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Q7. <b>Country</b>	not answered
Q8. <b>Stakeholder type</b>	Environment group
Q9. <b>Stakeholder type - Other</b>	not answered
Q10. <b>Stakeholder type - Staff</b>	not answered
Q11. <b>Organisation name</b>	Birdlife Northern NSW
Q12. <b>What is your preferred method of contact?</b>	Email
Q13. <b>Would you like to receive further information and updates on IFOA and forestry matters?</b>	Yes
Q14. <b>Can the EPA make your submission public?</b>	Yes
Q15. <b>Have you previously engaged with the EPA on forestry issues?</b>	No
Q16. <b>What parts of the draft Coastal IFOA are most important to you? Why?</b>	not answered
Q17. <b>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?</b>	not answered

**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?**

not answered

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**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)?**

not answered

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

not answered

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**Q21. General comments**

Our comments are in the attached file.

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**Q22. Attach your supporting documents (Document 1)**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Q23. Attach your supporting documents (Document 2)**

not answered

**Q24. Attach your supporting documents (Document 3)**

not answered



## **Submission by Birdlife Northern NSW on the Remake of the Coastal Integrated Forestry Operations Agreement**

We are writing this submission on behalf of Birdlife Northern NSW, a branch of Birdlife Australia. Birdlife Australia is the nation's largest bird conservation organisation. It has over 110,000 members, volunteers and supporters. Currently, many Australian bird species are in decline, with many endangered and critically endangered. In fact there are now 20 species that Birdlife Australia have said are at imminent risk of extinction. 60 are endangered, 68 vulnerable and 63 near threatened. This deplorable situation should result in stricter protection for their habitats with well-funded and effective recovery plans. In fact, the NSW state government is already undoing decades of environmental protection and with this new forestry agreement is increasing the pressure on habitats in our native, publicly owned state forests. If this IOFA agreement goes ahead unchanged, it will contradict the federal Threatened Species Strategy and species recovery plans.

The first objective of this agreement is to reduce costs. This sums up the government's approach. There is no consideration given to reducing the timber supply contracts, even though the NSW Natural Resource Commission reported that "it was not possible to meet the NSW Government's commitments around both environmental values and wood supply under the expected cumulative impact of the agreed and recommended settings" ([www.nrc.nsw.gov.au/iofa](http://www.nrc.nsw.gov.au/iofa)). And while the NSW government consulted an expert committee, it did not accept all its recommendations and ignored dissenting opinions. The government adopted recommendations only "where appropriate" and conceded that "not all settings and issues could be acceptably resolved" (Remake of the Coastal IOFA Final Report, Threatened Species Expert Panel Review", page 9). Even those who agreed with some of the recommendations had reservations about others, especially about future and baseline monitoring. And many wanted current protections (including around streams and current reserves) to remain in place.

We recognise that there are some positive aspects to this agreement. The retention of clumps is an improvement on single tree retention, though the clumps are small and would be exposed to more adverse environmental conditions and fragmented. Retention of giant trees is also an improvement, though trees of less than 140cm and, for certain species, 160cm would still be felled. Better identification of first order streams is also a positive, though a 5m buffer zone is inadequate. And this 5m rule would also extend to some streams that have a larger buffer now, reducing protection for these streams.

