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Responded At: Jun 25, 2018 21:26:26 pm

Last Seen: Jun 25, 2018 21:26:26 pm

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Q1. First name	Hugh
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Q3. Phone	██████████
Q4. Mobile	not answered
Q5. Email	not answered
Q6. Postcode	████
Q7. Country	Australia
Q8. Stakeholder type	Individual
Q9. Stakeholder type - Other	not answered
Q10. Stakeholder type - Staff	not answered
Q11. Organisation name	not answered
Q12. What is your preferred method of contact?	Email
Q13. Would you like to receive further information and updates on IFOA and forestry matters?	Yes
Q14. Can the EPA make your submission public?	Yes
Q15. Have you previously engaged with the EPA on forestry issues?	No

Q16. What parts of the draft Coastal IFOA are most important to you? Why?

The forests are important to me. Timber for building is important for me. Unfortunately, this document indicates an abject failure to manage the forests for either environmental well-being or sustainable timber production. The forests have been so degraded by current mis-management that unless they are fully protected now for environmental reason including carbon sequestration, and the timber industry moved over to plantations, this document will stand as a blueprint for the destruction of both the forest ecosystem and the timber industry.

Q17. 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 of it.

Q18. 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 document is a complete failure with regard to returning the forests to sustainable timber production. North coast forests have been over-cut for at least 40 years. Without a radical re-think of forestry activities it appears that sustainability will never be achieved again. And the outlook for environmental values is even more dismal. I don't believe you can be serious in asking whether this document might have negative outcomes - of course it will.

Q19. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?

There is nothing in this draft IFOA which leads me to believe there are any effective permanent environmental protections. Halving of buffer zones along stream; removal of the need for pre-logging surveys; allowing clear-felling - all of these are the opposite of what might be expected if the IFOA was serious about permanent environmental protections.

Q20. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?

The draft Coastal IFOA as it stands will be effective in managing to minimize environmental values and appears designed to maximise short-term timber production and continue to down grade any chance of having a sustainable timber industry on the NSW north coast. Clear felling, as advocated in the draft IFOA, is not consistent with sustainable productive forests.

Q21. General comments

Please accept this as my Submission to the Review of the Draft Coastal IFOA. The Integrated Forestry Operations Approval (IFOA) was drawn up almost 20 years ago using figures of timber availability which were grossly inflated. The timber was not there then and is not there now. Yes, timber in our State Forests is a renewable resource but has been over-logged for more than a generation. This over-allocation has led to increasing pressure on our forests to supply timber faster than it can be replaced. This recently announced revision of the IFOA is a clear example of the pressure to supply more timber than is available. If it were not so, there would be no need to halve the exclusion zone designed to protect our fresh water supplies; to reduce or remove altogether the requirement to retain old-growth hollow-bearing trees for the arboreal mammals and birds which require this habitat; to minimise the requirement for pre-logging surveys to protect koala and glider feed-trees; to open protected areas such as rainforest for logging. I urge you to not proceed with these alarming and short-sighted changes to the IFOA. The IFOA needs a complete re-think and a need to: 1. recognise the non-timber benefits of the forests you manage: the clean air and water and, even more importantly, their role in carbon sequestration. Also recognise the tourism and recreation potential which is destroyed for a generation by the clear-fell logging allowed under this revision of the IFOA. 2. plan ahead for the cessation of timber cutting in our remaining native forests. Our native forests are reaching such a degraded state that they are barely able to provide habitat for native animals. Meanwhile conditions are encouraging the death of remnant trees through vectors such as bell-miner associated die-back. The evidence is in, that logging practices are opening the forest to lantana understorey which helps the proliferation of bell-miners and their protection of their lerp food-source. The lerps breed unchecked and suck the life sap out of the few trees left following logging. This leads to collapse of the forest structure and encourages the current thinking - "if it is going to die anyway, why not log it first?" This encourages the clear-fall mind-set. Before the RFAs expire, it is time to actively plan for the industry to cease native forest logging and transfer these public lands into protected areas. 3. stop increasing logging intensity and legalising clearfell logging along the North Coast of NSW. This plan as outlined in the draft IFOA is indicative of the failure of the previous one. The timber was not there originally and will only be available if you remove wildlife corridors and buffers, reduce stream-bank buffers and increase logging intensity till you reach clear-fall where the structure of the forest is annihilated. This draft IFOA, as it stands, is a clear demonstration of failure to manage the forest sustainably and to manage the forests for the public good. Our forests are needed to maintain environmental wellbeing; to provide scope for public recreation; and, most importantly, they must be maintained to provide protection and enhancement of the forest for the plants and animals which rely upon it for survival. Thank you for the opportunity to make comments. This issue is of enormous interest to me and I will watch with interest how you modify the draft to cater for comments such as mine. Yours sincerely, Hugh RW Nicholson -- [REDACTED] NSW

[REDACTED] AUSTRALIA [REDACTED]

Q22. Attach your supporting documents (Document 1) not answered

Q23. Attach your supporting documents (Document 2) not answered

Q24. Attach your supporting documents (Document 3) not answered