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**To:** [\\_ALL-EPA-Forestry-IFOARemake](#)  
**Subject:** Comments on "Remake of the Coastal Integrated Forestry Operations Approvals"  
**Date:** Sunday, 6 April 2014 3:36:50 PM

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Dear IFOA

Below are some of my comments on the above Discussion Paper:

Overall the proposed changes appear to take the NSW Forestry Legislation back to the 1980's and 1990's so far as the protection of the environment and threatened species and communities are concerned. I find it shameful that in a supposed enlightened age, governments and government departments are happy to step backwards if they find it politically prudent to do so, or if they are told to do so. I do not consider that a lack of enforcement to date is a reason for removing the regulation to be enforced. If regulations protecting the environment and threatened species and communities are difficult to understand, then surely more training should be given to the relevant logging operators to give them further understanding into not only the regulations but why they were written in the first place.

Advances in technology and recent innovations are to be applauded when used appropriately, that is, in partnership with the most recent data on native animal and plant species and communities. However if advanced GIS mapping is used as a stand-alone resource it will undoubtedly miss important small areas of threatened species habitat and threatened community habitat.

According to Table 2 the IFOA considers that the current logging regime is sustainable, yet it is common knowledge that many of NSW State Forests are in serious decline, and as well, quotas are becoming more and more difficult to meet. I would consider that the steep area logging trial (p. 31 of the discussion paper) is an attempt to increase harvesting in order to try and meet the current quotas.

Also in Table 2 the current IFOAs are described as unenforceable, probably because they have been unenforced. There have been many attempts by communities to point out the lack of adherence to the regulations, the lack of enforcement, and the lack of punitive measures when proven that the regulations have clearly been breached. To consider that the removal of the regulations due to the historic lack of enforcement I find ludicrous. It demonstrates that there is no concern by the IFOA for the protection of sensitive or special environmental features, including threatened species and communities.

The question of post-harvest burning is an enigma to me. Why would foresters want to post-harvest burn? Surely it would make more common sense that the trash is left to rot and become part of the forest floor. I can understand that loggers would want a pre-harvest burn in order to make it easier to move around. This would remove the understorey, which would come back so long as the fire frequency was appropriate for the seeds to germinate and reach maturity prior to the next burn. If the immature plants were burnt, then this would give plenty of room for weed species to move in. I can also see that some species could benefit from burning, such as *Gahnia* species, but again the fire frequency would need to be appropriate for them to continue to colonise the logging dumps.

What information does the IFOA have on appropriate fire frequencies for the whole of the coastal NSW forests, which will encourage native species to colonise

logging dumps and deter weeds? In particular, further down Table 2 it mentions that the IFOA does not intend to regulate weed control. What kind of weed monitoring will take place during and after logging activities?

There is a large focus in the Discussion Paper regarding 'general landscape protection' as opposed to specific surveys for threatened species and communities. How does the IFOA identify small areas that contain sensitive environmental areas such as riparian zones for small streams, threatened species or communities? Is there data available that can identify these areas, and other possible areas of similar habitat? How does the IFOA propose to identify these areas BEFORE they are logged or otherwise destroyed?

The TEC mapping project is described as having been commenced. How far has this work progressed, and if the answer is 'not very far' then why will it be used to make important logging decisions without having any sound basis for the decision (apart from political reasons of course!). Obviously if this is the case the IFOA cannot claim to be making any logging decisions on the basis of any scientifically sound data.

The new LIDAR technology has obvious benefits for mapping small watercourses prior to the machinery going to the site. I fail to see why this technology can be used as an excuse to log very steep slopes (ie >30degrees). Particularly in subtropical areas this is asking for disastrous landslips and other serious soil erosion issues. My opinion is that nothing over 25 degrees steepness on public or private land should ever be logged, because of erosion issues.

It is a very sad day when the government panders so easily to industry lobby groups and obviously cares so little for our increasingly fragile environment, which they are happy to pound harder and harder, I suppose until extinction occurs. It is particularly sad to see such hard-won protections being removed by the score, and this makes a mockery of democracy, since many, many people are very sad about this.

Kind Regards

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