitat. The existing koala provisions were not working, including difficulties with enforcement.

Further information can be found in the koala case study

4) Why is there a need to establish a 140,000 ha intensive clearfell area between Grafton and Taree?

The new IFOA proposes an intensive harvesting zone in 140,000 ha of state forest between Taree and Grafton. The new IFOA places significant controls on intensive harvesting.

It is important to recognise that wildlife and tree protection clumps, and habitat trees and seed trees will still be protected in intensive harvesting – it is not clearfelling.

More information on the history of intensive harvesting can be found in the Natural Resources Commission (NRC) reports, and also the timber harvesting factsheet.

In answer to the question about why the overall amount of timber taken from public native forests is to be increased by 59,300 cubic metres, the spokeswoman said that wood supply decisions were not part of the IFOA.

And on the matter of 2014 NSW Government promises not to increase supply quotas or erode environmental values, she referred readers to the NRC reports, 'which set out how this is achieved'.

Dailan Pugh OAM response to EPA's response.

1) Why have buffers in head-water streams been reduced from 10 metres to five metres?

Currently all mapped, and the vast majority of "unmapped", headwater (ie catchments < 20ha) streams in north-east NSW require 10 metre buffers.

The proposal to reduce the current requirement to apply 10m buffers to all headwater streams within 100km upstream of the Department of Primary Industry (DPI) mapped distributions of a threatened fish is a huge reduction. The plan is to only retain 10m buffers on all headwater streams within the North Coast Intensive Zone. All other headwater streams are intended to have buffers reduced to 5m.

My assessment of the Clarence and Richmond catchments is this will represent around a 35 per cent reduction of existing riparian buffers (outside 'informal reserves'), a 24 per cent reduction due to changes in stream buffers and an additional 11 per cent reduction due to the loss of protections around records of threatened fauna.

The scientific evidence is that we should be increasing buffers on headwater streams to 30m, not reducing most of them to 5m.

2) Why have specifications for threatened species protections been removed?

For north-east NSW the intent is to remove the need to survey for and protect 22 threatened animals (nine mammals, six birds, six frogs and one reptile), with prescriptions only retained for 14 species. A total of 60 threatened plants will still require limited surveys and limited protection ranging from Roadside Management Plans up to 20m exclusions.

Overall 228 threatened plant species (72 per cent) will lose all protection and 28 species (nine per cent) will have reduced protection.

Dailan Pugh (NEFA)

Of the 91 species currently requiring 50m buffers around them (ie 0.79ha), 79 will have all protection removed and the rest will have buffers reduced to 20m (i.e. 0.13ha).

The agencies intend to set aside "wildlife clumps" as an alternative, though these will not be based on surveys or records, rather they will just be subjectively chosen by the Forestry Corporation and thus will not necessarily protect any threatened species.

3) Why has the need to look for and protect koalas prior to logging been removed?

Since 1997 the Forestry Corporation have been required to thoroughly search for Koala scats ahead of logging and establish exclusion zones around Koala High Use Areas.

NEFA caught them out in 2012 for refusing to do the searches with the thoroughness required, so rather than requiring independent searches the EPA and Forestry Corporation agreed to use modelling.

In 2016 the EPA convened an expert panel to review various approaches, coupled with extensive groundwork, to identify potential Koala habitat.

The project found that neither modelling nor detailed mapping were accurate enough to identifying the "occurrence of feed trees and therefore habitat class at the level of detail required for management in state forests".

The panel unanimously agreed "the primary intent and focus should be to identify the location, distribution and extent of areas that are supporting extant/resident koala populations".

Undaunted the EPA were determined to get rid of surveys so they had DPI-forestry prepare a model that they are now using for regulation - requiring increased tree retention in virtual habitat rather than exclusion of logging from occupied habitat.

4) Why is there a need to establish a 140,000 ha intensive clearfell area between Grafton and Taree?

Within the loggable area of the 140,000ha North Coast Intensive Logging Zone the requirement will be to retain up to five hollow-bearing trees per hectare, and in modelled Koala habitat up to five – 10 Koala feed trees per hectare (where they still survive).

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 and habitat clumps.

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 the clumps (which is likely) then they will be able to clearfell patches up to 45ha in extent.

The reason it is being done is to increase short-term yields and to convert native forests into what the EPA call "quasi-plantations".

5) Why has the overall amount of timber to be taken from public native forests been increased by 59,300 cubic metres?

The EPA asserts that the IFOA does not change future wood supplies. Mr Pugh however refutes this: The NSW Government repeatedly promised the new IFOA would result in "no net change to wood supply and no erosion of environmental values".

According to the available data, for north-east NSW currently 177,700 m³ per annum of large and small high quality saw logs from native forests and hardwood plantations is committed to sawmillers in Wood Supply Agreements. This is the current wood supply.

The Natural Resources Commission's (NRCs) assessment of available timber yields was that even with the increased logging intensity, reduction of stream buffers, and removal of protections for threatened species that "it is not possible to meet the Government's commitments around both environmental values and wood supply".

They identified there would still be a shortfall of 7,600 to 8,600 cubic metres of high quality saw logs per annum due to protections for Endangered Ecological Communities and Koalas, which they are now proposing to make up for by logging protected old growth forest and rainforest.

Nowhere in their documents do the NRC say what timber volumes they base these conclusions on. When I asked, I was told that their considerations have been based on high quality saw log volumes from north-east NSW's native forests and hardwood plantations of 237,000m³ per annum.

This is an increase of 59,300m³ above current wood supply commitments.

6) Is it true that contracts for native timber supplies have already been signed - for example with Boral through until 2028?

The current Wood Supply Agreements (WSA) have been issued until 2023.

In 2014 the NSW Government spent \$8.55 million to buy back 50,000 m³ per annum of high quality saw logs from Boral "to reduce the harvest of high-quality saw logs on the North Coast to ensure the long-term sustainable supply of timber from the region's forests".

