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Q7. <b>Country</b>	Australia
Q8. <b>Stakeholder type</b>	Individual
Q9. <b>Stakeholder type - Other</b>	not answered
Q10. <b>Stakeholder type - Staff</b>	not answered
Q11. <b>Organisation name</b>	not answered
Q12. <b>What is your preferred method of contact?</b>	Email
Q13. <b>Would you like to receive further information and updates on IFOA and forestry matters?</b>	Yes
Q14. <b>Can the EPA make your submission public?</b>	Yes
Q15. <b>Have you previously engaged with the EPA on forestry issues?</b>	not answered

**Q16. What parts of the draft Coastal IFOA are most important to you? Why?**

The extent to which the current IFOA protects environmental values is not monitored. -if at all. The current proposed changes are flawed and should be rejected until this real data can be collected and evaluated. The most important part of any IFOA is that ensuring that environmental values are actually protected;

**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 primary aim of the draft IFOA seems to be to maximise the supply of native forest to the extreme detriment of the forest environment. Hence the IFOA lacks parts which would have a positive outcome on the management of environmental values.

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**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 Comprehensive Regional Assessment process identified a range of protection requirements for habitat, species, and forest types. The identified scientific reservation targets were in many cases not met. ESFM and its enabling instruments were to ensure - despite the lack of permanent reservation and the known impacts of logging – that conservation values were to be protected. To now seek to remove a range of carefully designed regulations, with no substantive efforts to increase reservation outcomes to achieve the CRA identified ecologically-required protections, is a backsliding on what was already a compromise approach to the management of conservation values in logged forests.

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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)?**

A landscape approach that serves merely to reduce important prescriptions, save money, reduce compliance costs and increase wood volume availability, whilst counting already extant protection outcomes in reserves as sufficient to deliver conservation objectives is a fundamentally flawed approach.

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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?**

There is no such thing as a sustainable timber industry in the few remaining old growth native forests. Expert advice has confirmed that both objectives -supplying timber commitments and managing environmental values cannot both be met. The IFOA is apparently designed to ensure the timber supply with the accompanying destruction of the forest ecosystem.

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**Q21. General comments**

The removal of all harvesting system prescriptions is a quite extraordinary change. There has been significant work to identify appropriate forms of harvesting in different forest types. To leave the harvest type entirely at the discretion of the forest manager dramatically increases the risk that ecological values will be damaged due to overlyintensive harvesting or logging that is inappropriate to a site or forest type.

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**Q22. Attach your supporting documents (Document 1)** not answered

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**Q23. Attach your supporting documents (Document 2)** not answered

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**Q24. Attach your supporting documents (Document 3)** not answered

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