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**Make a submission – Contact Details**

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**Country\*:** Australia

**Stakeholder type (circle)\*:**

Community group	Local Government	Aboriginal group
Industry group	Other government	Forest user group
<b>Environment group</b>	Individual	Staff

**Other, please specify:**

**Organisation name:**

Australian Rainforest Conservation Society Inc

**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 please

**Can the EPA make your submission public\* (circle)?**

**Yes**    ~~No~~    ~~Yes, but anonymous~~

**Have you previously engaged with the EPA on forestry issues?** No



### **Make a submission – Form**

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

**All of them. See General Comments below.**

**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?**

**There are few if any positive outcomes for environmental values. All are for timber production. See General Comments below.**

**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?**

**There are few if any negative outcomes for timber production. All are for environmental values. See General Comments below.**

**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)?**

**See General Comments below**

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

**No. See General Comments below.**

**6. General comments**

**Introduction**



Whereas we are responding to the request for feedback on the Draft IFOA, we recognise that the overall process is constrained by Government policy. As reported by the Natural Resources Commission (NRC) and incorporated in the Overview in the Executive Summary, the Government has made a commitment that the Coastal IFOA will result in no change to wood supply and no erosion of environment values. In our view, realising that commitment is not possible. The NRC initially came to the same conclusion, but the Government responded with supposed solutions as did the NRC.

The framework for the Draft IFOA was set by the Government's commitments. It is clear to us that the position taken by the Government was based on supporting the native forest timber industry with no real understanding of the impact on ecological integrity of the forests and the implications for climate change. Hence, the Draft IFOA becomes a justification for the Government's policy position. Of the two commitments made by the Government, "no change to wood supply" can be clearly defined but "no erosion of environmental values" could come down to a matter of opinion. The objective regarding environmental outcomes requires detailed description. Are we content to accept that biodiversity can be protected by excluding certain areas from logging or do we want to protect biodiversity wherever that is possible? In the view of many, that comes down to the notion of 'balance'. But the possibility of achieving balance between conservation of nature and development was lost long ago. We note that the Executive Summary states that the "NSW Government considers that the draft Coastal IFOA ... provides an 'appropriate' balance between maintaining environmental values and wood supply." A definition of 'appropriate' is required.

In summary, we consider that the primary objective of the IFOA, as drafted, is to maintain current levels of wood supply with environmental outcomes being framed to allow that primary objective to be achieved.

### **General comments**

The fundamental issue is that the Draft IFOA aims to entrench practices that are no longer appropriate if we are to protect biodiversity and ecosystem integrity and mitigate climate change. It ignores current knowledge of the impacts of native forest logging and will inevitably lead to loss of biodiversity and potential ecosystem collapse on a wide scale.

The Draft IFOA completely ignores the impact of logging mature native forests on greenhouse gas emissions. There is ample evidence that forests have a major role in mitigating climate change and the best thing we can do in this regard is to leave the carbon stores where they are and let the large trees go on accumulating carbon (Keith et al. 2014). Leaving forests standing could also be financially superior to logging them (Campbell & McKeon 2016; Lindenmayer & Mackey 2015).

It might have been expected that the Draft IFOA would enshrine Business As Usual (BAU), but, despite mounting evidence of our biodiversity being in serious trouble, the Draft IFOA goes beyond BAU and will actually increase the impact of native forest harvesting. If the RFAs get extended, it will continue to degrade the forests for another 20 years and possibly longer.

It is becoming increasingly clear that the way we treat the natural environment has to change if we are to protect biodiversity and ecosystem integrity and keep global temperature rise below 1.5°C.

Research in the Victorian Central Highlands indicates that logging practices akin to the proposed Intensive Harvesting in NE NSW are likely to lead to ecosystem collapse (Lindenmayer & Sato



2018). The authors provide data showing the numbers of Greater Gliders in the Central Highlands have declined six-fold over the past 20 years with the likely reason being the loss of hollow-bearing trees.

The State of Environment Report 2016 shows Australia's biodiversity is under increased threat and, overall, has continued to decline. Logging is identified as a significant pressure for many Australian species, including listed threatened species.

Unequivocal evidence exists for Bell Miner Associated Dieback (BMAD) in forests being the result of loss of canopy structure and increase in understorey density especially due to Lantana invasions (Silver & Carnegie 2017). BMAD is listed as a key threatening process under the NSW Threatened Species Conservation Act 1995.

BMAD is potentially threatening very large areas of eucalypt forest in NSW. Causative factors leading to BMAD include timber harvesting which either thins or removes canopies. Given the recognition of the extent of the BMAD problem and of the contribution made to the problem by logging, it would appear imperative to stop logging. The combined impact of logging and BMAD could well lead to ecosystem collapse as referred to above.

## **Specific comments**

### **Objectives**

The underlying objective is said to be maintaining wood supply without eroding environmental outcomes. It has been clear for decades that it is simply not possible to keep harvesting a commercially viable volume of timber from native forests without continually degrading ecological integrity. We understand that many intensively logged areas in NE NSW are now certified by FSC Controlled Wood as 'plantations'.