Their WSA was extended until 2028, effectively increasing the total volume committed to Boral. Now the timber theoretically bought back, and more, appears to have been re-allocated to the industry for free according to the NRC figures.

The Forestry Corporation have also issued an Expression of Interest for new WSAs for 416,851 tonnes per annum of low quality sawlogs and residual logs (ie logs at least 10cm in diameter and 2.4m long) from north east NSW's native forests and plantations (58 per cent) of the total log resources predicted to be produced), which the EOI states they intend to issue in June 2018.

These volumes assume that the new logging rules have been approved.

The North East Forest Alliance and NCEC member groups conduct regular audits of forestry operations and the findings support Justice Peppers findings on Forestry Corporation of NSW. Findings in the NSW Land and Environment Court by Justice Pepper pinpoints the main reason why The NCEC and our member groups strongly oppose the rollover of the RFA's and changes to the IFOAs.

Justice R. A. Pepper of the NSW Land and Environment Court (8 June 2011)

"[I]n my view, the number of convictions suggests either a pattern of continuing disobedience in respect of environmental laws generally or, at the very least, a cavalier attitude to compliance with such laws."

Here is one example of an Audit findings done by the North East Forest Alliance (NEFA) that support Justice Peppers determination of Forestry Corporation of NSW.

A comprehensive list of audits with background papers can be found here:

<https://www.nefa.org.au/audits>

Cherry Tree State Forest

One of the worst breaches by Forestry Corporation of NSW and lack of action by the EPA to address these breaches.

Full audit report can be found:

https://d3n8a8pro7vhm.cloudfront.net/ncec/pages/111/attachments/original/1505203765/Trashing_Endangered_Ecological_Communities_in_Cherry_Tree_SF_small.pdf?1505203765



ABSTRACT In 2015 the Forestry Corporation roaded and logged two Endangered Ecological Communities (EECs) in Cherry Tree State Forest, while the Environment Protection Authority (EPA) audited their operations in response to NEFA's complaints to the Minister for the Environment. At the time neither agency acknowledged that any EECs were affected, as they continued to be roaded and logged. At the same time both agencies were undertaking mapping of 13 Endangered Ecological Communities, ultimately identifying 116ha of Lowland Rainforest and 142ha of Grey Box-Grey Gum Wet Sclerophyll Forest within the compartments being logged. The logging was completed in September 2015 and the mapping of EECs completed in June 2016. They mapped it as they logged it. NEFA's final audit report was provided to the Minister in November 2015 and it took the EPA over a year to respond in December 2016. They confirmed 66 breaches of logging prescriptions (one involving hundreds of individual breaches) though only cautioned the Forestry Corporation. The EPA deferred any consideration of the EEC Lowland Rainforest, and did not acknowledge that the EEC Grey Box-Grey Gum Wet Sclerophyll Forest exists, despite the fact that many of the individual

breaches identified by NEFA occurred within it, and were thus breaches of the NPW Act rather than the Threatened Species Licence. This review of the EPA's released EEC mapping and landsat imagery confirms most of NEFA's complaints regarding roading and logging of Lowland Rainforest, and identifies 33 incursions into mapped Lowland Rainforest affecting 4.5 ha. It also identifies that 50ha of Grey Box-Grey Gum Wet Sclerophyll Forest was heavily logged (>50% canopy removal and bared ground) with up to another 40ha subject to logging operations. To date the EPA have deferred any consideration of the roading and logging of the EEC Lowland Rainforest and NEFA is concerned that the 2 years allowed for them to take regulatory action has expired. NEFA considers that their failure to admit the presence of the EEC Grey Box-Grey Gum Wet Sclerophyll Forest, and failure to take this into account when considering breaches identified by NEFA, is unreasonable. As recognised by the Scientific Committee, loss of hollow-bearing trees, lantana invasion and Bell Miner Associated Dieback are Key Threatening Processes for Grey Box-Grey Gum Wet Sclerophyll Forest. Extensive rehabilitation is a minimum requirement.

NEFA's findings on the EPA action and enforcement of regulations:

The EPA's failure to identify the presence of Grey Box-Grey Gum Wet Sclerophyll Forest, and to take this into account when considering breaches identified by NEFA, is grossly negligent. Most of the specific threatened fauna, habitat tree, snig track and stream breaches we identified occurred within the EEC Grey Box-Grey Gum Wet Sclerophyll Forest and were thus breaches of Section 118A of the National Parks and Wildlife Act. The EPA found that most of our complaints were valid, and identified most as breaches of the Threatened Species Licence, while failing to consider that they occurred in an EEC. As shown by the EPA's (15 January 2016) response to Onion Cedar, the EPA know that an offence that occurs in an EEC is a breach of "section 118(A)(2) of the National Parks and Wildlife Act 1974", so they are fully aware that they have a legal responsibility to account for the fact that most of the breaches identified by NEFA occurred within the EECs mapped by the EPA. As identified in NEFA's audit, the general area has significant problems with lantana invasion of logged forests, resulting in widespread Bell Miner Associated Dieback (BMAD). As identified by the Scientific Committee determination, both of these are Key Threatening Processes affecting the EEC Grey Box-Grey Gum Wet Sclerophyll Forest. It was always our expressed concern that the logging would result in aggravation of both processes. While significant parts of the logging area are already severely degraded through previous logging, the core of the area was still free of BMAD. The logging of the EEC Grey Box-Grey Gum Wet Sclerophyll Forest has been so severe that there can be no doubt that lantana will proliferate and it is therefore likely that BMAD will extend throughout the forest. It will take a massive rehabilitation effort to remove the lantana and stop this occurring. Rehabilitation is essential to restore the health of the Grey Box-Grey Gum Wet Sclerophyll Forest. In justifying their refusal to take any meaningful regulatory action, the EPA (2016) state "FCNSW have made a strong commitment to improve performance as a result of this investigation. ... We have made it explicitly clear to FCNSW that any failure to improve performance will result in alternative, stronger enforcement actions." Did they learn from their mistakes? In October 2016 NEFA assessed logging in compartments 380, 381 and 382 of Sugarloaf State Forest, close to Cherry Tree SF. NEFA (2016) Preliminary Audit Sugarloaf State Forest, Compartments 380, 381 & 382. identified two areas of rainforest where logging has occurred in the rainforest. One of these had been mapped by the EPA (2016) as Lowland Rainforest at the time of logging in October 2016.

