



Respondent No: 220

Login: Anonymous

Email: n/a

Responded At: Jun 29, 2018 09:48:08 am

Last Seen: Jun 29, 2018 09:48:08 am

IP Address: n/a

- Q1. **First name** Kevin
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- Q2. **Last name** Williams
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- Q3. **Phone** [REDACTED]
- Q4. **Mobile** [REDACTED]
- Q5. **Email** [REDACTED]
- Q6. **Postcode** [REDACTED]
- Q7. **Country** Australia
- Q8. **Stakeholder type** Individual
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** NA
- 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?** No
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**
AS attached
- 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?**
AS attached

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?

As attached

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)?

AS attached

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

AS attached

Q21. General comments

As attached

Q22. Attach your supporting documents (Document 1)

[REDACTED]
[REDACTED]
[REDACTED]

Q23. Attach your supporting documents (Document 2)

not answered

Q24. Attach your supporting documents (Document 3)

not answered

To Whom it May Concern

We wish to make a submission opposing the proposed Coastal Integrated Forest Operations on the following grounds and matters.

Intensification of Logging

Clear felling of large areas of forest is indiscriminate, degrades the soil and causes erosion. In recognition of this, the legal limit for coups of clear felling is 0.25 ha. Disregarding these concerns, the NSW government now proposes:

- A 140,000 hectare intensive logging zone, extending all the way along the Mid North Coast from Taree to Grafton.
- Size of clear felling coupes increased by more than 200 percent from from 0.25 ha. 50 to 80 ha.
- Scrapping of survey requirements for koalas and other species which are currently protected.

This intensification will have many local impacts as well including:

- Increased traffic from logging trucks impacting on local communities. On our non-sealed road, they already start from 4.30am to 5am. Any such development on private land such as for a quarry would give the community an opportunity to comment on such matters and conditions to be set if approved.
- Increased number of trucks will place additional demands on the costs and maintenance of local roads, an issue the local Councils in the affected areas are already struggling with
- Wholesale clearance will have visual impacts and although it is recognised that State Forests are not National Parks to the visitor it is the visual impact rather than who owns the land that will create the impression and view they take from these regions. This is contrary to the emphasis that is given to Nature Tourism (indeed even the expanded tourism role of State Forests) that is now a priority in both the Destination North Coast Tourism Plan and local Council Destinations Management Plans.

Removal of Protections for Flora and Fauna

Areas, which have been protected for the last 20 years, providing shelter and habitat for a range of protected animals and endangered species that live there, will now be opened for logging. These areas, which include all the areas which are identified to date as high-value habitat areas used by koalas.

The proposal removes the legal protection of 326 plant species and a reduction of protection of 32 plants. Only 77 species and populations of threatened plants will retain their protection status.

Protection of Koala Habitats

North-Coast koala populations have declined by 50% over the past 15-20 years. While the government proclaims to be taking steps to remedy this such actions are very limited in scale and do not meet the much broader support for the development of a Great Koala National Park not only from communities across the Mid North Coast but others such as Bellingen Shire Council and the National Parks Association of NSW. This government action now proposes:

- Areas, which have been protected for the last 20 years, providing shelter and habitat for a range of protected animals and endangered species that live there, will now be opened for logging.
- These areas, which include all the areas which are identified to date as high-value habitat areas used by koalas, will now be opened for logging.
- Requirements to physically check for the presence of koalas before commencing with logging will be scrapped.

This means that areas with active koala populations now can and will be logged.

Removal of Protection for Water Courses

Water streams in upper catchment areas are currently protected by a buffer of just 10 metres, measured from the top of the stream bank to the soil disturbing logging activities. This 10 m buffer serves to reduce silt pollution and degradation of the stream, but there is evidence suggesting that a buffer of 30 m is required to offer effective protection against silt pollution and degradation.

The NSW Government now proposes: to reduce the buffer to 5 metres and to make it even worse to measure that 5 metres from the middle of any watercourse.

Lack of Public Consultation

Our local MP noted in local press that: "Independently facilitated information sessions involving representatives of all the relevant state agencies, the Forestry Corporation and the Natural Resources Commission have been held along the entire NSW coast to ensure that well informed submissions are received." If this has been correctly reported then the most obvious comment would be that no mention is made of consultation with the public and affected communities.

As a person who works online and making many submissions trying to find information on this matter and the degree of public consultation has been appalling and far below the standards of other government department processes and consultation.

Regards

Kevin Williams & JA Stewart

