



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

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**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 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

Yes      No      Yes, but anonymous

**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 new IFOA fails to properly address the most important issues of ecologically sustainable forest management, climate change and the ever increasing widespread wildlife species loss and endangerment. Additionally, in failing to address these issues adequately, the IFAO demonstrates the irresponsibility of the government in providing for the future health of the NSW environment, our native wildlife, healthy water supply, and ultimately a future viable timber supply.

**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?**

**NONE. The IFOA is essentially protecting and promoting the timber industry over and above any environmental, long term safeguards.**

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.

**The IFOA also fails to address the issue of producing sustainable timber in a manner which will support the timber industry into the future. Through this failure it fails to protect our existing natural environment.**

**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 whole of the draft Coastal IFOA will have negative outcomes on both.



The removal of the need to survey for and protect threatened plant and animal species will be negative.

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 an appalling proposal when we have a clear responsibility to try to reduce species loss.

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’.

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. These are wild animals which is exactly the point, they need natural, adequate forests to survive in.

As far as sustainable timber goes, logging natural forest and, most particularly, old growth forest is NOT sustainable. The IFOA does not promote sustainable timber getting.

#### 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)?

**Clearly the IFOA fails to provide effective, permanent environmental protection, at any level. Previous protections that were in place have been would back being replaced with either inadequate or unenforceable objectives.**



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

The new IFOA fails to properly address the most important issues of ecologically sustainable forest management, climate change and the ever increasing widespread wildlife species loss and endangerment. Additionally, in failing to address these issues the IFAO demonstrates the irresponsibility of the government in providing for the future health of the NSW environment, our native wildlife, healthy water supply, and ultimately a future viable timber supply.

The logging industry is heavily subsidised and cannot guarantee future job number security. Over logging has already resulted in pressure on sawlog resources. Current jobs are accounted to be 0.03% of primary industry employment. Meanwhile the coastal tourist industry is ever expanding and has a buoyant future but it relies heavily on the attractions of the natural environment. The IFAO, if implemented, risks these natural attributes ultimately threatening a far greater employment industry than that of timber.

The impacts of logging on threatened species is well documented and described as at crisis. The loss of hollow bearing trees is a critical key threatening process, bell-miner associated dieback is ever increasing, exacerbated by logging and seriously reducing the ecological value of forests.

Amongst the many native animals threatened by the habitat loss of logging are the koala populations that the government has expressed a clear intent to protect. The IFOA proposal directly counters this intention, even threatening already mapped koala habitat in state forests.

Our native forests protect and ensure our water supplies. With an ever increasing population it is the responsibility of government to ensure that water catchments are not threatened. The IFOA does not ensure this protection but endangers it.

Clear felling of coastal forests has enormous impact, not just in terms of habitat loss but also due to the resultant sedimentation of water supplies due to the NSW coastal geology.

We have a global responsibility to protect our old growth trees. Re-mapping and re-zoning of any old growth forest should not be considered, or undertaken, there should be no consideration given to logging old growth forests.....or any giant trees. These natural



attributes must be maintained in the face of climate change and for their immense value in promoting rainfall further inland from the coast.

Prior to any progress of this IFOA the state government must undertake a much more holistic review to truly estimate the value of the logging industry and its longer term viability. The vital components of issues such as: climate change, water quality resource, ecologically sustainable forest management, wildlife species decline, key threatening process habitat loss, the intrinsic value of old growth forest and giant trees, socio-economic issues, the value of tourism, the *long term* future of a logging industry as opposed to short term timber availability, along with the alternative value of state forests as important animal refugia and tourism providers rather than timber sources. Investment in sustainable plantations which do not involve the felling of existing native forest must be implemented.

The current predicament of the NSW logging industry can be attributed to previous over-logging practices with current financial subsidies indicating the need for change. Ecological and environmental pressures further demand that the current IFOA proposal is not implemented.

## 6. General comments