It is clear that yet again the Forestry Corporation learnt nothing from their logging of Endangered Ecological Communities in Cherry Tree State Forest. Many of the other offences exposed at Cherry Tree, particularly the damage to habitat trees, were replicated at Sugarloaf SF. The EPA have once again been proven to be ineffective regula

Since Forestry Corporation has proven over and over again they are incapable of complying to regulations and meet the unachievable timber quotas promised to the timber industry Forestry Corporation and the EPA now want to remove those regulations meant to protect our head-water streams and threatened species. Conservation groups across NSW including the North Coast Environment Council and our member groups oppose renewal to the IFOAs and call for an end to logging of our public native forests. To raise awareness about the management of our public native forests in NSW and the proposed removal of environmental regulations meant to protect our threatened species prompted our members group to create a film outlining our forests in the “Your Forests” film. Included below is the text of this film which had input from our different member groups, the Nambucca Valley Conservation Association, NCEC committee members and NEFA. We ask you to accept this script as a comprehensive document outlining why we oppose the rollover of the IFOAs and promising again timber yields to logging companies that are non existent.

“Your Forests” - film on the NEFA YouTube Channel: <https://www.youtube.com/watch?v=AN-SRJJJG2E>

<p>“Your State Forests – too important to clearfell and burn”</p> <p>presented by the North East Forest Alliance –</p> <p>forest conservation groups and individuals of the NSW north coast region.</p> <p>The State Forests of Northeast NSW are publically owned by you and me</p> <p>and they are facing a crisis.</p>
<p>Intensive logging as we have never seen before,</p> <p>occurring across the Northeast region and degrading our public native forest estate</p>
<p>A lot of us here today are living on the North Coast because of its natural beauty – its forested mountains and slopes - connecting to the sea</p>
<p>Public native forests have been logged since European settlement, sometimes heavily, but since at least 2009 industrial scale logging has become the norm on the north coast.</p>
<p>Clearfells such as this one in Kerewong State Forest are now commonplace.</p>
<p>The State Government is proposing to zone 140,000 hectares of public native forests between Grafton and Taree for a clearfelling regime - shown here in red. This will entrench the devastation of these forests.</p>
<p>Already many State Forests - such as Gladstone SF near Bowraville,</p> <p>seen here in August 2005, . . .</p>
<p>Look like this in November 2013 after the intensive logging.</p> <p>How did it come to this?</p>
<p>To answer that question we wind back the clock to the 1980's when the community became alarmed by the rapid loss of oldgrowth forests and hollow-bearing trees, many hundreds of years old, some with some over a thousand years old..</p>
<p>We also became aware that Steep land logging was causing massive soil erosion like here at Mt Killiekrankie where it was later found by a government report that over 88,000 tonnes of soil had eroded from the logging site</p>

<p>And . . . That logging displaced and killed the wildlife living in the forest</p>
<p>So . . . the community exercised its democratic rights at many protest sites such as this one to bring attention to damaging logging practices and demand stronger logging rules.</p>
<p>Community concerns were borne out by science:</p> <p>In 1788 Australia had only 12% forest cover</p> <p>200 years later, Australia wide . . . and across NSW. . . half of this forest had been cleared.</p>
<p>For the NSW North Coast . . . in 1750 we had 95% forest cover</p> <p>But by 2002 it had been reduced to only 50% and most of the rest had been logged - with this trend continuing today</p>
<p>National Parks were mostly too small or too steep to protect the variety of ecosystems and ensure the survival of unique Australian plants and animals.</p> <p>North East NSW had a grossly inadequate reserve system</p>
<p>So governments promised two things:</p> <p>Establishment of a Comprehensive, Adequate and Representative Reserve System and</p> <p>Use of Ecologically Sustainable Forest Management, to maintain the health of our public native forests</p>
<p>Scientists worked out how much habitat was needed for each threatened forest dependent species to survive ... like the state vulnerable Barking Owl And minimum habitat reservation targets were set for inclusion in new parks</p>
<p>In the public native forests where logging would continue there was to be rules to protect:</p> <ul style="list-style-type: none"> ! old growth, rainforest, wetlands and endangered ecological communities ! habitat around records of those threatened plants and animals most vulnerable to logging ! hollow-bearing trees and the mature trees needed to maintain them in perpetuity, and ! creek banks, water quality, steep erodible lands <p>And To maintain forest structure and forest values, selective logging had to retain 60% of the trees or be limited to ¼ hectare patches.</p>
<p>As a community we can be proud of our “people power” efforts back in the 1990’s</p> <p>As a result, since 1995, the total area of new National Parks in north-east NSW has increased by some one million hectares to 2.03 million hectares</p>
<p>And the logging rules have protected many areas, though not all, of rainforest and old growth within State Forests</p> <p>You may think that what was done in the 90’s with new parks and logging rules would be enough to save our threatened forest animals and plants</p>
<p>However, forest ecosystem types, animals and plants in north-east NSW remain well below</p>

