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RE: Thr remake of the coastal IFOAs

I am a veterinarian with a special interest in koalas and hence an interest in forests and forest management.

I commend the EPA for responding to concerns with present IFOAs and the Threatened Species Licence (TSL)

I cautiously support the proposal to use landscape-based protections for threatened species and ecological communities although until I see the lines on the maps it is hard to say if this is going to be enough to save the koala populations in State Forests. State forests are very important for the viability of the coastal koala populations and it is crucial they are actively managed for the recovery of koalas in the coastal forests of NSW. Unfortunately koalas have become increasingly rare in State Forests in the last two decades due to the continual removal of their preferred food trees.

The discussion paper does not mention how koala populations are going to be protected in the coast IFOAs remake.

I offer the following comments on the discussion paper for the Remake of the Coast IFOAs:

- Increasing the harvest exclusion areas to protect important habitat areas and enhance connectivity with other habitat areas is a positive step and so is the provision for habitat clumps in harvest areas.
- However, these exclusion areas will have to be ecologically generous in quality and quantity because what is not protected in these exclusion zones will be gone.
- The increase in ecological exclusion areas will be offset with increased intensity of logging in harvest areas and logging on steep slopes which will not be sustainable.
- The proposal is for no pre-logging surveys and no (or few) species-specific prescriptions, lessening of limits on clear-felling and worst of all, logging on protected steep slopes. Steep slopes are a refuge for threatened species because they have been protected from logging and whilst cables may help the erosion issue, the canopy will be opened causing moist gullies to dry out. It was recognised by Reed and Lunney (1990), in one of the first ecological studies of koalas in NSW, that the koala had lost most of its primary habitat from clearing for agriculture and urban development and it had retreated to the headwaters of creeks, the steepness of the slopes and inaccessibility of the terrain giving protection to these koalas.
- I am therefore vehemently opposed to the logging of previously protected steep slopes.

- I believe pre-logging surveys and species-specific prescriptions should be retained and improved where necessary.. Species-specific prescriptions should still be applied within harvesting zones until the measurable environmental outcomes from the exclusion zones are assessed. Instead of putting threatened species surveys in the too hard basket, FCNSW should look at new 21st century methodologies e.g. a small drone with a camera or a well trained dog.
- Landscape-based protection is complex and I think should be trialled in a few areas and environmental outcomes measured before it is adopted
- The EPA is supposed to be protecting the environment, not industry. The proposed coast IFOAs read like a timber industry wish list. The timber industry has always grumbled about restrictions and protocols as it struggles with the concept of sustainability.
- I also think it is outrageous and undemocratic that third parties cannot report breaches of the IFOAs- the EPA should welcome assistance from the public and State Forests are public land.
- Prevention of breaches by logging contractors should be the priority so it is good that logging contractors will have to have minimal levels of competency but responsibility for breaches should still be with FCNSW and the EPA must wield a bigger stick with penalties that hurt.
- Fire trails in harvest exclusion areas will not be maintained- this could potentially put landholders in the area and fire fighters at risk.
- Weed and pest control will not be done which will lead to degradation of the land and habitat
- If these management activities are not covered in the IFOAs, who will be responsible for the care of the forest?
- What does the Forest Practices Authority of Tasmania know about the ecology of the koala and its vulnerability to disturbance?

Thank you for the opportunity to comment on the coast IFOAs remake.

Yours sincerely

Vanessa Standing