



**Respondent No:** 515

**Login:** Anonymous

**Email:** n/a

**Responded At:** Jul 12, 2018 08:07:42 am

**Last Seen:** Jul 12, 2018 08:07:42 am

**IP Address:** n/a

- Q1. **First name** [REDACTED]
- Q2. **Last name** [REDACTED]
- Q3. **Phone** not answered
- Q4. **Mobile** [REDACTED]
- Q5. **Email** [REDACTED]
- Q6. **Postcode** [REDACTED]
- Q7. **Country** australia
- Q8. **Stakeholder type** Industry group
- Q9. **Stakeholder type - Other**  
not answered
- Q10. **Stakeholder type - Staff**  
not answered
- Q11. **Organisation name** [REDACTED]
- 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 additional tec mapping, old growth and koala trees need to be balanced so we don't lose more resource. forestry corporation will not mark streams or boundaries and the epa have increased penalties. there is no written guidance on gps error. the logging contractor will have to put a gps error buffer on each boundary resulting in lost resource.

**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?**

silviculture will be easier to achieve from industry side. clumps are easier to protect. use of existing tracks is common sense. two boundary rules are easier for everyone.

---

**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?**

until the epa clarify in writing what epa discretion is it will never work. both government agencies have offered penalties to the logging contractor with a reduction of boundary marking on forest corp side and stiff penalties on epa side. what choice does the tree harvester operator have? forest corp want every tree on the boundary. epa will fine the operator and logging contractor if they cross the line. the line is determined by gps which has up to 30 metres of inaccuracy on different days and pre removal of canopy against post harvest when audits are carried out ! forest corporation need to mark each boundary with paint and the operator can cut to the hard line. epa need to audit boundaries before paint or ribbons are faded and epa can fine forest corp if the line is wrong. epa can fine the operator and contractor if they blatantly ignore the marked line. if forest corp refuse to mark boundaries the contractor can only work outside the gps error area. a large amount of wood will not be harvested.

---

**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)?**

should give a good outcome

---

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

yes it gives protection where needed but if it reverses some poorly mapped old growth and rainforest areas obviously done in the past in previous agreements without science or proof.

---

**Q21. General comments**

from a logging contractor point of view forest corp are walking away from there responsibility as a manager by not marking the boundaries... the epa need to clarify in writing discretion. gps has up to 30 metres of variation and is to unreliable when epa have no tolerance for crossing the line and forest corp expect 100% of net harvest area to be cut but are unwilling to draw that line in the sand themselves. this will need to be resolved before implementation. protection to retained trees needs to be reduced to 2 metres from tree as this will give a better enviromental outcome in some cases. to make a best practice outcome and remove the need for significant side cutting in some cases 104.4 needs to be amended to allow earthworks in ground protection zone followed by stabilisation.

---

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

---

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

---

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

---