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- Q1. **First name** Joy Oddy
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- Q7. **Country** Australia
- Q8. **Stakeholder type** Other
- Q9. **Stakeholder type - Other**  
Health/Environment
- Q10. **Stakeholder type - Staff**  
not answered
- Q11. **Organisation name** Doctors for the Environment Australia
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** not answered
- Q14. **Can the EPA make your submission public?** Yes
- Q15. **Have you previously engaged with the EPA on forestry issues?** not answered
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**  
not answered
- 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?**  
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**

See attached submission document.

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**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

# Submission regarding the proposed changes to timber harvesting in NSW's coastal forests

July 2018



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Healthy planet, **healthy people.**

#### **DEA Scientific Committee**

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Prof Hugh Possingham  
Dr Rosemary Stanton OAM

Prof Stephen Boyden AM  
Prof Michael Kidd AM  
Prof Ian Lowe AO  
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Prof Lawrie Powell AC  
Dr Norman Swan

Prof Emeritus Chris Burrell AO  
Prof David de Kretser AC  
Prof Robyn McDermott  
Prof Emeritus Sir Gustav Nossal AC  
Prof Fiona Stanley AC

## About Doctors for the Environment Australia

Doctors for the Environment Australia (DEA), the organisation making this submission, is a voluntary organisation of medical doctors in all states and territories. Our vision is 'healthy planet, healthy people'.

DEA recommends that on human health grounds;

- All logging of Old Growth Forest ceases due to its ecological significance and importance for human health.
- Logging to Native Forest should also cease but could be phased out over a short period of time.
- If logging is to proceed, accurate data needs to be collated on each zone that is proposed for logging. It is clear that current data is inaccurate and inadequate. It would be negligent to pass laws based on the current knowledge and accuracy of information.
- Native forest areas of high ecological value should also be protected, specifically koala habitats.
- Maintaining the "Special Management Zones" in order to protect areas that are already protected.
- Expanding the reserve system in order to protect areas that are newly identified as being of ecological significance.
- An increase in transparency so that there is a broader inclusion of community and industry groups in the decision making process. Specifically the annual reports that are specified in the "protocols", need to be made available every year. This is important so that the areas to be harvested and the environmental impacts can be accurately assessed. The NSW government needs to remain committed to the dual objectives of timber supply and environmental protection.
- An expansion of the plantation industry in order to provide further wood supply for industry.

# Introduction

DEA understands that human health and wellbeing are absolutely dependent upon a rich, biodiverse planet where all ecosystems sustain life in balance. Humans need a future with clean air and water, healthy soils producing nutritious food and a complex, diverse and interconnected humanity whose needs are met in a sustainable way.

We work towards sustainable development that meets the needs of the present generation without compromising future generations. DEA has a distinguished board of advisors whose knowledge of medical and public health issues is fully contemporary and our members include doctors and medical students from all facets of medicine.

Recent DEA submissions that are of relevance to this submission

DEA Biodiversity Policy

[https://www.dea.org.au/wp-content/uploads/DEA\\_Position\\_Statement\\_-\\_Biodiversity\\_-\\_August\\_2014.pdf](https://www.dea.org.au/wp-content/uploads/DEA_Position_Statement_-_Biodiversity_-_August_2014.pdf)

DEA submission to the Victorian Government on protecting the environment

[https://www.dea.org.au/wp-content/uploads/Protecting\\_Victorias\\_Environment\\_-\\_Biodiversity\\_2036\\_Submission\\_05-16.pdf](https://www.dea.org.au/wp-content/uploads/Protecting_Victorias_Environment_-_Biodiversity_2036_Submission_05-16.pdf)

DEA submission on Australia's Strategy for Nature 2018-2030: Australia's biodiversity conservation strategy and action inventory

<https://www.dea.org.au/wp-content/uploads/2018/03/Strategy-for-Nature-2018-2030-Submission-03-18.pdf>

