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- 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?** Email
- 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?** Yes
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**
Expansion of logging in all "Coastal" forests - because I am totally against almost all logging of public forests.
- 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?**
None, because it is a plan that allows the timber industry open slather in our forests, worse than ever before, and will destroy most of our ecological and environmental values if not stopped.

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?

All of it, see the two previous answers.

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)?

"Multi-scale protection" is utter BS, as it will be an unmitigated disaster, allowing massive areas of clearfelling away from the eye of the public, and open up previously intact mature trees to the huge risk of intense and frequent wildfires. Only an intact mature forest can resist wildfires, especially in an era of intensified Climate Change.

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

No. Because the two are fundamentally incompatible. It's a ridiculous proposition.

Q21. General comments

See attached pdf.

Q22. Attach your supporting documents (Document 1)

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

Q23. Attach your supporting documents (Document 2)

not answered

Q24. Attach your supporting documents (Document 3)

not answered

Claire Bettington

[REDACTED]
[REDACTED] NSW [REDACTED]
[REDACTED]

SUBMISSION

Draft Coastal Integrated Forestry Operations Approvals (Coastal IFOA)

Statement:

The multiple aims of the Coastal IFOA are **fundamentally incompatible**. It is **IMPOSSIBLE** to simultaneously maintain environmental values and continue high volume wood supply. The Natural Resource Commission was handed a poison chalice and have done their best to come up with a policy which “suits everyone”, but in actual fact will not deliver the stated three aims of “maintaining environmental values, while ensuring wood supply and achieving social outcomes in NSW State Forests.” Therefore, the policy document, its intent, and the outcomes it seeks to achieve will be a failure from the outset, and **catastrophic** for our remaining forests, ecology and unique plants and animals.

The fact is, in this era of Climate Change, that we cannot afford “business as usual” in the forests; and what is being proposed is a massive escalation of the usual business, whereas in fact we need the reverse: we need to retain our remaining forests as carbon storage, and plant millions of hectares of new forests to act as carbon sinks. How else are we to meet our obligations to the Paris Agreement and NSW government commitments to Climate Change mitigation and emissions targets? Or are these agreements, stated aims and targets mere rhetoric while we continue to rape the environment for profit?

Therefore I urge you to *totally* rethink this policy, and drop the **draft Coastal IFOA** in its entirety.

Discussion:

NSW government commits to continuing large-scale forestry:

Over 5000 submissions were made to the public exhibition of the NSW RFAs review, almost all of them criticising the implementation and progress of the RFAs, and stating that they were a failed and broken policy. It is abundantly clear that the public has no confidence in the ability of the government and the forestry industry to manage logging, the forests and the environment in an **ecologically sustainable** manner. Indeed, the government has been remarkable lax in the administration of their own policy, inexplicably delaying the mandatory second and third 5-yearly RFA reviews for four and nine years respectively, and then combining them in a confusing and difficult to follow large report. What an utter shambles!

How on earth the public is supposed to approve of such maladministration, when there is a Government obligation to a fundamental duty of care to our unique forests and environment? The RFA system is broken; and yet the NSW government has stated repeatedly that they are going to commit themselves to another 20-year RFA, with the draft Coastal IFOA rules thrown in on top!

This is adding insult to injury, *when the public want an immediate halt to the destruction of our forests!*

Not only does the draft Coastal IFOA policy seek to expand forestry and logging operations in all NSW “Coastal” forests, but the policy also seeks to **intensify** those logging operations, with larger areas to be clear-felled, more

often, and by larger machinery; the policy also seeks to **reduce** buffers around ecologically important features such as streams, habitat trees, large old growth trees, and Koala food trees.

How on earth can this be considered to be any of the following:

- (a) ecologically sustainable;
- (b) good for the forests, soils, water catchments, plants and animals;
- (c) good for tourism;
- (d) good for Climate Change?

