



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 If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

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Postcode*: [REDACTED]

Country*: Australia

Stakeholder type (circle)*:

Community group	Local Government	Aboriginal group
Industry group	Other government	Forest user group
Environment group	Individual	Staff

Other, please specify:

Organisation name:

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

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

Yes please

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

Yes No Yes, but anonymous

Have you previously engaged with the EPA on forestry issues?

Yes



Make a submission – Form

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

Nothing about the draft Coastal IFOA appeals. There's much to be concerned about the new Draft Integrated Forest Operations Approvals (IFOA) sadly the NSW Governments short term fix is to reclassify forests, recalibrate the size of trees to be taken, and prey (I think?)

"The changes to the IFOAs are a result of the need to meet the Government's 'dual commitment' to no reduction in wood supply and no erosion of environmental values¹, and to reduce costs. The Natural Resources Commission (NRC) report² that accompanied the proposals stated: *"following analysis of the expected cumulative impact of the agreed and recommended settings, the Commission has determined that it is not possible to meet the Government's commitments around both environmental values and wood supply"*. In addition, a range of external factors outside of the IFOA settings affect the ability to meet the commitments both now and into the future, such as emerging threats from climate change and changing fire regimes."

Source NPA notes on logging IFOA

Despite claiming no change in wood supply it's obvious to the casual observer the opposite will happen. The only winner here is the timber industry, and that will be for a short time only.

Nothing in the Draft Coastal IFOA plan will bring back the monster trees of yesteryear, we've been too greedy. Best illustrated by a program years ago on 4Corners, featuring a Coramba sleeper cutter who proudly spoke of his family history. Over a cuppa he showed photos of his granddaddy dwarfed by a monster tree, that he'd felled, that would've produced a huge number of sleepers such was its diameter.

Out in the forest with the same fella, he proceeded to fell a tree as an example of his sustainable birthing, the vision imbedded in my brain of him standing by the tree that at best should have been a serious cattle yard post which would have yielded a miserable number of sleepers, remains imbedded as an example of how badly mankind has managed Mother Earth.

Yields have been falling for years. It seems overzealous Dept. Staff overestimated potential yields from forests, much the same way they overestimated the potential for irrigation water years ago, with the same disastrous outcome.

1 NSW Forestry Industry Roadmap: https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0005/711851/nsw-forestry-industry-roadmap.pdf

2 Advice on Coastal IFAO remake – Outstanding settings: <http://www.nrc.nsw.gov.au/ifo>

The NRC suggests that 2015 extensions to Wood Supply Agreements may have been ill-advised: *"In mid-2015, the Commission advised government on the risks associated with the species-specific contract and five-year contract extension provided to Boral as part of the high-quality wood supply quota buyback on the North Coast."*



It further states that *“the current [timber] supply issues are expected to increase in future as the impact of climate change places additional stress on native forests, increasing the risks to forest health and both conservation and production objectives”*. In this context, the new IFOA appears to be an effort to obtain as much wood in as short a timeframe as possible

Source NPA notes on logging IFOA

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?

When intention of the draft Coastal IFOA is to drastically weaken the logging rules to remove numerous protections for NSW's threatened species, koalas, oldgrowth & rainforest and waterways there can be no positive outcomes

When the plan prioritises timber extraction to the detriment of the environment and abandons commitments made to the concept of Ecological Sustainable Forest Management under the National Forest Policy Statement (1992).

When the need to search for Koalas is being removed how dare you speak of positive management of environmental values. I find that abhorrent.

It's sad to think that it come to this; Koala prescriptions and Threatened Ecological Community (TEC) protections are identified as causing the timber shortfall requiring intensification of logging. This is false. TECs were never allowed to be logged under the current regime, so citing the EPA's 2016 TEC mapping³ as an impact on timber supplies is misleading. In addition, the koala prescriptions require protection of trees of just 20cm diameter. These trees are not large enough to provide sawlog timber, and therefore their protection cannot be deemed to negatively impact wood supply.

When you speak of reducing headwater stream buffers to 5m it demonstrates a remarkable ignorance of reality, and or a level of arrogance that is unbecoming. Intensive Logging Zones, clear felled 45h at a time, or access tracks situated only 5m from headwater creeks, are disasters waiting to happen. When we get another Coffs Harbour downpour,(1996 an average of 500mm fell in the catchment in a little over 6 hours, and in 2009 an average of 440mm fell in the catchment over 24 hrs) causing horrific environmental and economic damage, a 5m riparian zone won't buffer the creeks from becoming polluted by turbid run-off.

