



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

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Phone:

Mobile*: [REDACTED]

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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:

N/A

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

YES

Have you previously engaged with the EPA on forestry issues? YES



39 Howard Street
Coffs Harbour NSW 2450

10 July 2018

RE: Submission to the Coastal Integrated Forestry Operations Approval (IFOA)

Dear Sir/Madam,

I write regarding the proposed Coastal Integrated Forestry Operations Approval (IFOA) which has been on public exhibition for the last 8 weeks. I strongly reject the position taken by the NSW government, in that, the IFOA remake is incompatible with sustainable forest management and will have long term negative impacts on our ecology, water and landscapes. It should be scrapped and replaced with an environmentally sound and science based policy that reflects the broader communities desire to see its public forests managed for all - not just a select few.

Old Growth Forest & large diameter trees

Changes to the IFOA regarding old growth forest and how they're being mapped away is of major concern. The Natural Resource Commission was given the unenviable job of providing supplementary advice on whether the NSW government could remap and rezone old growth forest (and rainforest) to offset the impact to known wood supply shortages. To do this they are using the existing Private Native Forest (PNF) protocols.

The most recent scientific reference associated with the PNF protocols is 20 years old, with most others more than 25 years*. Alarmingly, all the advances and knowledge and importance of large diameter trees and old growth forest for the last 2 or 3 decades has been completely ignored. By way of example, the loss or depletion across the landscape of old-growth forest, and, in particular, hollow-bearing trees, has been recognised as a key threat to fauna species diversity (NSW Scientific Committee 2006). There is a wealth of peer reviewed Australian papers that predict a very grim future for our wildlife if we continue to log large diameter trees – a small sample of the multitude of references starting to raise alarm bells on this matter is provided below:

- Manning et. al. (2013). *Hollow futures? Tree decline, lag effects and hollow-dependent species. Animal Conservation.*
- Treby et. al. (2014). Forest Conservation Policy Implementation Gaps: Consequences for the Management of Hollow-bearing Trees in Australia. *Conservation and Society* 12(1): 16-26.
- Lindenmayer et. al. (2012). Interacting Factors Driving a Major Loss of Large Trees with Cavities in a Forest Ecosystem. *Plos One*

The IFOA remake opens up to the industry trees with a DBH of up to 140 cm. This is a major shift in forest policy which will have a significant impact on the environment for decades if not centuries.

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The primary document to be used for the re-mapping of old growth forest across state forests is the Private Native Forestry protocols on private property (PNF protocols). Under these protocols only areas > 5 ha will be considered. Accordingly, any area of forest that has large old trees that is less than the size of 5 football fields is fair game for intensive industrial logging under the new IFOA.

Pilot studies as part of trial reassessments mapped away 78 percent of old growth forest and in six of the 13 sites reviewed, the reassessment found no areas of old growth forest according to the PNF protocol. Translate that across all our public forests and we have a massive environmental problem considering there is so few large diameter trees remaining, let alone 'patches' that are considered large enough in area to be considered old growth forest (> 10 ha in area). For example, a recent paper on old growth in the Coffs Harbour LGA showed that there was less than 1% on candidate old growth across all private forested land. Similarly, there remained less than 3% of freehold forest which was considered High Value Arboreal Habitat where patch sizes were smaller (1 - 10 ha) (Cotsell *et. al.* 2016).

To illustrate graphically the size range of trees that can be removed I have attached two images of mature trees that fall below the 140 cm Diameter at Breast Height (DBH) threshold. These would be subject to logging under the new IFOA remake, see Plates 1 & 2. Logging trees of this size and age should be considered nothing less than environmental vandalism given there is so little already remaining in our state forests and across the broader landscape.

In conclusion, there remains very little old growth or high value arboreal habitat across the entire east coast of NSW and what remains requires the highest level of protection. The broader landscape, including our publicly owned state forests requires supplementation by management regimes that promote the protection and recruitment of old trees, not a policy to destroy them.

Koalas

Very few new reserves have been created for koalas and those that have include virtually no koala records according to the NSW governments own Bionet database. Few koalas will be offered protection and ignores the largest populations of koalas in north coastal plain forests which have been left largely unprotected. The adoption of the Great Koala National Park would be the first step if the NSW government was to gain some credibility.

Significant weakening of environmental standards

Given all the evidence how can the government possibly they are strengthening environmental standards for our public forests? That claim is just a nonsense when the NSW government is proposing to strip away virtually all the threatened species protocols and introduce industrial logging, with patch sizes of between 50-80 ha across 140,000 ha of North Coast forest.

Breaches



We all know what an appalling job the Environmental Protection Authority (EPA) did in prosecuting Forest Corp for blatant and persistent breaches under the existing IFOAs. Sorry, just because you've moved those responsibilities to another NSW government department (Local Land Services) should we be expecting a different result? Without question, an independent body outside of the NSW government should be overseeing compliance. However, if the IFOA gets through in its current form, they'll be little point in having a regulatory body as they'll be nothing left to protect in our state forests.

Lack of consultation

The NSW government has held closed meetings to develop the IFOA remake. Alternatively there have been large gatherings set up by conservation groups outraged by what's proposed under the new Coastal IFOA. This has been necessary because the government has put out the IFOA remake without a single public or stakeholder meeting during the consultation period to discuss and receive feedback on the proposed changes.

Conclusion

The NSW government suggests the changes to the IFOAs will strike a balance between the environment and the timber industry. These are weasel words used to placate the public in to believing the government is actually responsibly and sustainably managing our forests. In reality our forests are being further threatened under these new proposed IFOA changes. The areas between Port Macquarie and Grafton in particular are proposed for the most intensive logging regimes. This means virtual clearing felling of areas between 50 - 80 hectares, compared to the current limits of 0.25 ha.

The next state election is rapidly approaching and the Nationals will be out of office across Port Macquarie, Oxley and Cowper not to mention other electorates if this ill thought out forest policy is adopted. I hope the NSW government is preparing itself for the forest wars that will eventuate, similar to those of the 80's and 90's, if this policy goes ahead.

Yours faithfully

Nigel Cotsell

References

Cotsell, N., Fisher, M., Scotts, D., Cameron, M. (2016). *Identifying High Value Arboreal Habitat in forested areas using high resolution digital imagery*. Pacific Conservation Biology, 22, 1-10.

Department of Environment and Climate Change NSW (2007). *Protocol for re-evaluating old-growth forest on private property*. Department of Environment and Climate Change, NSW, Sydney.



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Manning et. al. (2013). *Hollow futures? Tree decline, lag effects and hollow-dependent species*. *Animal Conservation*.

Treby et. al. (2014). *Forest Conservation Policy Implementation Gaps: Consequences for the Management of Hollow-bearing Trees in Australia*. *Conservation and Society* 12(1): 16-26.



Plate 1. Grey Ironbark (*Eucalyptus siderophloia*) 136cm Diameter at Breast Height (Not protected under the IFOA remake)

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Plate 2. Blackbutt (*Eucalyptus pilularis*) 138 cm Diameter at Breast Height (Not protected under the IFOA remake)