



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

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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	<b>Individual</b>	Staff

**Other, please specify:**

**Organisation name:**

**What is you preferred contact method (circle):** Mobile, **Email** or phone?

**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

**Have you previously engaged with the EPA on forestry issues? **Yes****



### Make a submission – Form

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

##### ***Impacts, economic and natural systems***

On the IFOA website, the stated aims are admirable (“... provide clarity, transparency and enforceability as well as better balancing environmental outcomes and timber production”. Unfortunately for the NSW South Coast region, the implemented results will have many more adverse than positive impacts.

Logging has been a declining industry in New South Wales for many years and this decline will continue. The South Coast is a now region where our future economic and jobs growth is inextricable tied to new business models, especially the potential for an international nature based tourism industry. The IFOA proposals as they currently stand pose a very real threat to that eco-tourism growth industry.

#### 2. 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?

The overall impacts will be adverse.

#### 3. 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 Government’s own Natural Resources Commission (NRC) Report identifies that the IFOA proposals are not able to satisfy the Governments twin criteria of protecting environmental values as well as wood supply targets (Quote:” ..it is not possible to meet Governments commitments around both environmental values and wood supply”)

- a. Clearly they are designed to fulfill the short term goal of meeting wood supply, consequentially devaluing the environmental protection goal. In economic terms, this is a well-worn and well known downhill road to longer term problems for the natural environment.

The NRC further identifies that the proposed increase in logging intensity will occur at the expense of the environment. (Quote: “. the intensive harvesting zones are being formally introduced to prop up an unsustainable wood supply arrangement at the expense of the environment”)

- b. For us in the South Coast region, this is analogous to our local farmers feeding their cattle, this year, most of their next year’s grain supply. Over time it creates increasing problems as they in effect consume their own potential capital for future growth.



- c. This is the problem with the IFOA proposals. They will increase logging in our area by at least 50% over current levels, levels which we already know are too high and are already causing damage to our natural areas. The ongoing damage will not only cause irreparable harm to these pristine areas but also, consequentially, to our emerging eco-tourism market. No one wants to travel a long distance to simply see intensively logged forestry.

The NRC sums up the inescapable impact of the proposals as follows: *"...it must be clearly understood that these proposed intensive harvesting practices are effectively clear felling diverse native forest to replace with even age native plantations in a deliberate manner"*.

- d. The longer term impact of the IFOA proposals will be to convert most remaining iconic native forest into what are effectively managed plantations. These sorts of areas have little or no appeal to the local, national and international eco-tourism and walking market place. The iconic native forest are the key to unlocking such markets, which is precisely the reason why areas such as Tasmania and New Zealand have been so successful in this field. .

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

Economically, both the NRC and many ecologists seem to have reached consensus on the impacts which the IFOA proposals will have. The proposal will result in the slow but certain collapse of our native natural forest systems and many of the species of iconic native animals which depend upon those systems.

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

No. See comments above

**6. General comments**

Commercially, the long term negative economic consequences will far outweigh the short term ability to meet wood supply targets.

The NSW State Government has this month outlined plans to spend \$50 million on building new walking tracks in natural areas, including in the South Coast. These investments are an attempt to capture some of the booming international walking and eco-tourism market. The impact of the IFOA proposals will be to dramatically undermine this potential new market, which depends largely for its success on the social media network of referrals between existing participants.



Recent NSW Government announcements regarding land clearing and feral wild stock horse protection in some National Parks have already quickly spread across these communities and networks. The IFOA proposals will serve to further undermine the NSW position.