<p>the national reserve targets, designed to ensure their survival.</p> <p>North east NSW still does not have a reserve system that is comprehensive, adequate or representative, nor logging which is ecologically sustainable – in fact it is considered to have the worst reserve system in Australia (Pugh 2014)</p> <p>For example The Spotted-tailed quoll – a nationally endangered species and threatened with extinction</p> <p>has only 25% of the habitat it needs to survive into the future, within reserves</p>
<p>The Yellow-bellied glider – a state vulnerable species has only 18% of the habitat it needs to ensure its survival – and in fact we have the worst reserve system in Australia. (Pugh 2014 CAR Reserves nefa.org.au)</p>
<p>The Powerful owl has only 14% of its habitat target met</p>
<p>Forest animals preferring coastal forests, such as the Koala, were the most poorly protected because these are the very forests preferred by the timber industry.</p> <p>The logging rules were inadequate and poorly implemented leading to the koala now being listed as a State Vulnerable species.</p> <p>Koala numbers have crashed by 50% across north-east NSW in the last 20 years as larger trees and mature forests disappear.</p> <p>In State Forests only 14 hectares per year over that time has been protected for koalas - And that's only temporary protection until the next logging operation</p>
<p>In fact today there are over 1000 threatened animals and plants in NSW and new ones being added frequently like the Greater glider</p>
<p>And forest plants aren't faring any better with many joining the ranks of North east NSW many threatened species.</p> <p>Plants can't move avoid logging machinery and consequent exposure.</p>
<p>The main reason threatened plants and animals are inadequately protected is that the Wood Supply Agreements (Contracts) given to the timber industry in 1998 committed 269,000 cubic metres of large high quality logs per year for 20 years - to 2018 – to the timber industry for free.</p> <p>Scientists warned at the time this was an overestimate of available timber and would entrench unsustainable logging.</p> <p>As the timber dwindles the protections for threatened species and streams are being progressively reduced to prop-up supply.</p>
<p>After only three years a review found the long term sustainable yield to be 40% less than what was promised</p> <p>In 2003 the annual volumes committed in contracts were decreased by 15% but made "compensatable" and extended out to 2023 increasing the total volume promised to the timber industry.</p>
<p>In 2009 the Auditor General's report found that unsustainable logging was still going on.</p>
<p>In 2014 the State Government paid Boral 8 and a half million dollars to buy back 50,000</p>

<p>cubic metres of sawlogs a year, for 9 years.</p> <p>At the same time, unbelievably, they extended Boral's contract for a further 5 years out to 2028, giving them guarantees for more timber than had been bought back from them.</p> <p>Since 1998 it has cost NSW taxpayers more than 12.9 million to buy back timber that never existed.</p>
<p>But let's turn and look at some of the non-timber values that public native forests provide if left to grow old:</p>
<p>Abundant and clean water...Old growth forests release twice as much water to catchments as young forests which are thirsty, use up water and dry out landscapes</p>
<p>Mature, intact forests create humidity and help generate rainfall</p>
<p>They clean and filter water as it moves downhill</p>
<p>Through the landscape and benefitting farms and downstream coastal town water supplies</p>
<p>Native forests play a significant role in the capture and storage of carbon thus helping to mitigate climate change</p>
<p>Old growth forests store more carbon than young forests with the biggest and oldest trees storing 4 times the amount as young trees</p>
<p>The economic value of native forests if left unlogged is huge</p> <p>Across NSW they could be generating \$40m a year if the Federal Government made them eligible for the Emissions Reduction Fund</p>
<p>Another forest value is biodiversity.</p> <p>Our North east native forests are home to a huge variety of unique plants and animals</p>
<p>Of special importance for these animals are the big, old trees</p> <p>An incredible 303 species, Australia wide, need tree hollows to survive – a hundred of these are threatened.</p> <p>Hollows take over a hundred years to develop and are becoming scarce</p>
<p>The koala is one of our threatened animals.</p> <p>Koalas have evolved with eucalypt forests over millions of years and are unique in world terms</p> <p>Habitat loss is the greatest threat to koalas</p>
<p>Northeast NSW forests contain the most diverse tall eucalypt forests in the world</p> <p>And are part of an internationally recognised biodiversity hotspot</p> <p>Tallowwoods such as these are one of the main food trees of the koala</p>
<p>Mature, intact forests provide many opportunities for recreation and tourism</p>
<p>The over 9 million visitors to National Parks of Northeast NSW in 2010 generated \$348 million dollars into regional economy</p> <p>And more than 2 ½ thousand jobs.</p>

<p>Forests also support our cultural, aesthetic, medicinal, scientific research, and spiritual needs</p>
<p>Every single value we've talked about increases as the forest ages</p> <p>And declines with increased logging intensity</p>
<p>So, what's gone wrong? when the logging rules were supposed to ensure ecologically sustainable logging....This is Newry State Forest in 2010</p>
<p>Three years later it looks like this</p> <p>Selective logging or patch logging that gives a degree of protection to non-timber forest values was promised.</p> <p>The promise has been broken</p>
<p>When you go out into the forest these days you see what kind of forest management we have instead.</p> <p>There is massively increased logging intensity</p>
<p>There's larger, industrialised logging machinery</p>
<p>These machines need wider turning circles and roads</p> <p>This one in Buckra Bendinni State Forest is 24m wide</p>
<p>And they need larger cleared areas for log dumps like this one at Bulls Ground State Forest</p> <p>The arrow points to a second person</p>
<p>Jobs</p>
<p>Intensive logging turns our public native forest into plantation-like forest: made up of mostly young trees and of the same – or very few - species</p>
<p>Old growth trees are still being logged like this one at Girard State Forest in 2013</p>
<p>In fact, old growth is only protected if it is in a patch of 10 hectares or more – an area larger than 14 Rugby League football fields</p> <p>This approximately 400 year old Tallowwood when standing would have been over 69m tall – taller than the Sydney Opera House at 67m</p>
<p>The intense logging leaves larger canopy openings too letting in bright light, drying out the ground and facilitating weed invasion.</p> <p>In fact this is the intention of Forestry Corporation: to replace moist forests with drier Blackbutt forests as it's a faster growing timber tree</p>
<p>So ... we have declining forest health as seen her in Viewmont State Fore</p>
<p>We have over 100,000 hectares of Bell Miner Associated Dieback related to logging across NSW's forests</p>
<p>When logging removes the canopy and disturbs the soil, lantana can proliferate. Bell Miners love the altered structure, breeding in the lantana, mobbing and chasing away competitors. They farm sap-sucking insects called psyllids, that feed on the tree sap,</p>

