



We are now accepting email submissions. The form below must be filled out and attached in an email and sent to ifoa.remake@epa.nsw.gov.au If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.

Make a submission – Contact Details

First Name*: David

Last Name*: Smith

Phone:

Mobile*: [REDACTED]

Email*: [REDACTED]

Postcode*: [REDACTED]

Country*: Australia

Stakeholder type (circle)*:

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

Other, please specify:

Organisation name:

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

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 No Yes, but anonymous

Have you previously engaged with the EPA on forestry issues?

NO

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Make a submission – Form

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

All of it. It is fundamentally flawed. The Natural Resources Commission report that accompanied the IFOA proposals states that these proposals will not meet the government's commitments around both environmental values and wood supply. Additionally this does not take into account the effect of threats from climate change and changing fire regimes.

By prioritising timber extraction over environmental protection, the new IFOA abandons the commitments NSW made under the National Forest Policy Statement in 1992, including the concept of Ecologically Sustainable Forest Management. This is a fundamental shift in forest management, occurring with insufficient scrutiny.

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?

Mostly none.

The reinstatement of some headwater buffers is a positive. Decreasing buffers in other areas is not.

No effort has been made to assess the environmental impact of the already now 11 years of intensive harvesting in northern NSW, as a basis upon which to design the new regime, which formalises this practice.

The intensification of harvesting through more and larger clear-felling areas only results in even aged stands of forest in the future – not good environmentally!

The lack of monitoring data upon which to base decisions, and subsequent uncertainty around those decisions leaves one with no confidence that the Forestry Corporation could produce timber sustainably. They haven't to date.

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?

All of it has a negative outcome for environmental values. And very little of will contribute to long-term sustainable timber production.

The changes are supported by almost no data. Sounds like a quick fix to obtain as much wood in as short a timeframe as possible.

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)?

Will be an environmental disaster – not effective at all.

All trees over 100 cm dbh should now be protected regardless of what regimes are adopted in order to preserve hollow-bearing habitat trees.

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

No. Implementing this approach with the degree of uncertainty evident discards the precautionary principle and discards the principles of Ecologically Sustainable Development and Ecologically Sustainable Forest Management.

6. General comments

The new IFOA abandons any semblance of ecologically sustainable forest management (ESFM) by proposing the clear-felling of 140,000 hectares of coastal forests between Grafton and Taree; 'remapping and rezoning' old-growth for logging – which is not based on sound scientific principles; reducing headwater stream buffers – risking significant erosion events; permitting the logging of giant trees and approximately doubling the intensity of logging in the 'selective harvesting zone' – risking the reduction in habitat for many vulnerable native species.

By abandoning ESFM, the government has destroyed the social license of the logging industry. This is shameful.

The new IFOA ignores reality. Widespread declines in wildlife has prompted the Australian Senate to call an inquiry into our threatened species crisis. Over logging has reduced sawlog resources throughout coastal NSW, a fact recognised by the industry itself. The number of jobs and mills has collapsed and logging now accounts for about 0.03% of primary industries employment. This will get worse as climate change and forest dieback make future timber resources increasingly uncertain—an issue highlighted in the Natural Resources Commission report but ignored in the IFOA.

The new IFOA will heighten the impacts of logging on threatened species, and exacerbate key threatening processes such as the loss of hollow-bearing trees and bell-miner associated dieback. The intensive harvesting zone will destroy almost half of the mapped high-quality koala habitat in state forests.

It is becoming increasingly clear that the best use of forests is to protect the wildlife that the tourism industry depends upon; protect the water supplies that our communities rely on and store the carbon that is driving climate breakdown. Polling in the electorates of Ballina and Lismore show that 90% of people agree. Yet the new IFOA directly undermines all of these imperatives, just to meet unrealistic wood supplies for a few short years.

Destroying what is left of the ecological values of state forests and logging protected areas to meet wood supply is not the action of a responsible government. One of the recommendations in Ewan Waller's report into the RFA consultation was that the government conduct a review of the logging industry considering climate change, conservation, socio-economic issues and support for the logging industry. This is the least the community can expect.

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