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| Q7. Country | Australia |
| 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?

In the draft the number of species specific conditions for fauna has grown. These conditions are unduly prescriptive and complex. Most of the conditions provide additional protection to species that are listed as threatened. The conservation status of threatened fauna species can be expected to change in the future. In particular the Biodiversity Conservation Act requires a review of currently listed species in accordance with international standards. This review will result in changes to the status of some species which are listed. Threatened fauna species should be detailed in the Protocols rather than the Conditions in recognition of their changeable status.

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?

The need for an effective regulatory instrument that maintains forest values in accordance with ecologically sustainable forest management principles is supported. It is recognised that there is value in operating rules that are transparent and easy to interpret. The draft is much easier to read and interpret than the existing IFOAs. The new layout is also an improvement allowing detailed information to be more easily found.

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 NSW Government gave a commitment to redo the coastal IFOA so that it would be less prescriptive and more outcome-based. The opposite has occurred. The Coastal IFOA consultation draft includes 20 "outcome statements" that are simply ambitious statements that do not result in demonstrable outcomes. The draft is a highly prescriptive instrument under which there is very limited operating discretion. The draft is a narrowly conceived document that provides no consideration to the dynamic nature of the Australian bush and the need for active and adaptive management. It naively assumes that classifying forest as a reserve is enough to protect it. The draft lacks the flexibility and latitude which is needed to achieve good environmental and commercial outcomes. Many of our native species require disturbance and the resultant fresh regrowth to survive. There are many examples where preserving forests has had a detrimental effect on wildlife; the 400+ koala population of what was Pine Creek State Forest have declined since the extension of the National Park and the disturbance ceased. The extreme regulatory controls being proposed by the EPA will not deliver positive ecological outcomes envisaged because of the lack of acknowledgment that forestry science has equal weighting with environmental science.

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)?

There is a need for careful consideration of environmental protection at the regional, landscape and operational scale. Before the EPA was involved in the regulation of forest management the then Forestry Commission employed professional foresters who applied the multi-use forest principles that achieved the same aim. This was undertaken without the need for excessive prescriptive regulation and the ecological health of the forests is a testament to their dedication. The benefit of the less regulated approach was that it gave the foresters flexibility and discretion to optimise the management of all forest values not just those considered important to the EPA whose charter is only focused on environmental values.

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

The main concern about the continued IFOA regulatory approach is that it endeavours to deliver an outcome to environmental detractors rather than validate that forestry can operate as a renewable and sustainable activity with improved environmental values. Ever increasing regulation seems to correlate with the politicisation of forestry operations in concert with the philosophy demonstrated by some government agencies that oppose in principle any forestry practices. It is apparent that the proposed changes are more about appeasing those who oppose any form of forestry than the science.

Q21. General comments

It is also a concern that neither the Industry or the Department of Primary Industry (DPI) had a role or indeed were consulted in the formulation of this draft. Particularly the DPI could have made a significant contribution especially in terms of the forest science.

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