causing the trees to sicken and die.)
<p>Routine post logging burning dries out soils, damages remaining trees and further impacts on disturbed and displaced forest animals.</p> <p>It also contributes additional carbon emissions and leaves the forest more fire prone and vulnerable to weed invasion.</p>
<p>And we have broadscale clearfelling, being carried out under the term "Single Tree Selection" which the Minister has acknowledged, in writing, as being "Outside the authorisation" of the logging rules – illegal</p> <p>The government's plan is to legalise it across more than 100,000 hectares of coastal public native forest between Taree and Grafton converting much of the north coast's public forests into "quasi-plantations".</p>
<p>And all this we pay for!!</p> <p>\$79 million dollars over the last 7 years to prop up such a damaging industry</p>
<p>Even the old foresters are speaking out – not wanting to go to work because they were destroying the place</p>
<p>One, even calling it criminal what they've done to the bush – knocking down 200 years worth of timber in the last 20 years</p>
<p>Yet logging intensity has continued to increase</p>
<p>As if that's not enough, the State Government intends to abandon pre-logging surveys for most threatened forest animals and plants, to remove their protections, and reduce buffers on vital headwater streams</p>
<p>Reducing streamside buffers from 10 metres to 5 metres will increase sediment pollution of streams and impact directly on many aquatic plants animals including the Endangered Purple Spotted Gudgeon - a freshwater fish which needs clean water to survive.</p> <p>This fish was thought to be extinct in NSW until it was rediscovered in 2002. Logging in close proximity to head water streams risks the very survival of this rare species.</p>
<p>Governments' even have a plan to burn public native forests for energy generation which will result in high carbon emissions and damage biodiversity, soils and water catchments.</p> <p>Feeding trees into furnaces for power creates more carbon emissions than burning coal.</p>
<p>Conservationists no longer believe that Forestry Corporation is capable of Ecologically Sustainable Forest Management and are now calling on the State Government for an end to logging of public native forests</p> <p>and a rapid transition to a 100% plantation based timber industry.</p> <p>Already 84% of NSW log production comes from plantations.</p> <p>((Logs obtained from native forests have halved over the past decade.))</p>
<p>Once again it is time to exercise our democratic right to peacefully stand up for our natural heritage - our north coast forests - to be protected for future generations.</p>

The Great Koala National Park Proposal by the non government National Parks Association is a positive step to providing an alternative use for our public native forests and is one of a number of proposals for new reserves across the Northeast region
These parks will bring long term protection for our Water, Carbon stores, Biodiversity, Recreation and Jobs
As we all take the leap into the future...

Impacts of logging intensity around North Coast Towns

The proposal is to establish 3 zones where logging is only limited by basal area retention. These will be a 140,000ha North Coast Intensive Zone covering Coastal forests south from Grafton to Taree, a coastal "regrowth" zone and an escarpment "non-regrowth" zone.

This sections draws attention to the potential impacts of increased logging intensity on a number of north coast towns. It points out that the communities in the towns of the north coast have never been effectively consulted on the nature and extent of these impacts.

Within the loggable area of the 140,000ha North Coast Intensive Logging Zone the requirement will be to retain up to five hollow-bearing trees per hectare, and in modelled Koala habitat up to five – 10 Koala feed trees per hectare (where they still survive). 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 and habitat clumps. 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 the clumps (which is likely) then they will be able to clearfell patches up to 45ha in extent.

The reason it is being done isto increase short-term yields and to convert native forests into what the EPA call "quasi-plantations".

Under the current IFOA two logging regimes are allowed: Single Tree Retention (STS) and Australian Group Selection (AGS). STS is the only logging regime currently practiced.

The current intensive logging regime (Australian Group Selection) limits the size of cleared patches to 0.25 hectare (50m by 50m), and requires logging be excluded from 10% of the net logging area.

Current requirements for Single Tree Retention are for 60% of the basal area (area of the cross section of a tree trunk) of the trees in a harvesting area, including all trees under 20cm diameter, to be left after a logging operation.

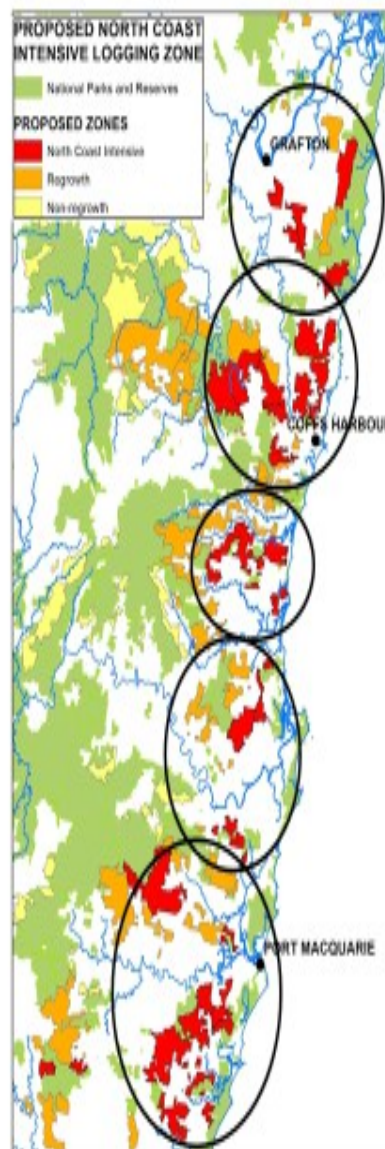
In a natural forest basal area can vary from as low as 18m² ha on a low productivity site, up to 47m² ha on a high quality site (Smith 2000), with up to 60m² on better quality sites, The NRC effectively identify the basal area range as 17-40m² per hectare, identify the current 60% retention requirement as equivalent to the retention of 10 to 24 m² per hectare. The classic study on Blackbutt Forests by Florence recommended retention of a minimum basal area of 22m² per hectare.

