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Dear Sir/Madam

I write as a koala conservationist of nearly 20 years and as a citizen who holds grave concerns for the future of our forests, particularly those with which I am most familiar here in the Northern Rivers Region, to object to the Draft Coastal IFOA.

While I concede the inefficiencies and ineffectiveness of the existing IFOAs, the move to a single IFOA divided into zones based on different harvesting practices with specific limits supported by 'clear and enforceable conditions' and 'comprehensive monitoring evaluation and review' to maintain environmental values, is no more credible

Cutting to the chase, the wrangling that has gone on for years over forestry law and policy, not to mention the Forestry Corporation's blatantly sustained disregard to compliance and the EPA's ineffectual capacity for imposing penalties, has sapped any confidence I have in the way our forests have been managed under the current IFOAs or will be managed under a new IFOA. Furthermore, I believe that the key decisions are already made, rendering this 'consultation' meaningless.

The NSW Government has promised on numerous occasions that no loss of timber and no decrease in environmental values would result from the IFOA remake. Better qualified people than me have pointed out the incompatibility of the Government's policy position. Overall, the Draft IFOA appears to be nothing more than a vehicle for obtaining as much wood in as short a timeframe as possible, dressed up with gobbledegook like 'multi-scale landscape approach' and 'outcome-focused regulation'.

In regard to koalas in our part of NSW, the key change is to move away from searching for koalas by way of pre-logging surveys (a requirement that Forestry Corporation often could not or would not adequately apply) to a predictive model with prescriptions. Some 200ha of previously identified Koala High Use Areas (HUAs) are to be carried over, where they have not since been logged, though these are not electronically recorded and are therefore largely unknown. The new IFOA also proposes that wildlife habitat clumps and tree retention clumps consider koala habitat.

The Chief Scientist & Engineer's Report of the Independent Review into the Decline of Koala Populations in Key Areas of NSW (2016) had quite a lot to say about the impacts of logging (public native forestry harvesting) and the koala protections in place noting, "Little data is available to assess the effectiveness of these [existing] prescriptions in mitigating impacts on koala populations." (p.17)

The report also commented on the change in silvicultural practices applied on the North Coast from around 2007 when a more intensive form of harvesting emerged referred to as regeneration harvesting. (ibid).

The Chief Scientist recommended commencement of a priority research project within six months of receipt of her report, to better understand how koalas are responding to regeneration harvesting forestry operations on the mid-north coast of NSW. The project was to assess the effectiveness of current and proposed prescriptions designed to mitigate the impacts of forestry operations on koalas in these areas. (p.38)

As far as I am aware this project has not been undertaken. Indeed, the recommendation has been entirely ignored and regardless of the impact of 'regeneration harvesting' on koalas, the regime is to be extended in the new IFOA.

Putting this reprehensible proposal to one side, reliance on contemporary koala mapping and approaches to koala management (potential for koalas and their habitat rather than koala presence) might sound like a reasonable strategy on which to base prescriptions. After all koalas are a landscape species requiring landscape-scale protection, however they also need site specific management which will protect the habitat used by individual animals.

The OEH likelihood map and the DPI habitat model used together set protections, i.e. tree retention rates based on habitat quality. The higher prescription (when both models return 'high' values) is the retention of 10 feed trees of minimum 20cm DBH per hectare in each map cell (6ha). The lower prescription is retention of 5 feed trees of 20cm DBH per hectare if mapped 'moderate habitat' cells cover 25% of the net harvestable area.

There are numerous problems with this approach including koalas' preference for large trees of specific species in the size range 30-80cm DBH and mature forests. Trees of just 20cm DBH are sub-optimal habitat and 80-90% of them will not be used; there is no requirement to preferentially select trees with evidence of koala use; modelling koala habitat is not an accurate predictor of koala occurrence because of the influence of previous disturbance and socio-biology; and 43% of the modelled highest quality habitat is in the proposed mid-north coast intensive harvesting zone and much of it has already been intensively logged.

On the available information then, the proposed Coastal IFOA will, more likely than not, have an unacceptable impact on koalas in northern NSW. In my view it is little more than an experiment providing no certainty that koalas and their habitat will be adequately conserved and managed, nor that individual koalas and their preferred habitat will be protected. Monitoring and adaptive management, even if they are done well, (and it is a big 'if'), will not *prevent* impacts. The monitoring reveals a problem, triggering a review to determine the appropriate adaptive management strategy to solve it, but it is too late for the koala(s) at the heart of the problem. What's more the loss of individuals and habitat can be expected to flow on, impacting the sub-population and eventually the mega-population.

One could go on and on, referring to, for example, the ignored concerns expressed by the Threatened Species Expert Panel, but what would be the point? The Draft Coastal IFOA's purpose is clearly to deliver for the logging industry.

The lack of transparency around the economic exploitation of our public forests (yes, they are after all a significant asset of the people) at the expense of their health, their capacity to support wildlife and water quality is nothing less than shameful. The tax-payer is already subsidising a rapacious and unsustainable timber industry to the hilt. The tragedy is that the outcomes of these appalling policies will not only continue to plague us, but countless generations to come.

Yours sincerely

Lorraine Vass
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