When history shows a 5m riparian zone is not adequate to prevent turbidity and erosion when confronted with the volume and velocity is created by North Coast maximum rainfall events. As project manager of the Orara River Restoration, a National Award Winning Rivercare Project we saw that time and time again on the Orara River, until landholders relented and established 20/25m riparian zones.

3 Assessment of Threatened Ecological Communities of the Coastal Integrated Forestry Operations Approval Region.

<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/forestagreements/assessment-threatened-ecological-communities-coastal-ifo-region-160624.pdf>



When exclusion areas established along numerous streams around records of threatened frogs and other species are to be removed, areas protected for at least 20 years are now open to logging.

Riparian zones provide essential habitat for numerous species, notably frogs, and often contain the largest trees (because they're more fertile sites), the most significant habitat features for threatened species (such as large hollows for gliders and owls) and provide connectivity. These riparian areas are therefore some of the most ecologically important features of forests.

When the changes are a significant reduction in protection, particularly given the panel's view that the riparian areas that have been protected for the last 20 years were often the few areas that still retained habitat elements and structure of a native forest and that it is "important to try to ensure these areas remain protected".

Source NPA notes on logging IFOA

When for north-east NSW the intent is to remove the need to survey for and protect 22 threatened animals (nine mammals, six birds, six frogs and one reptile), with prescriptions only retained for 14 species

When a total of 60 threatened plants will still require limited surveys and limited protection ranging from Roadside Management Plans up to 20m exclusions

When overall 228 threatened plant species (72 per cent) will lose all protection and 28 species (nine per cent) will have reduced protection

....How dare you ask a questions about any positive outcome on the management of environmental values

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

I think that's pretty much covered within my entire submission.

What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?

There's no such thing as permanent, this plan is living proof, and this plan effectively rewards the timber industry. The NRC report states that "*intensive harvesting has been practiced since 2007 but has not previously been codified*". The Forestry Corporation is therefore being rewarded for breaching its social license—and the law. No effort was made to assess the environmental impact of these 11 years of intensive harvesting as a basis upon which to design the new regime, which formalises this practice.



It is not credible to suggest that an escalation of intensity of this magnitude can be driven by anything other than the prioritisation of timber extraction over conservation. This is recognised in several places by the expert panel, for example: *“the intensive harvesting zones are being formally introduced to prop up an unsustainable wood supply arrangement at the expense of the environment”.*

The dramatic intensification of logging in northern NSW under the new rules will result in the rapid homogenisation of large swathes of forests at the landscape and stand scale, with conservation areas concentrated in ‘clumps’ (see Part 2), summarised thus by a member of the expert panel:

“it must be clearly understood that these proposed intensive harvesting practices are effectively clear felling diverse native forest to replace with even age native plantations in a deliberate manner.”

The intensive harvesting will render the 45ha practically useless for hollow-users like gliders for centuries, and the short return time (10 years) to adjacent coupes means forests will be rapidly simplified over large areas. Each Local Landscape Area (= a 1,500ha area of forest) can be cut over in 21 years so specialist species will probably never be able to use harvested parts of LLAs again for denning (due to the lack of hollows), they will likely have limited utility as food resources and they are likely to act as barriers to dispersal (potentially mitigated by the size and configuration of clumps and exclusions, which are not yet clear).

As well as the intensive harvesting zone, increased basal area removal through ‘selective’ harvesting is applicable in all other areas except Eden, which is similar to the intensive zone but with a return time of just ten years. New retention rates (a change from the previous maximum removal) of 10 and 12m²/ha are lower than the old prescription which equated to 10-28m²/ha (with retention increasing with forest productivity). This is a large increase in intensity and is identified by the NRC as a trade-off for the ‘clump budget’ to maintain wood supply.