Indeed, the only thing it *IS* good for is the private profits of companies like Boral! - Is it them driving this expansion and intensification of forestry and logging? If so, why do they have more influence with the NSW Government than the people that the government purports to represent? I wouldn't like to suggest massive undue influence, mateship, favours and political donations are the driving factors, as that would be to suggest corruption on a grand scale.

But there is clearly something sinister behind the NSW Government wanting to continue such a fundamentally flawed policy as the RFAs and then throwing in the Coastal IFOA on top to exacerbate the deadly effects of an already failed policy, with the only beneficiary being large companies like Boral.

“One size fits all” – the application of one set of rules to most of NSW remaining “Coastal” forests:

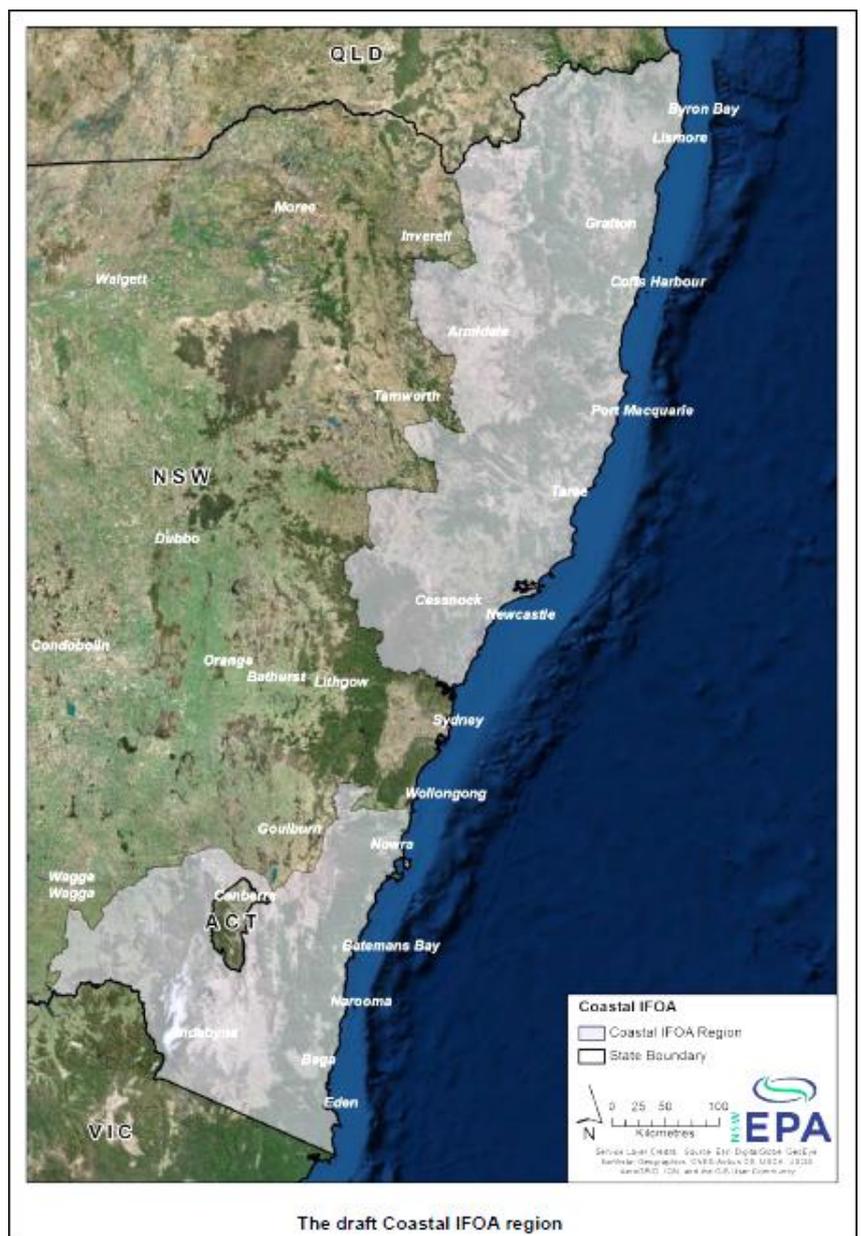
To consolidate almost all of the “Coastal” forests of NSW into one large area is clearly ridiculous.