The proposed North Coast Intensive Zone is for alternative coupe logging, with coupes limited to 45ha. 10% of the loggable area is required to set aside as wildlife or habitat tree clumps. For 90% of the loggable area there are no minimum basal area retention requirements. Retention of up to 5 remaining hollow-bearing trees per hectare, and koala feed trees (within modelled habitat) require retention - preferably within wildlife and habitat tree clumps. So if the tree retention requirements have been met in the clumps (which is likely) then they will effectively be no constraints on most of the 90%, meaning that large areas can be clearfelled with at best a few small retained trees. Up to 2,200ha is allowed to be intensively treated each year, with clearfelled patches of 45ha (60 ha clearfells will be allowed for the first 2 years).

The EPA (NRC 2016) argued the baseline for intensive logging should be Australian Group Selection, though never-the-less argued for maximum 30ha clearfells with 21 years between clearfells and 10 years between adjacent clearfells. The Forestry Corporation wanted 60 ha clearfells with 14 year return times and 7 years between adjacent clearfells. The NRC went with 45 ha clearfells, 21 year return times and 10 years between adjacent clearfells. Though the Forestry Corporation will just do what they want.

Since 2006 the Forestry Corporation have been practicing an illegal form of Single Tree Selection called "Regeneration Single Tree Selection" where they have been taking up to 90% of the basal area. NEFA have been complaining about this for years, leading the EPA (2016), on behalf of the Environment Minister, to admit this *"is not consistent with the definition and intent of STS (Single Tree Selection) in the Integrated Forestry Operations Approval (IFOA) as well as FCNSW's own silvicultural guidelines."*

Despite its illegality the NRC (2016) consider that as the Forestry Corporation have been practicing "Regeneration Single Tree Selection" since 2007 they would adopt this as **Current harvesting practice** to reference proposed changes against. They give the parameters as *"no upper coupe size limit, coupes range in size from 5 hectares to over 100 hectares, 4 harvest cycles, 7 year average gap, 21 years until all harvested"*. This is a big difference from 60% basal area retention and retention of all trees <20cm., which is the current regime that the EPA recommended should be the benchmark.



Increased logging intensity around major North Coast towns

Grafton

North Coast intensive (45ha virtual clearfells)		regrowth (double logging intensity)	
Bom Bom	846	Pine brush	3719
Dvines	1541	Newfoundland	6215
Barcoongere	286	Southgate	627
Candole	6507	Woodford North	212
TOTAL	9,180	TOTAL	10,773

Coffs Harbour

North Coast intensive (45ha virtual clearfells)		regrowth (double logging intensity)	
Pine Creek	3511	Bagawa	5405
Orara West	4697	Kangaroo River (90%0	9835
Orara east	4193	Boambee	943
Lower Bucca	2743	Tuckers Nob	874
Wedding bells	5230	Sheas Nob	4467
Nana Creek	1833	Boundary creek	2533
Kangaroo River	10928	Clouds creek	11907
Wild Cattle Creek (10%)	1093	Ellis	9678
Bagawa (50%)	2702	Hyland	4875
		Merango	10259
		Bagawa (50%)	2702
TOTAL	36, 930	TOTAL	60,776

Bellingen

North Coast intensive (45ha virtual clearfells)		regrowth (double logging intensity)	
Gladstone SF	6716	Pine creek	3511
Newry	4071	Tuckers Nob	4338
Little Newry	177	Never Never	99
Irishman	2752	Scotchmans	3988
Tarkeeth	1424	Diehappy	1373
Nambucca	1754	Roses Creek	1654
Viewmont	886	Oaks	8142
		Irishman	2752
		Muldiva	
TOTAL	17,780	TOTAL	25,857

Kempsey

North Coast intensive (45ha virtual clearfells)		regrowth (double logging intensity)	

Tamban	7405	Coolambatti	4422
Way Way	1279	Old station	231
Karlteenee	1247	Skillion Flat Ball angarra	5
Maria River	2068	Ingalba	6735
TOTAL	11,999	TOTAL	11,388

Port Macquarie

North Coast intensive (45ha virtual clearfells)	regrowth (double logging intensity)		
Brill Brill	2316	Cairncross (p)	5873
Bellangary (p)	6267	Ballengarra	6572
Mount Boss	15721	Kippara	5489
Corrawa		Bellangary(p)	6267
Burrawan	2412	Pappinbarra	1274
Queens Lake	484	Mount Boss	15721
Broken Bago	3857	Doyles River	5050
Kendall	422	Bulga (p)	14474
Middle Brother	2302	Dingo (p)	3397
Johns River	1266	Knorrit	5116
Landsdowne	4492		
Coopernook	842		
Comboyne	3059		
Upsalls Creek	879		
Kerewong	3493		
North Branch	865		
Lorne	3824		
Bulls Ground	2108		
Kew	921		
Dingo(p)	3397		
Bulga(p)	14747		
TOTAL	73,674	TOTAL	69,233

Forest Health

Many of the Upper North East forests are severely impacted by Bell Miner Associated Dieback which require urgent restoration, not further logging disturbance.

The declaration of 'Forest eucalypt dieback associated with over abundant psyllids and Bell Miners' as a Key Threatening Process was made in 2011. The end result of severe BMAD is total ecosystem collapse, with loss of all forest values including wildlife, carbon storage and timber.

