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Q1. First name [REDACTED]

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Q3. Phone not answered

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 not answered

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, but anonymous

**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?

The whole of the draft Coastal IFOA is important to me. I am a landowner and ratepayer in the North Coast of NSW. I am not aligned with any political party and I vote. I live here because of the environment and the wildlife. I have seen the decline of many species even in the short time that I have lived in the region (9 years). I am very worried about the erosion of environmental protections in the draft Coastal IFOA and the impact on our local environment, our koalas and our wildlife in general.

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 draft Coastal IFOA provides for the mapping of streams and threatened species etc. which would seem on the face of it to be a valuable contribution to environmental values. I assumed that the purpose of undertaking such mapping would be to ensure that streams and threatened species would be excluded from timber harvesting. But I am alarmed to note statements in the executive summary of the IFOA, which make it clear that timber harvesting will be prioritised over any environmental concerns and “to ensure this increased protection does not impact on the... supply of timber”... buffer zones around streams will be reduced from 10m to 5m. In spite of any mapping of streams. In spite of the fact that the same Government has just recently funded a research project in the Northern Rivers into the endangered Fleays Barred Frog, which resides only in close proximity to streams. It is unclear to me what the Government proposes to protect streams and threatened species from, if not from logging. I am left with the inevitable conclusion that the statements regarding environmental protections are disingenuous if not outright misleading to the public and designed to prevent people from investigating the details of the draft IFOA. Similarly, the draft Coastal IFOA proposes increased penalties for contraventions of the regulations, which on the face of it would seem a welcome strengthening of environmental protections. However, given the changes to the environmental protections as set out in detail below, protection is actually weakened since significant environmental damage can and will occur without it amounting to a contravention of the IFOA. I am left with the conclusion that the draft Coastal IFOA will have no positive outcomes on the management of environmental values or the production of sustainable timber. Despite numerous statements throughout the document, the website and media releases referring to new ‘protections’ and ‘limits’, most of the actual protections for sustainability and threatened species have been stripped out of the new IFOA framework. Forestry practices under the existing RFAs have already proven to be environmentally unsustainable. The 50% reduction in the North Coast koala population in the past 20 years is stark evidence of this. If the industry is not environmentally sustainable then nor is it economically sustainable in the long term. The remaining native forests cannot withstand a further 20 years of logging under current practices, let alone under the proposed new IFOA framework. Our native forests and wildlife are already on the brink of extinction. Once biodiversity is lost it is gone forever. It is irresponsible of Government to treat native forests purely as a resource to exploit without acknowledging their larger purpose in our environment and our lives and ensuring their protection and restoration.

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 draft IFOA seeks to repeal the provisions that make forestry agreements prerequisites for IFOA. This has the potential to open up significantly larger areas to logging. Given that Regional Forest Agreements were originally made on the basis of significant mapping efforts of old growth and significant forests, to ensure these were not open to logging, the purpose of the proposed changes appears to be to reduce environmental protections and create access to areas that were previously excluded from logging. The draft IFOA proposes to consolidate the currently separate licenses related to harming animals, plants, and fish or for polluting waters, replacing them with a single environmental licence to be issued to loggers. I am concerned that this will reduce the specific protections required for different ecosystems and species and result in less protections overall.

Logging intensity: the draft IFOA proposes 4 different types of logging: selective, intensive, mixed intensity and alternate coupe. Yet, even for the least intensive kind of logging, 'selective logging', this IFOA only requires 10 square meters of trees be retained per hectare logged, which means that only 0.1% of the total area – only 10 square meters out of 10 thousand - is required to be left with trees on it. There is no possible way that this can be considered environmentally responsible and is in effect clear felling in all but name.

Wildlife clumps: the draft IFOA states that 'wildlife clumps' will have to be retained to protect threatened species. In practice, this means that animal will be marooned in small clumps of habitat as the rest of the forest is felled around them. Again, there is no possible way that this can be considered to be environmentally sustainable as wildlife does not exist in isolated clumps or in zoo-like reserves. The wildlife cannot survive in such circumstances and this approach will only contribute to further species extinction, rather than species preservation.

Habitat hollows: the draft Coastal IFOA provides that only 5 hollow bearing trees have to be retained per hectare. These important habitat features will be essentially useless if all the trees around them are felled. There is already a significant shortage of hollow bearing trees in our native forests and it takes many years for such hollows to form. The shortage of hollows is already resulting in issues with wildlife such as possums, gliders and bats being forced to find homes inside buildings, and has prompted all wildlife groups in the area to call for people to install man-made hollow habitat wherever they can. ALL hollow bearing trees should be preserved if our wildlife species are to survive.

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)?

I believe it will be highly effective at destroying our environment and our koala populations and threatened species by opening up new and large areas for logging that were previously unavailable, and prevent Government from having to do the real and the difficult work of transitioning the forest industry from unsustainable native forest harvesting to a sustainable plantation forest industry.

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

I have already addressed this in my points above. Overall, NO I do not believe the draft Coastal IFOA will be effective in managing environmental values and a sustainable timber industry and I AM STRONGLY OPPOSED TO IT.

Q21. General comments

The media release by Ministers Upton and Toole dated 15th May 2018 is significantly misleading and I am very concerned that our elected representatives are prepared to treat the public with such disregard. The document refers to strengthening environmental standards as well as providing long term security of wood supply. In fact, the draft IFOA will achieve neither of these things and will erode what environmental protections currently exist. The combination of the draft Coastal IFOA together with the transfer of responsibility for native forests from the Department of the Environment to the Department of Primary Industry spells disaster for our forests, our koalas and our threatened species. Not only is the Government proposing to erode significant environmental protection measures, it has put the fox in charge of the chickens and is now trying to convince us that the fox will do a wonderful job of protecting them. I remain unconvinced and very concerned and repeat that I STRONGLY OPPOSE the draft Coastal IFOA.

Q22. Attach your supporting documents (Document not answered

1)

Q23. Attach your supporting documents (Document not answered

2)

Q24. Attach your supporting documents (Document not answered

3)