To begin with, in no way could all these forests be considered to be “Coastal”, as this map (at right) shows – many are hundreds of kilometers inland.

Moreover, each forest is unique – in extent, in type of soils, in species composition, in amount of rainfall, in aspect, in amount of sunlight, etc. To impose one set of rules universally is just a meaningless bureaucratic simplification in order to facilitate expansion of logging operations in favour of Boral and other logging companies.

The draft Coastal IFOA if it becomes policy will allow these companies to “let rip” in any forest area they like, many previously unlogged due to previous “no-go” areas such as steep slopes, inaccessible or high ecological value areas, stream buffers, etc. It is utter madness to propose such loose “rules”.

Why is the government condemning our remaining native forests to certain annihilation? Haven't we done enough damage in 230 years?



To continue in the “settler” mindset in this modern age is to be willfully blind, to acquiesce to the (incorrect) idea that many of the worst practices of the past are entrenched and cannot be changed; and to do nothing to challenge the status quo.

Worst of all, it does nothing about reviving the idea of custodianship, and the idea that we should leave the land in the same or better condition for our children and grandchildren, and so constitutes intergenerational theft on a huge scale. They will not thank us for this, and they will not thank us for ignoring the very real threat of Climate Change, and intensifying logging of native forests is going to make Climate Change worse!

What on earth is the Government thinking? This draft policy is a terrible travesty of intention compared to what we *should* be doing.

The draft Coastal IFOA policy is not fit for any purpose except trashing our remaining forests until none are left, *and it must be dropped*.

Current Coastal IFOAs are not achieving their original purpose!

The NSW Government admits that the current Coastal IFOAs are a total failure, but the proposed solution is to consolidate them into one large policy and loosen the rules! Talk about throwing your hands into the air and giving in to the forestry lobby, who will have carte blanche to “let rip” in a forest logging free-for-all that will result in the total destruction of all our remaining forests, together with all the poor creatures that live in them.

In NSW we have currently over 1000 plants and animals on the endangered species list! This is horrific in the extreme.

Q: How is the draft Coastal IFOA going to help this list shrink?

A: It isn't. In fact it is going to add to the list, no doubt about it.

It's time the NSW Government learned that allowing our environment to be trashed for private profit is no way to look after it, and never will be. The Government should be curbing the excesses of the private sector's search for profit, not enabling them!

The Government is there to *regulate*, otherwise what is the purpose of having Government? The NSW Government knows that 1000 animals and plants are in danger of extinction in NSW (including the Koala, for goodness sake!), and are not doing their job of reversing this catastrophic trend. We are about as good as a third world country ripping down their rainforests for palm oil, and yet we are supposed to have a “clean, green image” which is worth a many Billions of tourism dollars. What a farce: If only foreigners knew the truth!

Draft Coastal IFOA: The NSW Government has committed to delivering the stated 4 objectives “without eroding environmental values or impacting wood supply”:

This is pure and simple rhetoric (aka BS), because it is **IMPOSSIBLE** to do both, of course. The Draft Coastal IFOA *must be dropped!*

No NGOs were involved in the draft Coastal IFOA:

The Environment Protection Authority (EPA), the Forestry Corporation of NSW (FCNSW) and the Department of Primary Industries (DPI) – Fisheries have worked together to come up with conditions in the draft Coastal IFOA. Not one NGO was invited to have input – why?

The result is that the draft Coastal IFOA is so heavily weighted towards benefitting the forestry logging industry, and so simplified that it amounts to letting the logging industry “let rip” in our remaining forests. It is a disgracefully

biased piece of proposed policy and should be dropped, not adopted. It takes all the faults of the previous Coastal IFOAs and exacerbates them so that logging is given total priority over any ecological values of forests.

