



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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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**Country\*:** Australia

**Stakeholder type (circle)\*:** I am a retired NSW public servant (NPWS 1973-2012)

Community group	Local Government	Aboriginal group
Industry group	Other government	Forest user group
<b>Environment group</b>	<b>Individual</b>	Staff

**Organisation name:** Climate Change Australia – Hastings Branch, and, No Electricity From Forests

**What is your preferred contact method (circle): Mobile, Email or phone?** Email  
**Would you like to receive further information on IFOA and forestry matters?** Yes  
**Can the EPA make your submission public\* (circle)?** Yes  
**Have you previously engaged with the EPA on forestry issues?** No

**Make a submission – Form**

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

The whole document is important to me, in an alarming sort of way.

The proposed IFOA changes make the monetary value of state forests for the benefit of corporate interests the number one priority, while ignoring all other values. These values are more important to me than whether a company makes a profit from logging our forests. Values that sustain complex and awe-inspiring ecosystems of great biodiversity, the web of life which provides habitat for flora and fauna, many rare and endangered species, clean water, protected catchments, soil conservation, places for human enjoyment, and climate change mitigation through carbon capture, are all ignored here.



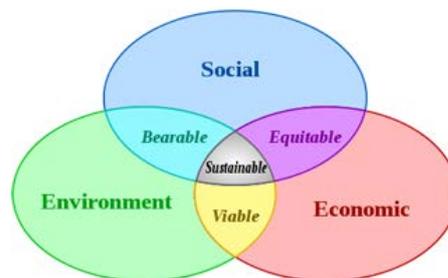
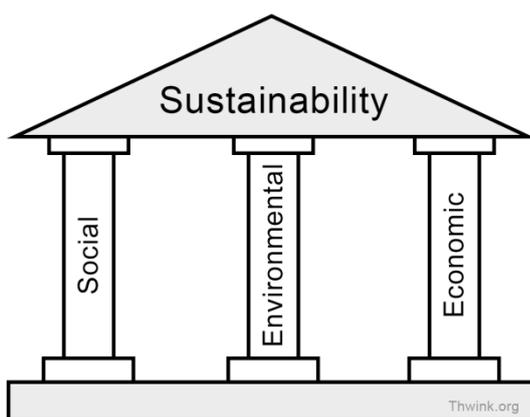
The IFOA must be renegotiated to recognise and restore these diverse values, all in good measure. Please see my answer to Q6 for what is a serious omission from the proposed changes to the forestry IFOA rules - **the value of forests to combating climate change**.

**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?**

It is not possible to say that the proposed IFOA changes will have any positive environmental outcomes, or any positive outcomes for sustainable timber production. They don't. The only positive outcome that can be claimed by someone with a very narrow view of the situation is one for corporate profitability in the short term. I base this conclusion on good advice:

In its 2016 [Forestry Industry Roadmap](#) the NSW government made a dual commitment to maintain logging levels **without eroding environmental protection**. However, when the NSW Natural Resources Commission was tasked with finding a way to do this, it [reported](#) that, 'it is not possible to meet the government's commitments around both environmental values and wood supply'.

The proposed IFOA changes demonstrate a level of irresponsibility in natural resource management hitherto not seen, and should be seriously re-considered. The glaring omission is the best-practice policy commitment to **the 'triple bottom line' of sustainability** as shown in the following diagrams:



The need to maximise timber production is being pushed to the exclusion of the two other principles, and this makes for very bad policy given the level of responsibility implied in the concept of a 'social licence' to manage our natural resources - always consider the bigger picture and include all three pillars of sustainability.



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?

Logging of state forests will dramatically intensify between Taree and Grafton, across a 140,000 ha North Coast Intensive Zone. The new IFOA appears to be an effort to obtain as much wood in as short a time as possible. This can only be done by allowing clear felling - bulldozing large areas of entire eco systems, rather than selective logging.

Logging on the scale envisaged can only have one consequence - the replacement of existing diverse forest communities on the NSW north coast, creating **forest mono cultures**, biological deserts with extinctions of many threatened and endangered species of flora and fauna, along with other detrimental environmental and social impacts.

Most headwater streams will have their current buffers reduced from 10 to 5 metres. Many areas that have been protected for twenty years will now be open to logging. The consequences of **catchments drying out, soil erosion, and sedimentation / water contamination** are obvious and should be addressed by restoring the buffers to 10 metres.

