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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?	Mobile
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?

Tree retention ,logging rates and regeneration. These documents will not ensure that there is age, species and genetic diversity left in coops after logging. this will be to the detriment of our unique fauna, insects and beekeepers and ultimately the 35 industries that are dependent on honeybees for pollination.

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?

Retention of tree clumps and habitat clumps. plus the public display of the GPS coordinates of each tree to be permanently retained.

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?

Logging rates, logging frequency, reducing riparian buffer zones, burning regimes. Lack of enforcement of ensuring the species mix is retained after logging and into the future. No mention of age diversity, genetic diversity, middle storey health or lower storey health.

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)?

Tree clumps too small. Will not be policed or enforced.

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

No. With these documents the forests of NSW will lose their diversity. I could not find the benchmarks for species mix for each forest area that Forests NSW is to maintain. Without species, age and genetic diversity in all three storeys in the forests they have lost their environmental value and will not maintain our unique fauna and insects. The logging regime is too heavy to maintain a sustainable timber industry.

Q21. General comments

Beekeepers are a major user of the forests of NSW and had no input on these documents. There are 35 industries that rely on honeybee pollination. Beekeepers need access to NSW mixed species multi aged forests to maintain healthy bees for pollination and also to recover after pollination. Beekeepers are as dependent on NSW forests as Forests NSW Corporation yet we are never consulted or included in policy.

Q22. Attach your supporting documents (Document 1)

[Redacted]

Q23. Attach your supporting documents (Document 2)

[Redacted]

Q24. Attach your supporting documents (Document 3)

not answered

IOFA Submission
Stephen Targett
Jun 2018

NSW has unique diverse forests. These are a public asset and should be maintained in a manner to keep their unique diversity. This IOFA does not mention many specifics that make our forests forests:

- Age diversity
- Middle storey
- Lower storey
- Species diversity

Forests should be comparable at completion of this IOFA as the reference species mix. (I could not find the references for the species mix to be maintained) For the Eden forest area it should be as per the forest surveys carried out prior to the approvals for logging for the chip mill. These surveys were carried out in the late 1960's and early 70's. Eden forests have changed since that time as a result of the logging. There is a lot more silver top ash and a lot less woollybutt, ironbark species and stringybark species in the Eden forest area now. In the Batemans bay areas the forests have become spotted gum forests and grey ironbarks that were a significant part of the species mix are now very much in the minority. This is all because the regeneration model/techniques are flawed.

The middle storey and lower storey are important for pollen for insects including native bees and our marsupials such as gliders as the pollen is high in protein. Logging practices must be such that the middle story and lower storey must have time to fully recover from one forestry operation (logging or burning) prior to the next event – ideally at least ten years. That is if a coupe is selectively harvested then it cannot be selectively harvested for at least 10 years. Thinning operations cannot be conducted for at least 10 years after harvesting or burning.

The forest species mix needs to be maintained to provide forest diversity, this is required for the insects, fauna and also for beekeepers. Each species of tree only flowers every few years (up to 7 years) and each tree species flowers at different times of the year. This provides nectar and pollen for our unique insects and forest fauna. Glider and possum sap trees are only required when there are no trees or middle story flowering.

The burning regime is removing the species mix of the forests. Some different plant species survive a spring burn than the plants that survive an autumn burn. Forests NSW tend to only burn in autumn. I am aware it is hard to do spring burns but there are years they can and should be done.

The tree basal area to remain after harvesting is too small to provide age, genetic and species diversity for the area. Once an old growth area is logged it then becomes a

regrowth area so it can be harvested again as regrowth areas have less basal area remaining.

I am confused. In the Forestry NSW report to parliament in 2017 it was reported that less than 1% of the state forests were harvested. Given that approx 50% of state forests can be harvested (not including crown land) this equates to a 50 year rotation for each harvested area. Beekeepers, native fauna and forests can thrive with a 50 year rotation. Why log so hard if Forests NSW is logging less than 1%? A 50 year rotation will give a large volume of high quality sawlogs which is the primary aim of Forests NSW. Given the Eden area was only heavily logged since the early 1970's there should be a large volume of high quality saw logs currently available from this area.

Recording of all trees to be retained (tree clumps, hollow trees, giant trees, habitat clumps etc) should be all on GPS and be publicly available.

The forests of NSW are a public resource. Therefore the Forestry NSW Corporation report to parliament should include timber figures as well as financial figures. That way the public can assess whether we are getting a return on our public resource and whether Forests NSW is meeting their primary objective of producing High quality large and high quality small sawlogs.

Assuming Forests NSW harvested the timber that is noted in this IOFA in 2016/2017. **NOTE:** These timber figures do not include timber from river redgum forests or cypress forests. (do not know if cypress forests figures are in hardwood or softwood section). From the coastal Forests in this IOFA a minimum of 428,500 cubic metres of quality sawlogs plus 345,000 cubic metres of pulpwood was harvested. The Forestry NSW Corporation report to Parliament 31 Oct 2017 announced a total income of \$109 million for the hardwood division. This income equates to a price of less than \$14.00 per cubic metre for hardwood. Given that all native hardwoods less cypress weigh much more than one ton per cubic metre Forests NSW is selling our hardwood timber for less than \$12.00 per ton.