The recent independent causal review of BMAD (Silver and Carnegie,2017) clearly identifies canopy disturbance (ie logging) as the primary causal factor in the development of BMAD. This latest research was not included in the RFA reviews and has not been given consideration in the IFOA remake.

There are more than 100,000 hectares of BMAD impacted forests in the Upper North East. The Forests in the Border Ranges and Richmond Range are particularly badly impacted as a legacy of unmitigated and unsustainable logging practices, making a lie of any claims that Ecologically Sustainable Forest Management has been practiced over the past twenty years.

Forest corps 'adaptive management trials' at Donaldson and Mt Lindsay State Forests have failed to demonstrate that Forest Corp is capable of managing post logging BMAD development. The trials indicated a cost of up to \$2500 per hectare to repair severely impacted forests.(This does not include ongoing follow up treatments required over many years to prevent reoccurrence.) It is no wonder that Forest Corp now consider five State Forests in the Border Ranges , covering 11,000 hectares, '*impractical to manage for commercial purposes*'.

The occurrence of BMAD is spreading in Coastal forests from the Queensland Border to the NSW South Coast. A further twenty or more years of more intensive logging will be the death knell for many hundreds of thousands of hectares of moist coastal forests due to logging induced BMAD. It is time to restore the health of public forest estate, not subject it to further intensive, unsustainable exploitation.

he NSW Government promised that any changes to the IFOA would result in no loss of timber and no decrease in environmental values.

They have certainly delivered for the logging industry. But like much else that they do in environmental policy, the proposed changes will be devastating for the environment.

Despite the Government having paid out more than \$12.5m for being unable to supply timber committed, FCNSW called for Expressions of Interest for new timber contracts in January 2018.

That it could do so, prior to the IFOA or RFAs being finalised only demonstrates what a parody of a process this is. There is little doubt that all of the key decisions have been made, and were made, several years ago, and that the public consultation is a sham. This is further underscored by the complete failure of the department to provide any outreach or briefings to the public. Best keep it in the dark and draw as little attention to it as possible.

Considering that the public forests of NSW are a significant asset of the people, this approach shows the contempt in which we are held, and the agenda of privatisation by stealth. By awarding wood contracts that require broadscale clearfelling and intensive logging across the forest estate, the companies that benefit are profiting at the expense of current and future generations.

This intensive logging regime will see the overall age of the trees in the State Forests be reduced to juveniles. As such their ability to store water in their root systems and carbon in their bodies, will be greatly diminished. They will become more susceptible to fire and require more water to survive.

Effectively, this logging policy will lead to the drying out of the landscape, with less downstream water produced, a higher likelihood of wildfire, greater carbon release and diminished number of and diversity of plants and animals.

Only those who are in denial of climate science, which is unequivocal in its predictions of rising temperatures and more extreme weather events, would think that diminishing one of our greatest mitigating natural assets is a good idea.

FMZs 1,2 and 3a

These are known as Forest Management Zones, 1, 2 and 3a or Special Management Zones when they are protected by an Act of Parliament. They form part of what the State and Commonwealth Governments deemed to be a Comprehensive, Adequate and Representative reserve system. The areas within these exclusions counted towards all of the targets of the Comprehensive Regional Assessment (CRA). When any area is removed from the reserve system, it should trigger a re-analysis of targets, as areas weren't just protected as oldgrowth for example, but all of the habitat values of relevant fauna species that overlaid that area were also counted.

The proposal from the NRC, which has clearly failed on its mandate to provide advice that won't damage environmental values, that areas of oldgrowth and rainforest be reexamined and 'where found to not be oldgrowth or rainforest' be opened up for logging, is deeply flawed.

All parties to the recognised that there would be some errors in the mapping, but that these errors would cut both ways. That is, areas of oldgrowth and rainforest would not have been identified, and thus end of in the logging zones and there would be some that had been mapped as oldgrowth that could also have been in error. The phrase at the time was 'swings and roundabouts'. We all acknowledged this but having a definite map provided more certainty and less subjectivity for all interests. It also needs to be recognised that areas of oldgrowth smaller than 10 ha were not identified or given any protection. Also, the oldgrowth protected as High Conservation Value, was only a subset of the oldgrowth actually identified during the CRA. All the 'disturbed oldgrowth' was made available for logging from the outset, as was a considerable amount of the non-disturbed oldgrowth. The original target for oldgrowth was only 60%. So many areas of oldgrowth were not included in the original protected areas. These have no doubt been logged in the life of the RFA.

By now opening up areas that have been protected and subjecting them to a mapping process which has had no stakeholder consultation, unlike the previous mapping which was with agreed parameters, FCNSW is effectively given carte blanche to log these important areas.

Anyone paying attention to forestry for the last 20 years would realise that there is virtually no environmental regulation or oversight. The EPA is a lap-dog. It's most extreme version of regulation involves writing a warning letter. It has shown itself incapable of upholding the licence conditions and has refused to act in a way which would have clarified the licence or sought amendment to strengthen clauses it thought difficult to audit.

The idea that EPA or NRC are going to oversee the remapping of OGF and Rainforest would be laughable, if the environmental consequences were not so dire.

This re-mapping is supposedly to enable a timber shortfall to be met. And it is clear from the examples provided in the Draft IFOA, that under the methodology, the overwhelming majority of those areas protected will become available for logging- some 80%.

The NRC, whose brief is clearly about resources rather than nature, doesn't seem to have considered all the other values, other than timber, that these areas represent. The suggestion that they can be compensated for by adding 'steep slopes.... and other non-commercial areas' displays incredible ignorance about the relative values of steep land for most ecological values.

Riparian Exclusions and Threatened Fish

The proposed new IFOA will halve the protection on most headwater streams. The argument put forward for this is that there are more of them now that LIDAR has been used to identify them. Just because there are more of them doesn't lessen the science that requires riparian buffering and that science actually suggests 30m would be more appropriate. The current proposal for 5m, will give access to many large old trees that were found inside the 10m buffer. Because of the way the 5m is to be applied, any tree that is not below the top of the bank will be up for grabs.