DEA submission to the Senate on the Inquiry into the United Nations Sustainable Development Goals (SDGs)

<https://www.dea.org.au/wp-content/uploads/2018/04/United-Nations-Sustainable-Development-Goals-SDG-Submission-03-18.pdf>

# Submission

DEA has significant concerns regarding the proposed changes to the timber harvesting in NSW. The Integrated Forestry Operations Approvals (IFOA) will not adequately protect forests and biodiversity. The aim of the NSW government is to "balance environmental outcomes with timber production", however, the proposed changes do not protect the environment nor do they protect biodiversity. Consequently, there is a significant impact on human health. No longer can jobs be traded against a sustainable environment and health. Jobs are replaceable by intelligent governments, the environment and species are not. The history of deforestation tells us that "balance means loss of more forest" every time it is perpetrated.

Human health is inexorably linked to the environment. Forests are particularly important as they provide us with clean water, clean air, and, by storing carbon, they mitigate against the effects of climate change.

Climate change is the biggest threat to health this century. Global emissions are rising and with it global temperatures. Since humans have been on the earth, the earth is now hotter than it has ever been before. This is due to human activities, which includes clearing and burning of forests.

The impact is being felt in Australia with an increase in deaths from weather related events and a decrease in food production. One of the most important interventions to prevent further catastrophe is to protect our forests from logging.

Forests have also been shown to help with numerous medical conditions including stress, anxiety, pain, mood disorders, hypertension, childhood learning, insomnia, rehabilitation for substance abuse and forests can improve immune function.<sup>2,3</sup>

DEA recommends the cessation of all native forest logging and see an expansion in plantation forestry. At a minimum, DEA recommends a stop to all Old Growth and rainforest logging.

Consequently, DEA does not agree that the *“Coastal IFOA conditions will accomplish the three aims of maintaining environmental values, while ensuring wood supply and achieving social outcomes in NSW State Forests.”* (Coastal IFOA Consultation draft).

## **Aims of the New IFOA Draft**

The aims of the draft is to prescribe, *“the minimum standards that must be met to protect native plants and animals; important habitat and ecosystems; soils and waterways, during and following forestry operations.”*<sup>4</sup> However, it appears that there is insufficient data on which to make this assessment. And in any event scientific studies show that even access by roads driven into important ecological areas causes ecological harms.

The Natural Resources Commission (NRC) in the “Supplementary Advice on Coastal Integrated forestry operations approval remake” repeatedly noted

*“The Commission’s pilot identified significant errors in current old growth forest (HCVOG2) and rainforest (CRAFTI3) maps, in terms of forest extent and location.”*

*“Before potentially rezoning any areas for harvesting, there needs to be a verified loss of wood supply arising from the Coastal IFOA provisions.”*

*“Based on the findings on the sample sites, FCNSW (following a request from the Commission) has estimated that the volume of timber that could potentially occur in areas that have old growth forest ecosystems that exceed the committed 60 percent JANIS target. The Commission notes this estimate is based on a small, unrepresentative sample and contains several assumptions, and that forecasts are inherently uncertain. As such, caution should be taken when considering this indicative number.”*

*“It is important to keep in mind that the figures above are estimates, with low levels of confidence, and, that any increase in standing stock does not mean there is an increase in wood supply.”*

*“The Commission notes that the pilot findings represent a small, unrepresentative sample of all state forest compartments in north east NSW, and contain several assumptions. As such, caution should be taken when considering this indicative number due to bias in the sampling. However, the pilot (and PNF remapping) has confirmed there are significant errors in old growth forest and rainforest mapping in the state forest compartments selected, in the extent and location of old growth and rainforest.”*

*“The Commission emphasized that the predicted wood supply impacts were an estimate, and recommended that provisions for effective monitoring and adaptive management be adopted as part of the new Coastal IFOA. These provisions are essential to continue reducing uncertainty in current decision making, and to ensure a robust evidence base for future decisions and reviews.”*

It should also be noted that the NRC said, *“The Commission did not undertake comprehensive old growth assessments and did not make decisions about which areas may be harvested.”* Yet the EPA has used the NRC advice in putting together the IFOA proposal.