Prices at this level will not encourage investment in native plantations or private native forestry.

Who is funding the training of LLS staff for managing of Private Forest applications and enforcements etc? This is a cost shifting exercise by Forests NSW.

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Beekeepers have used the forests of NSW for generations. Beekeepers are a passive user of the forests. Beekeepers are a major user of the forest and have not been invited to provide input to the writing of these documents. Beekeepers have noticed a big change in the forests over generations. The species mix has changed and the size of trees has reduced dramatically. The current dimensions for high quality sawlogs is for an approx 30 year old tree in most forests.

Beekeepers and our unique fauna require our forests to be retained with the original species diversity as well as age diversity. Mature trees of each tree species have regular flowering times (time of year every few years) and provide reliable supplies of nectar and pollen. Small trees flower irregularly (at odd times of the year for the species) and flower over a much shorter time frame and provide a lot less pollen and nectar. The different species in the forests flower at different times and often in different years.

Under the current logging practices beekeepers have been able to harvest nectar from NSW state forests primarily due to the trees that have been left as riparian buffers along drainage lines and the trees on the steep slopes. The reducing of buffer zones on drainage lines and logging steep slopes will greatly reduce the honey harvest from NSW Forests and the financial viability of the beekeeping business. Logging on steep slopes should not be carried out. If logging on steep slopes is conducted then the riparian buffer zone on drainage lines below the steep slopes must be a minimum of 50m. The current buffer zones around Blowering dam where softwood steep slope logging is carried out are too small to stop sediment flowing into Blowering dam.

Access to mixed species mixed age forests is even more important for beekeepers than it was 20 years ago. 20 years ago over 40% of NSW honey crop was from paterson's curse. With the release of bio agents paterson's curse is no longer a viable honey prospect. Paterson's curse was also great for building bees prior to pollination and great for building bees up after a pollination event. This is no longer the case.

NSW produces approx 45% of Australia's honey crop. The national honey crop is worth \$45 million annually. Pollination by honeybees is valued between \$8 - \$12 **billion** annually. NSW beekeepers provide a large portion of that pollination. 99% of NSW pollination is in rural and regional NSW. There are 35 crops that rely on honeybee pollination. Two of the fastest growing industries being almonds and blueberries rely on honeybees for pollination. With almonds NO Bees = NO Nuts. To build strong hives for pollination beekeepers need access to healthy mixed species NSW forests. One or two trees of a species is not sufficient to build hives. Access to hundreds of trees of the one tree species are required to support one apiary. Beekeepers lease bee sites from Forests

NSW that are in grids of 1.5km square. Ideally those 100's of trees should be in that 1.5km square grid.

Beekeepers not only need to build their bees in NSW Forests prior to and after pollination events but also be able to honey harvest from these forests to remain a financially viable business. No beekeeping business can survive on pollination income alone. Pollination income is only part of the business income.

It is very frustrating when a beekeeper has paid his annual site fee to Forests NSW for several years waiting for a tree species to bud and then flower. Then to be informed by Forests NSW that he cannot use the leased site as logging will take place during flowering. In most cases the tree has been budded for at least 9 months prior to flowering and Forests NSW should know from this when the tree will flower. For the benefit of beekeepers and our unique fauna Forests NSW should delay logging until after the flowering event. Sometimes I wonder if Forests NSW know what is going on in their forests from a flora point of view.

When comparing the value of NSW Forestry against beekeeping for the NSW economy, it should only be the value of the coastal hardwood industries. Do not include the river redgum and cypress pine values. Beekeepers do not use the trees in softwood forests and the cypress forests. Beekeepers do use the river redgum forests every few years when there is a flowering event. The river redgum forests tend to be only used when the river redgum flowers and thus are used a lot less than the mixed species coastal forests.

In Victoria beekeeping has been deemed '**An Essential Industry**'. This is due to the recognized importance of honeybees for state and regional development and also food security. The forestry body in Victoria looks forward 200 years. Logging near leased bee sites is at a lower rate (I believe only 1 in 3 trees can be taken and then not logged again for years) than the logged areas not near leased bee sites. This is Sustainable Forestry and beekeepers sharing the forests for the benefit of all Victorians.

NSW Beekeepers do not want to stop logging. However these conditions and protocols will NOT ensure mixed species and mixed aged forests will remain after forestry operations that are suitable for beekeepers. A lighter logging regime with a longer time between forestry operation on each coop/compartement will provide a better opportunity for high quality sawlogs. As well as provide a healthy middle and lower storey for the benefit of beekeepers and our unique fauna.

Forestry NSW and beekeepers can share the forests of NSW for the benefit of all NSW citizens by regional economic development and food security. For this to happen beekeepers have to be included in Forestry Operations and decision making processes.