



Make a submission – Form

1. What parts of the draft Coastal IFOA are most important to you? Why?
2. 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?
3. 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?
4. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?
5. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?
6. General comments

1. Informal Reserves and Excluded Areas.

The Minister's promises, reflected in the EPA (2015) promise that "*Existing RFA commitments to the protection of old growth, rainforest, rare non-commercial forest types and the Forest Management Zone (FMZ) layer will be maintained unchanged*" must be honoured. There must be no opening up of Informal Reserves and/or Special Management Zones for logging.

All existing owl landscape areas must be retained and not be allowed to be remapped to move them to areas logged over the past 20 years.

2. Old growth and Rainforest

The intent to log oldgrowth forest and rainforest protected as part of the CAR reserve system for the past 20 years is strongly objected to. The justification for this is fraudulent as the evidence is that there is no reduction in committed timber volumes to justify the need to log currently mapped old growth forest and rainforest.

The revised criteria and methodology being used to remap old growth and rainforest out of existence is inconsistent with the original criteria and methodology applied in the Comprehensive Regional Assessment and the application of these reduced criteria is objected to. All old growth and rainforest must be assessed based on the full suite of environmental values and reserve targets they contribute to the Comprehensive, Adequate and Representative reserve system, not just old growth targets.

3. Stream Buffers

Adequate stream buffers around the headwaters of our river systems are vital for their health. The scientific evidence is buffers on headwater streams should be increased to 30m. Riparian buffers in the vicinity of threatened species who depend on this habitat must be expanded to at least this width.

The proposal to reduce buffers in headwater catchments down to 5m is strongly opposed. All riparian buffers, and riparian habitat for threatened species, protected over the past 20 years, is vital habitat and must remain protected.

The IFOA must be altered to at least meet the promise that 10m riparian buffers will be implemented on all streams in the intensive logging zone in catchments less than 20ha.



4. Tree Retention

The intent to reduce hollow-bearing tree retention requirements and the removal of requirements for recruitment trees is strongly objected to. The aim should be to restore hollow-bearing trees throughout the forests as quickly as possible, to this end the aim should be to

- retain all hollow-bearing trees throughout forests, and retain the next largest trees to increase the retention rate up to at least 5 of the largest and healthiest trees per hectare where insufficient hollow-bearing trees are available.
- retain two sound and healthy mature/late mature recruitment trees for every hollow-bearing tree retained.

The size thresholds for protecting giant trees are too large. All trees greater than or equal to one metre diameter should be retained and protected as a matter of urgency.

The removal of the need to protect eucalypt feed trees is opposed. The requirement to protect sound and healthy mature/late mature individuals of the most important nectar producing eucalypt species must be restored, with at least 5 per hectare protected throughout forests and the protection of all mature and late mature eucalypt feed trees within potential habitat of Regent Honeyeaters and Swift Parrots.

5. Threatened Species

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.

As a matter of urgency the effectiveness of prescriptions need to be monitored and adjusted to achieve explicit performance criteria.

6. Koalas

The removal of the need to look for and protect high quality Koala habitat is strongly objected to. The identification and exclusion of logging from occupied core Koala habitat across all land tenures has to be the highest priority if the ongoing decline in Koalas is to be halted. Surveys to identify occupied high quality Koala habitat needs to be undertaken by independent experts with the full extent of resident Koala home ranges excluded from logging.

In order to reverse the decline it is essential that protection be extended to previously occupied high quality habitat, habitat linkages between core habitat, and present and future climate refuges.

Searches for all trees utilised by Koalas (with observations of Koalas, Koala scats and/or distinctive Koala scratch marks) need to be undertaken ahead of logging, with all utilised trees protected.

7. Bell Miner Associated Dieback

The EPA must heed the evidence and recognise that logging is a primary cause of Bell Miner Associated Dieback.

Logging must be excluded from all forests affected by, and susceptible to, Bell Miner Associated Dieback. Urgent rehabilitation must be required for all forest areas affected by Bell Miner Associated Dieback.

Areas affected by Bell Miner Associated Dieback must be excluded from the FRAMES timber modelling.



8. Logging Intensity

The proposed 140,000ha North Coast Intensive Zone is strongly opposed. Clear felling must not be allowed.

The proposal to increase logging intensity in the rest of the forests, where the minimal basal area required to be retained is 10m² ha in the "regrowth" zone and 12m² ha in the non-regrowth zone is strenuously opposed.

In accordance with the current rules the minimum basal area retention must be increased to at least 20 m²/ha across all forests.

9. Logging Volumes

It is reprehensible that NSW Government agencies have intentionally and secretly inflated the current wood commitments from north east NSW in order to fraudulently justify slashing environmental protections, most outrageously the logging of old growth forest and rainforest in the CAR reserve system.

Based on current commitments there is no justification for logging old growth and rainforest, and many other environmental wind-backs can be restored. The IFOA must be renegotiated based on current timber commitments with the restoration of environmental protections.

An inquiry needs to be held into why NSW Government agencies were allowed to collude to fraudulently use increased supply volumes to justify the massive wind-back in environmental protections.

How can the NSW Government justify spending \$8.55 million in 2014 to buy back 50,000 m³ per annum of high quality sawlogs, claiming it was necessary to reduce cutting rates down to a long-term sustainable level, and now claim that cutting rates can be increased and still be sustainable? Will Boral be asked to pay back the \$8.55 million?

It is outrageous that the IFOA is claiming that 269,000 m³ per annum of large high quality sawlogs can be logged from north-east NSW, this must be reduced down to, at most, the current supply level of large and small high quality sawlogs from native forests and hardwood plantations.

I strongly object to any new Wood Supply Agreements, including the proposed 416,851 tonnes per annum of low quality sawlogs and residual logs from north east NSW.