If logging in native forest is to occur, DEA recommends that accurate evidence be collected from which to make further decisions regarding timber harvesting. Since the original mapping of these areas there has been an improvement in mapping techniques and these should be incorporated into new assessments before any further timber harvesting from native forests.

It is unclear from the documentation how a particular area is going to be identified for logging. It is clear from the above statements that extensive research needs to be done, in each site, before logging is planned. The IOFA is impressive in its protocols and documentation but this does not substitute for adequate identification of logging sites.

## Background to the IFOAs

It appears that the NSW government prematurely signed the "Wood supply agreement" in 2015. The NRC was requested by the NSW Premier to advise on the settings for the new Coastal IFOAs. The NRC's initial assessment stated, *"the Commission reported there would be an estimated shortfall of 7,600 to 8,600 cubic metres of high quality timber per year, as a result of mapping threatened ecological communities and koala protections."*

Subsequently the NRC has been asked to revise its initial assessment, which stated, *"However, due to an estimated wood supply shortfall, the Commission determined that it was not possible for the NSW Government to meet its commitments to both environmental values and wood supply."* (page 75)

DEA does not accept that simply rezoning forests is an adequate solution to the need to supply timber for the previously signed agreements. It has been a mistake to sign the "wood supply agreement" and to change the laws to allow logging in otherwise protected areas would be another mistake. It is poor government to change laws to hide previous errors. It only worsens the situation.

## Deficiencies of the Proposed IFOAs

DEA notes that one of the objectives of the IFOA is to, *"reduce costs associated with implementation and compliance"*. This would imply that the current costs are too high. What are these costs? Are these the costs of adequate assessment and approval? If the IFOAs are approved, does this mean that there will be less approvals necessary and subsequently less cost?

Are these the costs to industry or to the FCNSW? If these are industry costs, is the aim of this process to make logging cheaper for industry?

Native Forest is a valuable resource. It is valuable because of all the health benefits it provides. It is valuable because it mitigates against climate change, which, in 2017, cost \$129 Billion world-wide in climate-related events.<sup>5</sup> This does not even account for the value of clean air and water, let alone biodiversity. It should not be taken lightly to use this resource. It is unacceptable to streamline the process purely based on the cost of adequate assessment and regulation.

DEA has concerns about the proposed changes to the size of the areas that can be "intensively harvested zones". Previously this was 0.25 hectare but this has been increased to 45 hectares. A 180-fold increase. Experience has shown that some of these areas will totally cleared which is unacceptable from an environmental perspective.

Similarly, it will still be possible to harvest from old growth forest, even though the size of these areas has been reduced, it is clear that old growth forests need to be fully protected.



According to the NRC, to supply further timber from native forest much of this will need to come from the “zone 2” regions. These are the regions that are Koala habitats and are areas of ecological significance. These are the regions that have the highest ecological value and should not be logged. Similarly, some of those areas are difficult to access, which is likely to result to damage to other areas that are not within the proposed logging areas.

## References

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<sup>1</sup> <https://engage.environment.nsw.gov.au/forests>

<sup>2</sup> Shrin-Yoku (Forest Bathing) and Nature Therapy: A State-of-the-Art Review. Hansen M, Jones R, Tocchini K. International Journal Of Environmental Research and Public Health 2017,14, 851

<sup>3</sup> Regulation of the immune system by biodiversity from the natural environment: An ecosystem essential to health. Rook G. PNAS (2013)110, 46, 18360-18367

<sup>4</sup> Coastal IFOA consultation draft <https://engage.environment.nsw.gov.au/29948/documents/77906>

<sup>5</sup> [https://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(17\)32464-9.pdf](https://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(17)32464-9.pdf)