Source NPA notes on logging IFOA

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

No, The new proposals are to retain all trees greater than 140cm diameter, except for blackbutt and alpine ash where the threshold for retention rises to 160cm. These trees were already required to be protected as hollow-bearing trees. Giant trees are old-growth. Logging trees of >140cm diameter is logging old-growth trees. This indicates clearly the desperation to obtain as much blackbutt as possible, but also indicates that Forestry Corporation anticipates the remapping of old-growth and reduction of headwater buffers to make available giant trees. In fact, all trees >100cm should be protected as a matter of urgency because they are now so rare in production forest landscapes. As one panel member stated in regards the protection of giant trees: *“all giant trees should now be a given as harvesting in public forests is meant to be regeneration harvesting not old growth harvesting. All trees over 100 cm dbh should now be protected regardless of what regimes are adopted”.*



Hollow-bearing trees will be one of the habitat features prioritised for retention in clumps under the new regime, though retention rates will be significantly reduced. Outside clumps, all hollow-bearing trees are to be retained in the intensive zone, and 5/ha in the selective and Eden alternative coupe zones. However, the long-term survival of hollow bearing trees in the intensive and Eden zones is optimistic at best. Most disturbingly however, the new regime requires no retention of recruitment trees (the next generation of hollow-bearing trees) outside of clumps.

The current requirement is to retain one recruitment tree selected from the largest trees for each habitat tree, and even this is inadequate. The practical implication of this is that there will be no trees to replace the remaining hollow-bearing trees when they die. This will mean that hollow bearing trees will disappear over time. Requirements to retain mature eucalypt feed trees are to be removed. In practice this will mean large tracts of the harvest area devoid of nectar resources—important for critically endangered species like swift parrot and regent honeyeater.

The harvest areas are likely to functionally collapse in an ecological sense in the medium term, as their ability to provide resources required by forest species will be almost non-existent.

Source NPA notes on logging IFO

General comments, World Heritage:

The last of our old growth trees/forests merge with and buffer remnants of the Gondwana Rainforests World Heritage Area (WHA) Reserves that are a reminder of the great rainforests that covered the whole of Australia some 180million years ago.

As the most ancient vegetation type in Australia, rainforests are a living laboratory where the ongoing evolution of plant communities can be studied.

The proposed high intensity logging bordering these and other National Park (NP) Reserves will increase cumulative and significant impacts on the Outstanding Universal Value of adjacent World Heritage Areas (WHA) At risk is the biological diversity of the WHA, NP and adjacent forests.

We have an obligation to identify, protect, conserve, present and rehabilitate where appropriate WHAs and their Outstanding Universal Values (OUV) The proposed harvest regimes identified in the draft Coastal IFOAs that are adjacent to any World Heritage Areas, including those properties already identified in the Tentative list for addition to the WHA, will impact the OUV of the WHA.

The proposed timber harvesting in NSW's Draft Integrated Forrestry Operations Approvals (IFOA) adjacent to any World Heritage Areas, (including those properties already identified in the "Tentative List" for addition to the World Heritage Area), will impact the OUV of the World Heritage Area.

Specifically, the draft Coastal IFOA may:

- fragment, isolate or substantially damage habitat important for the conservation of biological diversity in the World Heritage Area itself, and in forests adjacent to the World Heritage Area and,