My opinion is that ecological values should be given TOP priority these days. We should start treating our environment with the respect it deserves as the origin of our water, our oxygen, and our lives. How are we going to exist when all the oxygen-making trees are gone, and vastly increased CO₂ in the atmosphere has cooked the planet? We really have to start addressing this long-term question, instead of pandering to the whims of the logging industry.

After all, many industries have come and gone over time, in quick succession, but our fundamental dependence on our environment endures, so why aren't we seeking to look after it instead of trashing it? Hardly anyone would miss the demise of the current public forest based logging industry, which should be able to survive on plantations by now.

I think that the NSW Government needs to take a long hard look at their ideas, their philosophy and their ideology for the good of the future, and drop their addiction to "the Market", big business, money and other things that distort the reality that we are fundamentally dependent on how we treat all the living systems we depend on.

Drop the draft Coastal IFOA, let's make this a turning point in human history!

The proposed Coastal IFOA "Multi-scale landscape approach":

The "Multi-scale landscape approach" is an exercise in pure BS to facilitate logging in every forest, ie, a "let it rip" policy! Do you really think that we cannot see through these "Clayton's rules"; this "fake environmental policy"? You should be ashamed of yourselves for proposing to facilitate such deep and wide destruction.

I really don't need to tell you that fragmentation of forests is a **Key Threatening Process** for all ecological communities, do I? Yet massive fragmentation of our forests is precisely what is explicitly proposed, as stated in the "Multi-scale landscape approach": – "areas of refuge", and "dispersal opportunities" for native species – presumably as they flee in front of the bulldozers and other massive heavy machinery available for forest destruction these days – designated as "new technology".

I can hardly believe that the government departments who wrote this egregious draft policy could come up with such fakery as to try to make us believe that extensive and intensive logging will preserve the ecological values it is quite simply totally destroying! It's a massive attempt to con the public, and you know it.

Again I say, drop this draft Coastal IFOA, it is not fit for any purpose. Think again about what you are proposing to let happen.

I would rather see the **environment given priority**, and then we can decide what wood products we need, and where to source them from, and how careful we need to be while we are doing it. Please, think about this new approach, and drop the Coastal IFOA proposal.

Harvesting practices: intensive, selective and mixed intensity harvesting and alternate coupe logging:

On NO account should "intensive" or mixed intensity harvesting be allowed at any time or in any forest. A forest will NEVER recover from such treatment, and will be gone forever. This is not what I want, and not what the majority of people in NSW would want, if you asked them individually. Only loggers and the owners of logging businesses want this, and they are a very tiny proportion of the population to have such a disproportionate influence on what happens to our forests, which are *supposed* to "belong" to the people.

Why not ask the people what they want for their forests? Right now the main opposition to logging are grass roots pressure groups who are very knowledgeable about forests, and are attracting a great following; yet they are consistently excluded from important forest policy formulation.

I feel that most people in NSW are actually unaware of what is really happening in the forests, as the majority of them live in Sydney and are busy with their lives, only dimly aware of our native forests and what is being done to them. Exhibiting draft plans on the internet is NOT a substitute for genuinely asking people what they want – it is merely a way to satisfy statutory obligations and actually avoids REAL consultation with the wider population.

I also take issue with this statement from the Executive Summary:

“The harvesting limit settings in the draft Coastal IFOA will also be supported by a comprehensive monitoring, evaluation, review and implementation framework, to ensure any potential environmental impacts are identified and adaptively managed into the future.”

To date, there has been little or no monitoring, evaluation, review, etc. Indeed the NSW Government has almost completely failed to comply with its own legislation during the last 19 years of the NSW RFA, for example. On what basis do you think that is going to change? Has there been more money put into the compliance section of the EPA? I bet the EPA are suffering cuts just as most government departments are. I simply don't believe that environmental impacts will be managed, mitigated or stopped. The very intention of “intensive harvesting” suggests that there are going to be very serious environmental impacts, so it is disingenuous to suggest that “all will be well” - It won't!

