



**Respondent No:** 498

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- Q1. **First name** [REDACTED]
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- Q6. **Postcode** [REDACTED]
- Q7. **Country** not answered
- 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?** Yes

**Q16. What parts of the draft Coastal IFOA are most important to you? Why?**

The halt to the destructive hardwood forestry operations that have resulted in losses being made by the Hardwood Division of FCNSW. Protection of riparian habitats with no diminishing of their extent. Compliance, monitoring and fines that compel compliance.

**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?**

I do not feel I can comment in any knowledgeable way on this point. The overall plan seems to me to put too much interpretative license on those gathering wood, the talk of outcome based operations suggests to me that only a 'reactionary' approach to any environmental problems that crop up will be the order of the day and gives me little hope for the responsible management of forests that I treasure and enjoy as the major part of my recreational time.

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**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?**

**Stream Buffers** Adequate stream buffers around the headwaters of our river systems are vital for their health. The read the scientific evidence as suggesting buffers on headwater streams should be increased to 30m and 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 I find ludicrous. All riparian buffers, and riparian habitat for threatened species, protected over the past 20years, is vital habitat and must remain protected. I want the IFOA 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.

**Tree Retention** The intent to reduce hollow-bearing tree retention requirements and the removal of requirements for recruitment trees I strongly object 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 threatened bird species.

**Bell Miner Associated Dieback** There is recognition 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 should logically be excluded from the FRAMES timber modelling.

**Koalas** The removal of the need to look for and protect high quality Koala habitat I find objectionable. 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.

**Oldgrowth and Rainforest** The revised criteria and methodology being used to remap oldgrowth and rainforest 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 oldgrowth 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 oldgrowth targets. Compliance The lack of specificity on how compliance will be achieved is disturbing to me. I would far prefer to see a plan and committed money up front before I could agree that any good ill come from the IFOA. Their poor history of compliance is a major concern of mine.

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**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 have no background to make a comment on this

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

It seems to me there is a lack of definition in the draft document and I feel there is too much interpretation to be allowed to those with a vested interest. I feel melancholy about the future of forests after considering this document

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**Q21. General comments**

Thanks for allowing me to comment

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**Q22. Attach your supporting documents (Document 1)** not answered

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**Q23. Attach your supporting documents (Document 2)** not answered

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**Q24. Attach your supporting documents (Document 3)** not answered

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