The Threatened Species Expert Panel Final Report notes that increased intensity of logging has occurred in northern NSW for the last 11 years, stating that this was not the intent of the original IFOA. Forestry Corporation is now being rewarded for breaching its social licence and the rules. No effort was made to assess the environmental impact of 11 years of intensive harvesting as the basis for this new regime, which now seeks to formalise the practice. Indeed no scientific assessment is apparent at all – just a crude policy priority to meet timber supply contracts, regardless of impacts.

Koalas will only need to be searched for in southern NSW where they are almost extinct. There will be **no search for koalas in the north-east forests**. Koala maps will be prepared without on-ground searches. The government's recently announced Koala Strategy is a sham, with few new reserve areas and many reserve areas having no records of koalas in that vicinity! Some areas are so severely degraded that their value is questionable. Habitat loss is the key threatening process to the survival of this species and the IFOA changes will make a bad situation worse.

The proposals are a fundamental shift from the past twenty years of forest management and will remove the need to survey and protect occupied habitat for most threatened species. There is almost no data to support these changes and local extinctions are inevitable. How can this be allowed for our national icon, the koala? What will the final judgment be on this reckless policy in years to come?



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)?

They will be ineffective. The maximum size of legal clear felling under the current forestry agreement is 0.25ha. The new proposals are for a maximum of 45ha - a 180-fold intensification of logging. This clearly demonstrates a change of policy to prioritise timber extraction over ecological conservation and other values.

As well, so called 'selective harvesting' will increase in intensity (so-called heavy Single Tree Selection). Giant blackbutt and other trees up to 160cm (up from 140cm) will be allowed to be logged. These are majestic giant old growth trees. Old Growth Areas have already been reduced to allow for increased logging at the expense of previously agreed 'permanent' public reserve areas.

The government's dual commitments to no reduction in wood supply and no erosion of environmental values cannot be met by the new IFOA rules. With the NSW government proposing to log old growth forests and even rainforests, to increase logging intensity, introduce clear-felling, reduce buffers on headwater streams, and remove protections for most threatened species on public land in north-east NSW, it is clear we have been misled.

If permitted as planned, the new industrial-scale logging up and down the north coast of NSW will eventually become apparent to people living here. Don't imagine they will take it lightly because **we treasure our beautiful environment**. Here is an extract from the recent PMHC Biodiversity Study, undertaken to help plan future development in our region:

*Who wouldn't want to live in a region with beautiful beaches, water ways, nature reserves and over 40,000 hectares of national park and state forest? Talk to any local and they will tell you that life in the Port Macquarie Hastings region is enriched by our natural environment. It's our biodiversity which sets us apart, allowing our unique waterways, flora and fauna to thrive. Our region's biological resources are precious. As a community, we are all stewards of our local environment and we need to take responsibility for using and sharing it in a responsible and sustainable way.*

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

No – see answers to questions above and below. The government justifies these changes on the grounds that they promised the industry that they would meet existing wood supply obligations. It is clear that this took precedence, to the detriment of all other values of a forest and the human communities living



nearby. What about the promise to us, to protect the environmental values of our forests?

Under the proposed changes, 58% of the timber in north coast and tablelands state forests is being identified for sale to overseas companies as pulpwood or as fuel for burning in power stations. **These are the people's forests**, a resource to be looked-after, not trashed to meet an unrealistic and irresponsible supply commitment to the timber industry.

The promised jobs are limited, by some estimates there are only 600 people employed in the NSW timber industry, they are mostly low skilled and low paid and will be further reduced by automation and mechanisation. Forestry practiced this way is like mining - forests will not be able to meet the volumes of timber needed and supply will run out. Short-term benefits will flow to large-scale operators and financial interests, leaving the public with seriously degraded forests and a host of many long-term negative impacts, likely to be felt throughout the community for generations to come.

Further, it is predictable that whatever protection remains in place, it will not be effectively supervised, allowing industrial-scale logging to proceed with impunity. Witness the pictures in the PDF file accompanying this submission – some logging operations in north coast forests are already happening in contravention of earlier agreements.

It is disappointing that offers to show staff of the Premiers Department, Natural Resources Commission and federal departments, around far north coast forest sites were initially accepted, but then cancelled for reasons unknown, but at a guess because it would reveal what was really going on. This attitude does not inspire confidence in either the forestry planning or the forestry regulatory regime.