Please, drop the draft Coastal IFOA, and rethink everything. Our forests depend on it, our forest creatures depend on it.

Wildfires:

There are plenty of studies and evidence that the outcome of the proposed harvesting practices will exacerbate the danger, intensity, frequency and extent of wildfires, especially given worsening Climate Change:

[...one of] “the desired outcomes for the harvesting practices and limits are: **Harvesting is distributed across the landscape and over time, to support a mosaic of forest age-classes** and the maintenance of forest structure locally and across the landscape.” [my emphasis, extract from Executive Summary]

Only an intact mature forest has a chance of resisting total destruction by an intense wildfire, something which we are already suffering more of due to higher temperatures caused by Climate Change.

Indeed, **the very worst thing you can do in the face of this heightened wildfire risk is to break up forests into a mosaic, with blocks of young trees interspersed among older trees, as young trees burn harder and faster than any other trees.**

It is abundantly clear that no thought whatsoever has been put into this “mosaic” idea, except that it allows harvesting of large swathes of forest away from the public eye, a very cunning trick perfected over the decades of forestry practices in Australia.

Mapping, vegetation and tree classification:

I am a cartographer with qualifications in GIS. I am well aware of the problems of accuracy and precision in GIS mapping. I am also aware that much of the GIS vegetation mapping done by the NSW Government over the years since GIS became available has been extremely inaccurate to the point of being **useless**.

Moreover, the statements in the “Coastal IFOA – Conditions Consultation Draft” document freely admit that the mapping is completely hopeless (see page 54) – “unmapped forest”, “unmapped ESA(s)”, “incorrectly mapped”, etc.

To go ahead and start logging anyway, despite the NSW Government **knowing and admitting** that they have a **grossly inaccurate database** is utter folly, unless extensive ground-truthing is done by an independent person, **well BEFORE any logging is proposed for any area.**

I read that the Government is proposing to review the mapping of Old Growth Forest in order to reclassify it, presumably with an intention to destroy some of it by logging it. This is very alarming.

I also read that the definition of a "Large Tree" has changed, so that larger and larger "Large Trees" can be reclassified as *smaller* "Large Trees", therefore available for logging.

There is also a proposal to halve riparian tree buffer zones from 10m to 5m wide - again, to enable more logging. This is really playing with data, changing definitions and relying on inaccurate mapping *in order to facilitate the logging industry's need for more and more product to meet shortfalls in wood supply.*

Why bend over backwards like this? Why do Boral et al have more sway in these decisions than the people of NSW, who supposedly OWN the forests? Why are we so intent on smashing and destroying our natural heritage? What's wrong with us?

Really, the NSW Government should be asking itself these questions, it is well past time.

Drop the draft Coastal IFOA, we don't want it.

Conclusion:

We are way past the time when we should still be thinking of Australia as a White Man's paradise to conquer, use, or destroy for profit at will. After 230 years, it is well past time to have a fundamental shift of our thinking and our attitude to the natural environment, which after all, we all depend on. The draft Coastal IFOA does nothing in this direction; instead it entrenches and exacerbates the "business as usual" attitude, which is a model of destruction of *public* forests for private profit, enabled and encouraged by governments.

Indeed, the draft Coastal IFOA further delegates the fate of our *public* forests into the *private* hands of those who would use and destroy them, by allowing an open slather and "let rip" all-rules-relaxed scenario.

The draft Coastal IFOA is an egregious plan to enable the further and irreversible destruction of our precious and fast-dwindling forests, endangered plants and animals, and must be dropped immediately.

We require a completely new ethos towards our environment in NSW and Australia: one of stewardship and custodianship. It is time we learned to grow up and mature, and to look after the environment that gives us life.

Drop the draft Coastal IFOA, for goodness sake!

Thank you for the opportunity to comment,

Yours sincerely

Claire Bettington.