The Environment Department has argued that the riparian strips form important wildlife corridors. Conservationists agree, but think that they should be wider. What is being proposed is basically nothing. Any tree with timber values will be taken. Who will check? We know the answer to that and it is no-one unless it is a passionate volunteer who in their naivete thinks that by pointing out a breach of logging conditions something will change and someone will be penalised.

We know from numerous forest audits however, that this is extremely unlikely.

One impact of this change will be a decline in water quality, which in turn will have serious implications for the region's threatened fish such as the Eastern Cod and the Purple-spotted Gudgeon.

It is important to note that all of the experts consulted as part of the Threatened Species Expert Review Panel opposed the opening up of these riparian areas that have been protected from logging for the last 20 years.

The most emphatic of these was Brian Tolhurst of the EPA who said

"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 native forest.

...

I am not convinced that the proposed riparian buffers are adequate for ecological protection of these features. The widths seem to have been generated to deliver no net loss of available harvestable area rather than driven by an appropriate buffer for the size/importance of the feature".

And yet, it is proposed to halve these buffers. Again, this will clearly result in significant decline in environmental values... but that was obviously the 'non-core' part of the commitment.

Koalas

The Chief Scientist in her [report](#) published December 2016, on the decline of Koala Populations in NSW said as part of her recommendations:

"Within six months of receipt of this report, it is recommended that a priority research project is commenced to better understand how koalas are responding to regeneration harvesting forestry operations on the mid-north coast of NSW. The project will assess the effectiveness of current and proposed prescriptions designed to mitigate the impacts of forestry operations on koalas in these areas."

Not only has this research project not been undertaken, but this recommendation has been completely ignored and regardless of the impact of 'regeneration harvesting' on koalas, it is to be embedded within the IFOA at a breath-taking scale. All of those bureaucrats and politicians responsible for this criminal destruction of koala habitat that will see koala populations continue to

hurtle towards extinction, will be able to tell their children, that they played a role in the demise of the iconic species. What a legacy!

The proposal to introduce widespread clearfelling across some of the most important koala habitat in northern NSW is truly reprehensible. The NSW Recovery Plan for the Koala (DECCW 2008) identifies that the loss and degradation of habitat is the most significant threat facing NSW koala populations. Koalas have been found to have a preference for mature trees of specific species in the size range 30-80cm. In the CRAs, a significant threat to Koalas was identified (Environment Australia 1999) as *“Logging that fails to retain stems in the 30-80 DBH size class”*.

Such trees will be few and far between in the forests of the future, just as they are around Eden, where logging has almost completely extinguished all but a few very small koala populations. And the new koala prescription only requires retained koala trees to be greater than 20cm dbh. From experience, the trees will be left as the smaller damaged stems amidst a sea of carnage. The idea that this will provide habitat for a species already prone to stress is fantasy.

Large Trees

One of the major failings of the IFOA for the last 18 years, has been its failure to protect habitat trees from damage. Almost every logging operation sees retained trees damaged by careless operations and by the piling up of woody debris near the tree that will see it damaged by fire. Large trees are disappearing from our landscapes. The results of the Private Native Forestry assessment carried out this year by DPI suggest that on private land they are now almost non-existent.

That the NRC over-rode the proposal from the EPA to retain trees greater than 120cm (135cm for blackbutt) is appalling. Again, the decision was taken based on timber volumes rather than any other consideration.

Again, it was the EPAs Brian Tolhurst who was prepared to put on the record the importance of retaining large trees:

“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.”

Threatened Species

What can we say, except there will be more species that will move towards extinction and more individual animals and plants which will perish as a direct result of logging.

In NE NSW the proposed changes will see 228 species of threatened plants (72%) lose all protection and 28 species (9%) have reduced protection- if identified! Most species either required 20m or 50m exclusion areas around records. Of the 91 species currently requiring 50m buffers (ie 0.79ha) around records, 79 will have all protection removed and the rest will have buffers reduced to 20m (i.e. 0.13ha).

But without surveys most of these plants will go undetected and be destroyed by logging.

Similarly for threatened species of animals. Most will no longer require species specific surveys. Threatened frogs will be particularly at risk due to the diminished requirements for riparian protection and the significant loss of protection around records of these species.

Timber Volumes

It is not possible to get a clear picture of the current state of NE NSW timber volume commitments, allocations and yields.

FCNSW Annual Reports provide amalgamated figures for hardwoods. What we do know, is that \$12.5 m of public money has been spent buying back timber allocations. The 50,000m³ bought back from Boral in 2011 was effectively re-allocated to them with a wood supply extension until 2028. So they get the money, and more timber than the original WSA specified.

Then, earlier this year, FCNSW sought EOI for more timber allocation. This before RFA reviews, extensions, IFOA changes etc. That is, once again, FCNSW attempts to deliberately force the taxpayer to subsidise the logging industry by entering unsustainable wood contracts. So unsustainable, that we are told, that areas of forest protected for 20 years has to be made available for logging to meet timber short-falls.

Now it would appear that despite the Boral buyback, FCNSW have been supplying some 20,000m³ of timber above what was allocated for the last 2 years. But the NRC says there is a timber short-fall. So why would FCNSW be supplying additional timber if there is a short-fall? The lack of transparency around timber volumes and the failure of the NRC to investigate the figures provide by FCNSW is symptomatic of this "process", which is about maintaining vested interest access to public resources at the expense of the public. We as a society, will pay many times over for the damage to our forests, biodiversity, water reserves and climate.

The NCEC would like to thank you for the opportunity to make a submission for the draft coastal IFOA and strongly object to any rollover of the RFAs or the coastal IFOAs.

Regards,



Jimmy Malecki

Secretary North Coast Environment Council