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- Q1. **First name** David
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- 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** Landmark Ecological Services
- 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?**
please refer to attached submission
- 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?**
please refer to attached submission

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?

please refer to attached submission

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)?

please refer to attached submission

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

no, and there is no possibility of these changes resulting in a sustainable timber industry

Q21. General comments

please refer to attached submission

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



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DAVID MILLEDGE | DIRECTOR

29 June 2018

COMMENTS ON THE PROPOSED IFOA REMAKE - IMPLICATIONS FOR VERTEBRATE FAUNA AND PARTICULARLY FOR THREATENED SPECIES

As a wildlife ecologist who has spent the past 40 years conducting surveys and research in NSW forests and who was personally involved in negotiating logging prescriptions for the initial IFOA, I find the proposed IFOA remake extremely disappointing.

NSW's public forests are an intrinsic part of the State's biodiversity reserve system and are crucially important as:

- major refuges for biodiversity;
- supporting core populations of threatened species;
- maintaining genetic diversity in plant and animal populations; and
- expanding, buffering and linking the State's formal reserve system.

Increased logging intensity

Overall, the IFOA remake will result in substantially increased logging intensity throughout north coast forests, particularly in the regrowth zone.

In the non-regrowth zone, increased logging intensity combined with the failed silvicultural practice of attempting maximum disturbance for regeneration will result in an acceleration of the problems already characterising foothill and escarpment moist and wet forests. These include a proliferation of vines and weeds, particularly Lantana, and expansion of Bell Miner-associated dieback.

In the regrowth zone where large clear-falls are proposed, stands will rapidly become even-aged or de facto plantations, lacking most of the habitat attributes necessary to support diverse assemblages of forest-dependent species.

This simplification of forest structural and floristic diversity will result in the phenomenon known as ecological truncation, where populations of the largest and most specialised species will suffer local extinctions. This will result in populations of species including the Sooty and Masked Owls and Yellow-bellied and Greater Gliders becoming lost from timber production forests.

Species crucial to ecosystem functioning, such as the mycophagous Rufous Bettong and Long-nosed Potoroo, together with apex predators including the Powerful Owl and Spotted-tailed Quoll will also be lost, resulting in trophic degradation.

“Multi-scale landscape” planning approach

The “multi-scale landscape” approach to forest harvest planning, as proposed in the IFOA remake, is fatally flawed because it assumes that biodiversity values are homogeneously distributed across the forested landscape. It is one of the basic principles of vertebrate ecology that populations of uncommon and rare species, and particularly threatened species (*BC Act 2016*) have heterogeneous distributions and their conservation cannot be catered for by this so-called multi-scale landscape approach.

A previous attempt by the Forestry Corporation at landscape-scale conservation, a likely precursor to the proposed strategy, involved “large owl landscapes”. However, the applications of this prescription were never monitored and appear unlikely to have been effective as the “landscapes” were selected on the basis of areas not required for logging at a particular time.

Logging of old-growth forest

Logging of functional old-growth forest appears likely to increase exponentially with the IFOA remake, facilitated by redefinition and remapping, applying a highly restrictive interpretation of what constitutes old-growth. It is estimated that more than 70% of old-growth forest protected under previous IFOA rules will now be open to logging.

This will have severe detrimental impacts on biodiversity values as well as having damaging hydrological and erosional effects. Hollow-dependent fauna requiring large old trees for nest, roost and den sites and only able to use surrounding younger forests because of the existence of old-growth refuges will disappear from many forests. Species likely to be adversely affected by this proposal include the large forest owls, large gliders and a number of microbats such as the Eastern False Pipistrelle and Greater Broad-nosed Bat.

The loss will be aggravated by the proposal to preclude the previous requirement of purposely setting aside mature trees as old-growth recruits and is likely to precipitate a crisis in the availability of large hollow-bearing trees in approximately 100 years.

This approach taken by the IFOA remake appears to completely abandon the State government's previous commitment to ecologically sustainable development.

Loss of buffers to minor streams

The proposal to substantially reduce the width of stream buffers, particularly to streams with catchments of less than 20 ha, will put at risk threatened frogs such as Fleay's Barred Frog, that are known to forage on the forest floor up to 30 m from stream banks. Decreasing riparian buffers in these situations to 5 m either side of a stream course will effectively remove any protection for species dependent on healthy aquatic habitats. Other frogs likely to be adversely affected by this loss are species in the *Philoria* genus, including Pugh's Mountain Frog and the Sphagnum Frog.

Where under the previous IFOA, buffer widths were increased if records of the threatened barred frogs or Golden-tipped Bat or Southern Myotis were known in the vicinity, these protections are completely abolished with the remake. No justification is provided for this change, despite the Forestry Corporation having undertaken research on these species over many years and acknowledging that buffers are beneficial for their conservation.

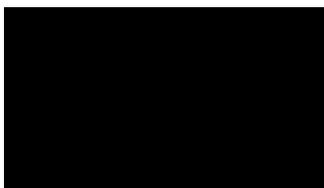
Removal of pre-logging surveys and species-specific habitat protection prescriptions

The IFOA remake eliminates the need to undertake pre-logging surveys for threatened species, which if adequately conducted provide the foundation for implementing the most effective protections for these species and their habitats. The remake states that such surveys were costly and ineffective but this has only been because the Forestry Corporation did not resource and undertake them satisfactorily.

The prescriptions for protecting habitat or mitigating forestry impacts on habitat that were triggered by the results of these surveys are also mostly abolished under the remake. However, the arguments used to justify their revocation have no scientific basis as the prescriptions were never monitored for suitability of application or performance.

The emphasis placed on the Koala in the remake, although not without some merit, is anthropocentric and unscientific as Koalas are not good indicators of biodiversity or healthy ecosystems. However, the remake offers no reasons for not treating all threatened species with the same level of scrutiny as this species.

My understanding of the effects of the IFOA remake, if implemented in its current form, will be to cause major losses in biodiversity, particularly in relation to threatened species, and in a collapse of ecological functioning throughout the north coast's public forests. The simplification and degradation of the forest structure and floristics emanating from such a substantial increase in logging intensity will have significant adverse consequences, resulting in localised population extinctions of threatened and other "at risk" species. It will compromise many of the forests' primary functions in supplying ecosystem services together with insurance against future stochastic events such as global warming.



David Milledge