



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

**First Name\*:** Fiona

**Last Name\*:** McCormick

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**Postcode\*:** [REDACTED]

**Country\*:** Australia

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

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

**Other, please specify:**

**Organisation name:** I am involved in Landcare, Northern Rivers Guardians, and the local bushwalking group. I am making this submission as an Individual

**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 please

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

Yes



Have you previously engaged with the EPA on forestry issues? Regarding a Private Forestry Agreement at Limpinwood

**Make a submission – Form**

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

All of it. It is a step backward for environmental protection

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?

I see no positive outcomes for environmental values and certainly none for the production of sustainable timber

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?

Here is the body of my submission:

Please accept this as my personal submission to the Review of the Draft Coastal IFOA



I understand the regional forestry agreements are re-evaluated every few years and that the NSW Government is calling for submissions to the Review of the Draft Coastal Integrated Forestry Approvals (IFOAs)

Firstly I wish to point out that it is my opinion, based on some 45 years' experience in bush regeneration and landcare, that the Regional Forest Agreements have failed to protect either the environment or the forestry industry. In fact appears from the ridiculously small timber sizes mentioned in the Review that the forestry industry is now (almost literally) clutching at straws. There is, for instance, evidence that Government agencies have intentionally inflated current timber commitments from NE NSW in order to justify removing existing environmental protections – including allowing the logging of old growth forest in the CAR reserve system. My understanding is that in 2014 the NSW Government spent \$8.55 million in order to buy back 50,000m<sup>3</sup> p.a of high quality sawlogs as this was deemed to be necessary in order to reduce cutting rates to a long term sustainable level, yet it is now proposing to *increase* cutting rates. Will this money be recouped from the companies which benefited? The economy of my local town of Kyogle was once based on forestry and it has been transitioning out of this industry for over a decade as foresters are well aware that high quality sawlogs are becoming too hard to find, and that the proposal to cut 269,000m<sup>3</sup> from NE NSW is simply unsustainable. They actually want no part of an industry that damages the environment, and foresters I have spoken to are extremely concerned about the impact of bell miner induced dieback in areas where there has been clear felling and subsequent weed invasion. Thus my first point is that the industry does not actually want a reduction in environmental protections.

The IFOA also completely fails to recognise the importance of habitat and the non-timber values of forests. Quite apart from habitat for our iconic wildlife, we need to consider the value of forests as carbon sinks, water catchment and purification structures and microclimate modifiers. Again, I have been working on and with the land for decades and have seen first-hand how vital a good forest is for the health and viability of adjacent farmland. As existing areas under forest reduce, so too will our water quality and volume and volume of humus reduce, with predictably dire consequences for those trying to feed us. The Threatened Species Expert Panel Review pointed out that “No further loss or impact on the retained riparian areas that have been protected to date under the existing rule set should be occur.... 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 area”

When it comes to habitat protection, it is the older trees (>120 years old) which start to have the hollows necessary for nesting and shelter, and even older trees (>200 years old) before there are large enough hollows for owls, larger birds such as cockatoos and gliders.



Koalas tend to be found with higher frequency once the diameter of the tree is >800mm, yet the new proposal approves trees with a diameter as low as 200mm as “retained koala trees”! Current habitat retention rules per hectare are for 5 hollow-bearing trees (where they exist) and one of the next largest trees as recruitment trees for each hollow-bearing tree. Natural forests have 13-27 hollow-bearing trees per hectare, so the existing rules are nowhere near ideal. The intent of the new IFOA is to require just the 5 hollow-bearing trees per hectare and no requirement for recruitment trees to replace the hollow-bearing trees as they age and die. In actual fact large old hollow-bearing trees are often piped (having hollow centres) hence not much use for the timber industry anyway, however it is the recruitment and feed trees which provide a high proportion of the larger high quality sawlogs. Unfortunately the EPA has been a toothless tiger in failing to prosecute where clear breaches have been identified under the existing protections.

In NE NSW 228 species (72%) of threatened plants will lose all protection and some 28 species (9%) will have reduced protection. Most of these species required either a 20m or 50m exclusion zone previously. I am also concerned about the removal of the requirement to survey for and apply protections to 22 threatened animals, such as the 20ha exclusion zone for the Brush-tailed Phascogale, the 8ha exclusion zone for the Squirrel Glider, the requirement to maintain 50m buffers around inhabited wetlands containing the Green and Gold Bellfrog, to retain 50m around dens and 15 mature feed trees within 100m of the Yellow Bellied Glider, and to retain 10 mature eucalypt feed trees per 2hs in compartment for the Swift Parrot, Regent Honeyeater and Black-chinned Honeyeater (for example). What is being proposed is to *NO LONGER REQUIRE SURVEYS*. Small though the protections were, at least the requirement to survey provided some hope for retention of habitat for species at risk of extinction. In fact distance between trees left in a coup becomes vital for smaller mammals such as gliders.

I could add more, however my main points are:

- existing protections have been inadequate for plants and creatures alike
- the proposed changes pose real risks for the viability of our forests and their denizens
- the timber industry has been costing the NSW taxpayer too much, I would rather this money were invested in rehabilitation of native forests
- we need to transition to timber plantations NOW
- native forests provide us with vital amenity in terms of carbon capture and storage, water filtration and micro (and macro) climate modification which is far more valuable than the tiny logs permissible under these changes



In summary I wish to oppose the draft IFOA changes and would dearly love the NSW Government to do away with Regional Forest Agreements as they have failed to deliver environmental protection or industry security.

I will be eagerly awaiting a response and monitoring your performance on these issues.

**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)?**

**These are simply not protections as I would understand a protection. Regarding landscape protection – logging is incompatible with this, operational scale – again these are not adequate to earn the descriptor “protection”. As for regional protections – as I have already explained, there is none!**

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

**In my opinion no. For the reasons outlined in item 3 above.**

**6. General comments**

**Please take the time to read my submission. I wrote it before I realised the intention was to use this Q and A format, however the short answer is that these changes reduce the already inadequate protections and the timber industry needs assistance to transition to plantation forestry ASAP. In my opinion the money spent on shoring up native forestry would best be invested in habitat regeneration and bushland rehabilitation. The bell miner associated dieback is one symptom of how sick our forests are becoming due to decades of rapacious harvesting. As a land owner myself I would be ashamed if my husbandry showed such poor outcomes.**