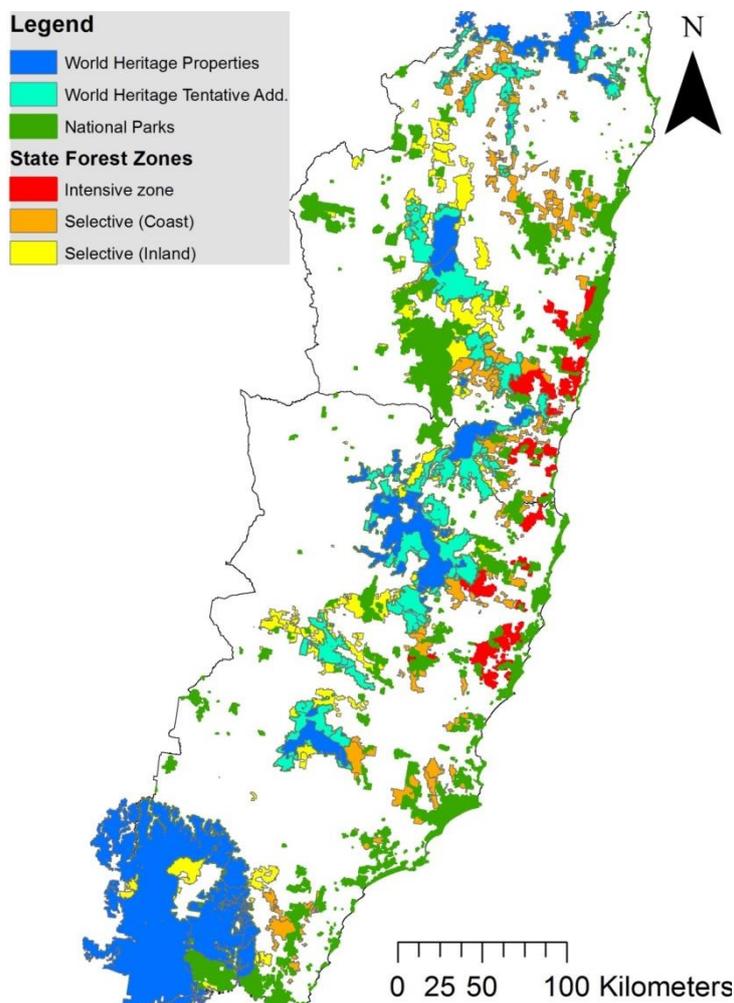


- reduce or modify the diversity of the composition of plant or animal species in forests adjacent to, and within, the World Heritage Area (p.16, Significant Impact Guidelines 1.1, Commonwealth of Australia, 2013).

Australian World Heritage Management Principles, outlined in the EPBC Act, require the protection of those World Heritage properties values. All activities occurring in properties adjacent to the World Heritage Area must be consistent with this. It must be demonstrated that the proposed draft Coastal IFOA activities will not significantly, and cumulatively, impact those World Heritage values.

There's also a need to conduct officially sanctioned assessments of all of the targeted forests (especially those adjoining existing Gondwana WH Property -including those areas already mapped for assessment as outlined on Australia's Tentative List), to establish if any are of Outstanding Universal Value (OUV) that should be added to the Gondwana Rainforests Estate

Buffers and corridors are paramount to the survival of our biodiversity. The need to consider such when faced with challenges of Climate Change should be uppermost in every land manager's mind. We're talking about one of Australia's most biodiverse areas here and it's incumbent on us all to do everything humanly possible to protect it.



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General comments, Aboriginal Culture:

Aboriginal Culture and heritage will also be impacted as the on ground management response resulting from the new draft Coastal IFOA has the potential to dramatically impact the inherent intrinsic values present within the effected landscape. Impacts will affect both the tangible and intangible components of Aboriginal Culture and Heritage and this must be recognised by Government when developing policy directives regarding land management.

The Draft NSW Aboriginal Cultural Heritage Bill has created an expectation that Traditional Owners will be involved in the co-design of any decisions being made that could impact those inherent intrinsic values, the tangible and intangible components of Aboriginal Culture and Heritage present within the effected landscape.

While I have the opportunity it's time to engage with Traditional Owners to modify adopted fire regimes in NSW and embrace mosaic burns would be a great step forward. The damage to our biodiversity that's caused by the current Hazard Reduction programs that essentially are chasing a Government imposed annual hectare burn regime is unsustainable

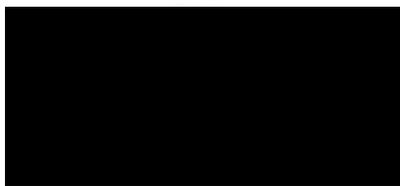
Climate Change is reducing the number of ideal burn days, subsequently Hazard Reduction is being undertaken in less than ideal weather conditions resulting in fires that are too hot that often run into the canopy. This is devastating and only adds to Australia's dismal record of species extinction. It's only going to get worse.

I believe the draft Coastal IFOA plans inevitably will lead to a sad conclusion. We can make a Great Koala National Park. This would protect 175,000ha of public forests between Kempsey and Woolgoolga. The same forests the government's koala-habitat model has identified as high-quality koala habitat. A Great Koala Park would provide long-term jobs in forest management and restoration and in the tourism and recreation sectors. It would provide hope for the future for koalas on the north coast.

There is a clear choice: clear-felled lifeless forests or a Great Koala National Park⁴

Thank you for the opportunity to comment

Regards



Rod W McKelvey

Declaration: Member of the Australian Institute of Company Directors, Chair of ETC Ltd., Chair of the Coffs Coast Regional Park Trust Board, member of Gondwana Rainforests of Australia CAC, member of the Australian Coastal Society, member of the Woolgoolga Surf Club's Rebuilding Committee Working Group, and founding/active member of Arrawarra Coastcare I don't make political donations.

⁴ GKNP brochure available at: <https://drive.google.com/file/d/0B3sKmVn4kYOBbFhzS1J3NnhyNVE/view>