

## IFOA REMAKE SUBMISSION

My submission is by way of objection to the erosion of the hard fought biodiversity protections embodied in the former Upper and Lower North East IFOAs and accompanying threatened species licences.

I believe the following aspects of the IFOA Remake have the greatest potential to damage biodiversity values and connectivity, which is vital to fauna:

- I. Increasing logging intensity
- II. reducing stream buffers and connections between catchments
- III. logging old growth forests
- IV. abandoning pre-logging surveys and threatened fauna species prescriptions.

I. Increasing logging intensity

There is little (if any) scientific evidence to support even the logging intensity of the previous IFOA, at least from the perspective of retaining and enhancing the biodiversity values of our public forests which are held in trust for the people of NSW.

Monitoring and reporting by the publicly-owned forestry agency has been disappointingly sub-standard at best. The implications of this situation on key biodiversity values may have been able to be highlighted within government if public agency auditing had been extensive and robust, however, auditing has been inadequately resourced resulting in private individuals having to resort to conducting audits which have found repeated breaches of existing biodiversity protections.

More intensity will simply turn our public forests into the simplistic structure of defacto plantations favouring millable timber which can only have a deleterious effect on biodiversity which relies on much greater habitat complexity.

If the past is a salient lesson for the future, then coupled with sub-standard (at best) monitoring and reporting from the public forestry agency and an inadequate and under-resourced program of auditing by the agencies responsible, our forests will continue to degrade and the biodiversity hotspot tag which was once applied will be lost forever.

II. Reducing stream buffers and catchment connectivity

Again, biodiversity loses its precarious toehold when logging and all its associated disturbance to aquatic habitat, resulting weeds and fire encroach on riparian habitats. It seems that the concept of buffering is only being paid lip-service when there are proposals to reduce stream buffers to 5 metres in some instances!

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III. Old growth forest logging

Perhaps one of the saddest aspects of the remake is the suggestion that up to 70% of old growth mapping undertaken with the previous CRA/IFOA is wrong and that these areas should be opened up to logging. The purported mapping 'error' of this scale can only be interpreted by the fair-minded public as an attempt to rort the system to deliver unsustainable logging volumes. Sadly our

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hollow-dependent fauna will be the losers, many of which are threatened and now no longer found on most of the coastal lowlands.

#### IV. Abandoning pre-logging surveys and threatened fauna species prescriptions

With the loss of pre-logging surveys for threatened species so goes the opportunity to protect their habitat in situ. The biodiversity implications of this poor decision are magnified when coupled with the reduction in species-specific prescriptions. Species-specific prescriptions were introduced as there was agreement that they were the best way to protect these populations and their habitats in situ. Properly conducted surveys are highly relevant and the training of those charged with undertaking them should be upscaled to increase their effectiveness.

Once again, there is little if any science behind abandoning surveys and the decision appears driven by the 'don't look don't find' mentality which services the maintenance of wood supply as the top forest value.

#### Conclusion

I am greatly concerned that the IFOA remake proposed will result in local extinctions of threatened species, over-simplification of habitat and resultant loss of ecological function on a large scale. I suspect that insufficient resourcing of and governance attention to monitoring, reporting and auditing will provide a convenient smokescreen to hide this situation from the NSW community, possibly until its too late.

Public forestry in NSW should expect to be the subject of intense scrutiny if the IFOA Remake proceeds in its current form as there is little trust in industry's capacity to carefully manage biodiversity values for future generations when wood supply trumps biodiversity in such a obvious way as demonstrated by the Remake.

Please accept this as my personal, individual submission. I give permission for the my submission to be made public but with my postal and email addresses and phone number removed for privacy reasons.

Yours sincerely

Dianne Mackey

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