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Q8. Stakeholder type	Forest user group
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?	No
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?

Those (inadequate) parts that relate to the conservation and enhancement of biodiversity, and natural values including climate moderation, stream health and quality, and reliable water supplies. The future of regional economies and ecosystems is much better served by managing the forests for their non-timber values. These seem to have been significantly diminished in the new draft version, said to be in the interests of easier compliance. The proposal to reduce buffers in head-water catchments down to 5m is strongly opposed. The need to undertake pre-logging surveys and apply appropriate protections for all threatened species currently requiring prescriptions must be fully restored. Surveys and the identification of exclusion areas must be undertaken by independent experts.

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 evident - reasons in following sections.

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?

The diminution of environmental regulations will not benefit environmental values. The design of the original conditions were 'negotiated' with forestry operatives, and surprise, they were not amenable to prosecution for lack of clear proof of guilt. The regular monitoring envisaged at the outset of the original IFOA was not carried out, there exists no adequate data sets by which to assess whether the ad-hoc environmental protections of the day had the hoped-for effect. It is even less likely that these new conditions, diluted for expediency, will be sufficient to even slow the precipitous loss of biodiversity that is presently being observed. The Governments have done well to ensure that there is 'Absence of Evidence'... As to the production of timber, the Australian forester seems to think that our forests can be managed as some sort of market garden, simply crops to be initiated, and given appropriate 'silviculture' they then come to fruition. Of course our forests are not simple crops, they are, or should be, fully complex and interdependent ecosystems. There is pitifully little attention given to the hundreds of thousands of Hectares of forests suffering from die-back (including BMAD). There are good grounds to suspect that 'management history' has a role in promoting these diseases of the forest, by FC 'experts' will defuse and distract. Apparently the 'Science' of forestry has not caught up with ecology. Rather, they see the complexity of the natural world as a pesky impediment to their vision of horizon-to-horizon tree 'crops. The forecasts that allowed the Governments to contract excessive volumes of timber products to industry, produced by FCNSW in-house 'magic box' FRAMES, have been shown by the experience of the last few decades to be hopelessly optimistic, corruptly so in my view. To now change the logging conditions to the clear-felling conditions, that are used in other parts for the production of crude wood-fibre, under the guise that this will somehow enhance the production of 'high-value' hardwood logs is highly deceptive. The loss to natural and biodiversity values from this speculative and dangerous change cannot be measured or controlled. The proposed changes to the tree-retention rules is especially concerning. Hollows take centuries to form, our forests are desperately low in them. Feed trees and Giant trees are both vital, and the proposals do not provide adequate protection. Millions of dollars more will be taken by the rapacious logging industry as 'compensation' for that they received gratis. This is already an industry that enjoys a host of hidden subsidies. NSW should do as a growing number of jurisdictions around the world are doing, and recognise that logging is one of the most damaging, and least profitable 'uses' of a natural forests. A transition out of native forest logging on public land and the transfer of public forests to protected areas when the RFAs expire is the only rational path.

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)?

The proposed protections are inadequate for the stated purpose. For example, the proposal that those Old-Growth Forest Ecosystems that were 'over-target' in the original CRA negotiations now be available for logging, is to misunderstand the nature of those calculations. They are not 'over-target' by accident. It is precisely because of the many other conservation values, not obtainable elsewhere, that these areas were selected. To remove them will have a dramatic effect of the overall target achievement. If there is anyone left in the bureaucracy who can still run C-Plan, this should be done as a matter of urgency, it will clearly show the folly of such a proposal.

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

No, in my view, it will achieve neither. The Regional Forest Agreements have failed to deliver either environmental protection or industry security.

Q21. General comments

not answered

Q22. Attach your supporting documents (Document 1)

not answered

Q23. Attach your supporting documents (Document 2)

not answered

Q24. Attach your supporting documents (Document 3)

not answered