The draft IFOA "proposes outcome-focused regulation and has moved from a reliance on detailed and prescriptive rules towards stated principles and outcomes to be achieved." In our view, the outcomes as described are essentially procedures and are just a more generalised way of defining rules. Whereas identifying certain areas for protection will have some positive impacts, though short-lived, there is no provision for determining the overall impact on biodiversity. There is no suggestion that actual environmental outcomes will be assessed and reported. What is the expected outcome regarding wildlife of clearfelling 44,000 ha of forest over 20 years and increasing the intensity of harvesting in the rest of the management areas? That question is in no way addressed by the defined objectives.

### **Intensive harvesting**

Apart from the retention of small habitat clumps and tree clumps, intensive harvesting is clearfelling and apparently is to be carried out on a 30-year cycle. The result will be more than 40,000 ha of forest that will never be suitable habitat for the numerous hollow-dependent fauna species that occur in these forests. It represents conversion to even-aged stands equivalent to plantations which would represent ecosystem collapse as defined by the Criteria for the IUCN Red List of Ecosystems.

We are particularly concerned that proposed intensive logging areas adjoin national parks that are on the Tentative List for addition to the Gondwana Rainforests World Heritage Area. Wild Cattle Creek



State Forest adjoins Nymboi-Binderay National Park and Mt Boss and Kippara State Forests adjoin Willi Willi National Park.

There is a common perception that areas set aside for conservation are safe havens for nature. Sadly, that is not necessarily the case. The IUCN 2017 Conservation Outlook Assessment of the Gondwana Rainforests of Australia World Heritage Area rated Overall Threats as High.

There is also research indicating that logging increases the risk and severity of wildfire in eucalypt forests (Taylor et al. 2014). That study found that the risk of canopy fire was greatest in forests that had been clearfelled and were aged between 7 and 36 years. That suggests that areas subject to intensive harvesting would be at high risk as the regenerating forest would be essentially an even aged stand aged up to 30 years. It is highly likely that the World Heritage Area would be affected by the increased fire risk, particularly where State Forests adjoin the World Heritage Area.

### **Wildlife Habitat Clumps**

The impacts of clearfelling are putatively to be mitigated by retaining Wildlife Habitat Clumps and Tree Retention Clumps.

Wildlife Habitat Clumps must cover 75 ha (5% of 1500 ha) in each Local Landscape Area and each clump has only to be greater than 1 ha in area. This could, for example, mean 25 3-hectare clumps over the 1500 ha. Indeed, Protocol 22 provides for Wildlife Habitat Clumps being “habitat islands within a large cutover area”. Such clumps would be essentially useless for many species and referring to them as wildlife habitat is misleading and not supported by evidence.

As an example, we can consider the case of the Greater Glider. The Threatened Species Scientific Committee established under the EPBC Act provided advice to the Minister regarding the status of the Greater Glider, advising a conservation status of ‘Vulnerable’. Logging is identified as a ‘severe’ threat to greater gliders about which the following information is provided by the Committee:

- particularly sensitive to intensive logging
- sensitive to fragmentation
- have relatively low persistence in small forest fragments
- disperse poorly across vegetation that is not native forest
- may require native forest patches of at least 16,000 ha to maintain viable populations
- show no significant movement into unlogged reserves from surrounding logged areas

It is reasonable to conclude from the above evidence that Wildlife Habitat Clumps will be useless to greater gliders and other species with similar requirements.

### **Tree retention**

Whereas hollow-bearing trees and potential future hollow-bearing trees are required to be included in Tree Retention Clumps and Wildlife Habitat Clumps, those clumps together cover only 10–13% of the harvest area. In the other 87–90% there is no requirement to retain future hollow-bearing trees. That means that when existing hollow-bearing trees in that area die and fall, the area will never provide habitat for the numerous hollow-dependent fauna species.

### **Basal Area retention**



In proposing to change the harvesting limit from basal area removal to basal area retention, it is stated that “There is no intent to change the outcomes delivered by current selective silvicultural practice.” That statement is disputed. A non-regrowth moist blackbutt forest could have a basal area of 40 m<sup>2</sup>/ha or even more. In such forests, retention of 12 m<sup>2</sup>/ha represents a 70% basal area removal compared with the current limit of 40% removal as specified in the Forestry Corporation Native Forest Silviculture Manual. By specifying an actual retention area, the original basal area is taken out of the equation, hence allowing a potentially greater harvest volume and greater ecological impact.

## **Conclusion**

It will be clear from this submission that there are many aspects of the Draft IFOA that we do not support. However, we believe there is ample evidence to support exit from native forest timber extraction and transition to plantation sources, with support, including financial support, for affected workers and businesses.

## **Old Growth and Rainforest**

It is proposed that old growth and rainforest be re-mapped using a method developed for private native forestry. When the PNF Protocols were independently assessed in 2010, their application for old growth was found to be “highly variable and problematic” (Webster 2011). We presume that the protocols have been improved but we have been unable to find any relevant information. We are not aware of any community involvement, e.g. of conservation groups, in the development of the protocols.

## **References**

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- Lindenmayer, D.B. & Sato, C. (2018) PNAS Latest Articles, [www.pnas.org/cgi/doi/10.1073/pnas.1721738115](http://www.pnas.org/cgi/doi/10.1073/pnas.1721738115)
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