



We are now accepting email submissions. The form below must be filled out and attached in an email and sent to [ifoa.remake@epa.nsw.gov.au](mailto:ifoa.remake@epa.nsw.gov.au) If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.

**Make a submission – Contact Details**

First Name\*: [REDACTED]

Last Name\*: [REDACTED]

Phone:

Mobile\*: [REDACTED]

Email\*: [REDACTED]

Postcode\*: [REDACTED]

Country\*: Australia

Stakeholder type (circle)\*:

	Individual	
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Other, please specify:

Organisation name:

What is your preferred contact method (circle): Mobile, Email or phone?

email

Would you like to receive further information and updates on IFOA and forestry matters?

Yes

Can the EPA make your submission public\* (circle)?

Yes, but anonymous

Have you previously engaged with the EPA on forestry issues? Yes



### Make a submission – Form

#### 1. What parts of the draft Coastal IFOA are most important to you? Why?

This is a bit like asking what part of the traffic rules are important to me. I'm sure that the logging industry will have lots to say in this section (because it is another gift to them) but environmentalists will find it a challenge.

What is important to us is the protection of our natural heritage which, through changes to IFOA being proposed, is being recklessly degraded at public cost to reward a handful of contractors.

#### 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?

I would be tempted to say that there could be support for the widening of some stream beds but I won't because we know that in the pursuit of "balance" - code for exploitation - there will be a massive downside with the halving of stream bed reserves. The trade offs - like "off sets" in other wholesale changes to land clearing legislation - are so imbalanced (and with little or no long term accountability), they are a farce. If it happened in other countries people would say, "That's obviously corruption."

We know from satellite imagery that the rate of land clearing has rapidly increased in the pursuit of "balance" in land management practices and legislation. That's on the government.

#### 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? The draft is said to:

" . . . improve the clarity, transparency and enforceability of the updated IFOA conditions and better work to balance environmental outcomes and timber production."

but in reality we know the key reason why the IFOA are updated. The industry is running out of saw logs. The Natural Resource Commission indicates that saw logs cannot be supplied. In the past the Auditor-General has stated that trees are being cut down faster than they are growing. These are pretty straightforward statements.

Before all the wholesale changes to the proposed roll over of the RFAs and IFOA this state government has handed over wood supply to the industry AND waived the right to deny compensation in the event of a shortfall. In short, the state government is writing a blank cheque on logging state forests, hiding information on jobs and losses in the hardwood state forest operations and plowing ahead with business as usual. The cavalier attitude is so blatant. We know that science is not part of the approach because the supposed Minister for the Environment has minimal input and the



government drafts legislation protecting feral animals in a fragile alpine national park, namely protecting brumbies in Kosciusko against all scientific advice. It make no reasonable sense.

There has been open talk from industry and a National Party MP about logging in national parks due to the lack of saw logs. Well, we know where many of the future saw logs went over the last 40 or so years - down the chipper at the mill in Eden and exported overseas.

Really, this IFOA proposal, much of it leaked in an ABC story last year, is the clear admission of failure by the industry and so called professional foresters.

I've met logging surveyers in the Florentine Valley in Tasmania. I was informed that they can't make a profit where they get two metres of rainfall a year and have much more productive soils than they have in southern NSW. We do not have growing conditions like that here. I have lived in the forest for over twenty years and have monitored how little growth there is on dry ridge tops. I remember an old sleeper cutter visiting our forested property at Tathra and telling us how hard it is for the trees to grow. He said that some of our trees were not that thick in the trunk but we would be surprised to know that they were quite old. His insight has been confirmed over the years. At the RFA "consultation" meeting in Eden we were informed by contractors that they re making good money.

Enforceability is a joke because of the cuts to FC jobs to try and look like, not actually be, profitable. FC NSW is making not money out of hardwood operations. It is a drain on the public purse. I believe there are only 6 EPA staff to try and monitor the whole of NSW. We saw this government's effort on enforcing environmental laws on the Murray Darling where the ABC 4 Corners program reported that the unit that found the irrigation infractions was disbanded. Surely this is a matter for ICAC. We know that there have been hundreds of breaches over the last ten years with hardwood logging, long delays in investigation, few convictions, few timely interventions to stop damage and little or no remedial work.

I thought that when the ABC story about halving streamwas leaked it had to be false. It wasn't. This is an outrageous degradation of environmental law.

All the intensive logging targeted at the north coast is a concern. The loss of koala habitat is of great concern due to the pressure on koala populations over the last twenty years.

None of the legislation from the current NSW Government takes climate change seriously. There is supposed to be a whole of government approach to koalas but it is simply not cost effective using money to buy up small and very expensive parcels of land while at the same time propping up a loss making hardwood logging "industry" that is so destructive. It makes no commercial or ecological sense.

The halving of stream bed reserves where the biggest trees are (eg. Eucalyptus Cypelloarpa) and where there is a greater distribution of nesting hollows for arboreal



mammals. Australia's forest fauna is very dependent on tree hollows for nesting and reproduction. Yet, due to logging our forest so intensively

**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)?**

The protection measures are:

Ineffectual.

Under resourced.

Not serious.

If FC NSW was serious about obligations it would have provided the ten year review of the RFAs. It didn't. The public who take a passing interest in forestry have zero confidence in FC NSW. They do not act like a public service. They seem to act like logging brokers.

NSW is still the only state where individuals can't take Forestry Corporation to court. When environmentalists won cases in court the Lib/Nat government just changes legislation to allow exploitation to continue. Again, the EPA is nearly powerless to act.

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

No. Because the whole reason for revisiting this is to prop up the last gasps of this 'industry'. It's not sustainable. Since the chip mill in Eden came into operation it has never been sustainable because YOU CHIPPED YOUR OWN SAW LOGS!

Sawn hardwood products have been undervalued. It's as if the Lib/Nat party thinks it is a human right for people to be able to buy cheap hardwood flooring. The industry is propped up with gifts of money. If FC was listed on the ASX it would be insolvent and liquidated.



The industry was nearly sustainable when it operated with axes and bullock teams (except for the red cedar logging). It had much less impact on the environment than today.

Now three people in mechanical harvesters can clear hectares in less than a day. There are so few jobs but much greater impact on what is left of our public forests.

## 6. General comments

Just like the protection of brumbies, this government goes against every principle of scientific and careful land management in pursuit of the fantasy that this industry is sustainable and that every step must be taken to protect the very small percentage of the workforce involved in hardwood logging. When other industries become non-viable governments let them go with responsibility for re-training the workforce. The hardwood logging industry is no different.

We have sufficient plantation timber for industry needs (according to Dr Judith Ajani). Let's use the forests for carbon storage, water catchment protection and sustainable tourism. Proper environmental accounting by esteemed academics like Professor David Lindenmeyer shows clearly that the trees are worth more in the ground.

I commend the submissions from NPA NSW, Mick Harewood and SERCA for their in depth considerations of why the IFOA remake is inadequate and destructive of our natural heritage.

Native forest logging should be stopped for commercial and ecological reasons. Future generations will look back in years in bewilderment and ponder why this state government was so reckless of the public's natural heritage on behalf of a handful of contractors that are their political supporters. It is scandalous.