The Forest Corporation should be acting as guardians of our forests. Instead, there has been an almost complete lack of transparency and accountability. The industry increasingly acts as a law unto itself with a culture which ignores the need for proper scientific environmental assessments to ensure protection for wildlife and other environmental safeguards. It's time to show the public that this round of public consultation is being taken seriously and has not already decided what will happen next.

## 6. General comments      **Forests and climate change**

In all the documents provided on the proposed IFOA changes, I cannot find any reference to **the importance of forests in tackling global warming**, now leading to serious climate change. Quite how any decision-maker in 2018 can omit this imperative for the survival of society as we know it is both



amazing and depressing and I urge the EPA, the Corporation, and the government, to take this issue seriously when it comes to the management of forests in NSW.

Forests, especially old growth forests, are **a natural carbon sink**, a giant storage bank of carbon which needs to be retained, not let loose into the atmosphere where it will add to the build-up of greenhouse gases, trapping excess heat from the sun, causing global warming. Everyone involved in forest management and regulation, from the minister down, must accept the responsibility to current and future generations to tackle climate change. This must come before any commitment to a particular company's balance sheet, which appears to be the main driver of the proposed changes.

At very least there needs to be a requirement to produce **a carbon budget for every logging operation**, based on a scientifically sound methodology for determining the carbon emissions that will arise. This should be a public document since we all have a very personal stake in the future of our climate – our very survival on this planet. Forest harvesting results in substantial carbon release and only if the timber harvested is kept as wood, then that part does not re-enter the atmosphere as CO<sub>2</sub> but we know that supply for building materials, which we support, is only a small component of total demand.

The new IFOA is designed to reduce most of the timber to woodchips and pellets for export and burning, hence an inevitable surge in carbon emissions from the destruction NSW forests. It is misguided to claim any sort of 'carbon neutrality' in forestry operations. Saplings do not sequester the large amounts of carbon that are lost through logging. As well, dense young vegetation is more flammable than the mature forest it replaces, increasing the risk that it too, will be lost to the atmosphere.

Burning logs for electricity is a particularly obnoxious development in forestry practice. Wood is not a renewable carbon-neutral energy source – the entire life-cycle process emits even more carbon than burning coal emits. Forests should be **managed to protect their great stores of carbon**. Given what we know for sure about global warming and climate change it is reckless to burn forest timbers for electricity. There are carbon-free alternatives like solar and wind becoming cheaper by the day. Just because the forestry companies served by the Corporation are not invested in clean energy is not good enough reason to continue with this destructive policy change.

Instead, there is money to be made from conserving forests. NSW forests could benefit from the federal government's Emissions Reduction Fund (ERF), which is big on tree planting and tree retention. Indeed the government claims to have 'saved' 80 million tonnes in avoided emissions this way since 2014.



A report by The Australia Institute, titled Money Doesn't Grow on Trees, says (page 12):

*While national emissions from forestry are estimated at 38 million tonnes annually, the Kyoto Protocol limits credits from forest management to 3.5% of base-year emissions, which is approximately 15 million tonnes of CO<sub>2</sub> equivalent per year. If Forestry Corporation were to capture just one fifth of this budget, it would be worth over \$40 million per year in revenue from the ERF. ... citizens of NSW would be \$40 million per year better off if native forests were left alone rather than logged.*

In conclusion here are the policies the current situation demands:

- An end to logging public native forests.
- Stop the use of native forest resources for woodchipping and energy generation.
- A transition plan away from native forest logging to plantation timbers and alternative natural fibres.
- High-level conservation in native forests to protect biodiversity and catchments, store carbon, and provide new recreational opportunities.
- A Greater Koala National Park, as proposed on the mid north coast.

ENDS

# Forest destruction already happening

July 2018

And if you think what you see in these pictures is bad, wait until the IFOA rule changes come into effect. Impacts will be worse until little is left of the bio-diverse north coast forests, home to koalas and other native animals, protection for watercourses, and great stores of carbon to help combat climate change.



and the only tree left standing is a dead tree



Once were giants, now juveniles



Intensive logging – Coorabakh Road, late 2017



New IFOA rules allow clear-fell across 140 000 ha



Clear-fell close up, Lorne area 2017



Making a start – soon all these trees will be gone



Making way downhill – Lorne area 2018



Clear-fell – like a scene from the battlefields of WWI



Mid north coast forest logging scene 2017



Thin logs for wood chips and pellets



The machinery of destruction and job losses