## Major Concerns with the IOFA

- Many of the Outcome statements in this draft are vaguely worded and therefore not measurable.
- The new “intensive harvesting zone” covers 140,000 hectares of coastal forests between Taree and Grafton. This involves logging of 45 hectare coupes (up from 0.25 hectares previously). This formalises a widespread practice on the mid-north coast which has exploited a loophole in the old regulations and lead to clear-felling of much larger areas there. Even though clumps will be retained, this inevitably will lead to loss of habitat for our birds and other species.
- This zone contains Key Biodiversity Areas (KBAs). These areas have been nominated throughout the world and were proclaimed with this idea – that if you protect these areas you will protect most of the world’s biodiversity. For example, The Hastings Macleay KBA stretches from Stuarts Point to just south of the Camden Haven River on the mid-north coast of NSW. It was proclaimed by Birdlife Australia, as it has important habitats for the federally Critically Endangered Regent Honeyeater and Swift Parrot and the Endangered Australasian Bittern. There are two state Forests in this KBA – Queens Lake and Maria River. The Regent Honeyeater and Swift Parrot rely on the flowering of Swamp Mahogany and Forest Red Gum (amongst other eucalypts) in this KBA for their survival. The former bird is nomadic and the latter migratory and their movements and survival depend on the extent of flowering both here and in other areas of NSW. It is critical that their feed trees are protected everywhere, including in state forests, if they are not to become extinct. The national recovery plan for the Regent Honeyeater identifies all breeding and foraging habitats as critical for their survival and acknowledges that there is a 57% chance of its extinction in the next 20 years. And yet there is no longer a requirement in this agreement to protect eucalypt nectar trees.
- There is no longer a requirement to survey for most threatened species, relying on protection of their habitat instead. This approach is problematic, especially in the absence of scientific assessments of the adequacy of the current protected areas for threatened species. A wider baseline monitoring program also needs to be initiated before any more intensive harvesting takes place, otherwise any further monitoring data will lack rigour. One of the expert panel argued that this process is happening “ without any real monitoring having been undertaken in regard to the impact on those threatened species and ecosystems that this regulatory arrangement was set up to manage and protect” (Remake of the Coastal IOFA Final Report Threatened Species Expert Panel Review, page 31).
- The proposal to re-map previously protected old-growth forests is a retrograde step. State forests have been heavily and frequently logged under the old agreements. Any protected areas in the state forests are therefore important habitat and should continue to be protected. They contain hollow bearing trees and are important roosting and nest sites for birds, especially large forest owls and mammals such as gliders.
- The proposal to undertake alternate coupe logging at an interval of 5, 7 or 10 years will lead to a large areas of young forests with little ecological value.
- The Rufous Scrub-bird, endangered under the EPBC Act, occurs at low densities at high altitude in specialised forest habitat. Disturbance and fire will modify this habitat to render it unsuitable for this species. Pre-logging surveys for scrub-birds are essential in all high altitude (above 800m) state forests, with effective exclusion zones around known locations of the species being strictly enforced. Such areas should also receive special protection from fire.
- The management of weed invasion, especially lantana, in large disturbed coupes seems to have been ignored.

## Recommendations

- We urge the government to reconsider the new Coastal Integrated Forestry Operations Agreement. If acceptable environmental standards cannot be met with the current timber quota, then the quotas should be renegotiated.
- Any new agreement should protect areas currently protected, including but not restricted to, existing reserves, including old-growth forests and rainforests, current buffers around streams, all current exclusion zones for threatened species, all feeding trees for Regent Honeyeaters and Swift parrots and all occupied and potential habitat for Rufous Scrub-birds.
- Coupe sizes should not be as large as 45 hectares and logging frequency should not be less than 30 years. Many of the expert panel preferred larger coupe sizes that were logged less frequently, when presented with an either/or option. However, there were dissenting opinions that favoured small coupe sizes and longer logging intervals.
- Clumps should at least have the same retention rate (10%) in all forestry zones. As many recruitment trees and hollow bearing trees should be retained as is possible, in or out of clumps and should be in addition to other areas already excluded, such as wetlands, rocky outcrops and other already protected areas.
- All trees over 100cm in diameter should be retained. Large trees in our state forests are in short supply, due to the harvesting practices of the past few years and therefore should be a priority for protection.
- Surveys for threatened species prior to logging should still be considered. The adequacy of the reserve system should also be assessed and a well-resourced baseline monitoring should begin before any harvesting changes begin.

Plantations will not come online until 2028. Until this time, under current timber supply agreements, native forests will continue to be harvested to a very young age. These forest may take centuries to recover. This will have a big impact on threatened bird and other species and threaten their survival.

These changes seem to be driven by the need to increase timber supply and the principle of ecologically sustainable development has been jettisoned. The other ecosystem services that the forests provide have been ignored. These are - habitat for all plants and animals, especially threatened species, carbon capture, clean water and soil protection. If the intention is partly to supply timber to furnaces to produce electricity, it would be more sustainable to use solar and wind energy.

We disagree that the agreement as it currently stands strikes a balance between environmental values and timber supply. In the words of one member of the expert panel:-

“The intensive harvesting zones are being formally introduced to prop up an unsustainable wood supply arrangement at the expense of the environment”

Sue Proust  
Conservation Officer  
Birdlife NSW