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Q1. <b>First name</b>	Ross
Q2. <b>Last name</b>	McKinney
Q3. <b>Phone</b>	██████████
Q4. <b>Mobile</b>	not answered
Q5. <b>Email</b>	not answered
Q6. <b>Postcode</b>	████
Q7. <b>Country</b>	Australia
Q8. <b>Stakeholder type</b>	Individual
Q9. <b>Stakeholder type - Other</b>	not answered
Q10. <b>Stakeholder type - Staff</b>	not answered
Q11. <b>Organisation name</b>	not answered
Q12. <b>What is your preferred method of contact?</b>	Email
Q13. <b>Would you like to receive further information and updates on IFOA and forestry matters?</b>	Yes
Q14. <b>Can the EPA make your submission public?</b>	Yes
Q15. <b>Have you previously engaged with the EPA on forestry issues?</b>	No
Q16. <b>What parts of the draft Coastal IFOA are most important to you? Why?</b>	not answered
Q17. <b>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?</b>	not answered

**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?**

not answered

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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)?**

not answered

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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?**

not answered

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**Q21. General comments**

not answered

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**Q22. Attach your supporting documents (Document 1)**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Q23. Attach your supporting documents (Document 2)**

not answered

**Q24. Attach your supporting documents (Document 3)**

not answered

# Submission to the Integrated Forestry Operations Approvals (IFOA)

Ross McKinney



## Introduction:

Consideration of the current escalated and intensive clearing of native forests on private land must be taken into account within this proposed Coastal FOA.

Over the period of many years that the Forest Industries Association with the NSW Government has managed native forests; native wildlife species populations have declined. This is a direct result of habitat clearing and disturbance from timber extraction on lands managed by these two identities.

## COASTAL IFOA – WILDLIFE

### Habitat Clumps

#### IFOA Statement:

To protect threatened plant and wildlife habitat at the local landscape scale, at least 5% of the landscape must be permanently protected in wildlife habitat clumps prior to harvesting.

There are further protection requirements at the site scale. These include additional areas of 5% in the regrowth zone and 8% in the non-regrowth zone that must be permanently protected.

#### Comment:

Creating 5% 'islands' is of little use to the required movements of native animals, 24 hour or longer movements for food, shelter and breeding purposes. The 'island' must at very least be linked with mature growth corridors to have any chance of success.

10% in re-growth is not described in vegetation age or specie. 13% of non-regrowth is not described in vegetation or age of species. Neither states that the % is a representation on the total native plant species of the forest to be logged. This is a major design fault in this proposal and should be rectified and placed on public exhibition in an attempt to gain some credibility.

Minimum International Union of the Conservation of Nature (IUCN) requires 17% of retention and representative of the total ecosystem. This should be the minimum within the IFOA before being placed on public display for further comment by the community.

### Giant and Hollow Bearing Trees

#### IFOA Statement:

A minimum of five hollow-bearing trees must be permanently retained per hectare, where they exist. This is in addition to those already protected in habitat clumps. Where there are less than five remaining hollow-bearing trees in a hectare, all must be protected.

Improved mapping requirements for these trees, contained within the proposed Coastal IFOA, will provide the NSW

**Comment:**

It is well known that past timber extraction and land clearing is the major cause of the decimation of the population of hollow bearing trees, to the extent that 'false' hollows are being trialed in an effort to assist the declining populations of native animals dependent on hollow bearing trees. This is well known to the planners and authors of this proposed IFOA. It should be clearly explained why this fact has been illuminated from consideration in producing this document.

Every hollow bearing tree must be maintained and not left as a single tree with all vegetation surrounding the hollow bearing tree denuded or left as logging residue.

**IFOA Statement:**

Improved mapping requirements for these trees, contained within the proposed Coastal IFOA, will provide the NSW Environment Protection Authority with the information they need to monitor compliance. The maps will also be available for public viewing in an online map viewer.

**Comment:**

The IFOA does not provide the description of the "improved mapping requirements for these trees" so that the community can have any trust in the EPA to monitor compliance. Once the clearing or removal of hollow bearing trees has occurred, how does the EPA plan to address this situation? This "monitoring of compliance" is negligent in the extreme and further evidence is required.

## **Koalas**

**IFOA Statement:**

The proposed Coastal IFOA uses maps to better identify and protect areas where koalas are likely to live prior to harvesting. This will ensure greater consistency, and better habitat protection for koalas. Mapping will include different koala habitat types, with different tree retention requirements.

**Comment:**

The NSW State Koala Mapping has been proven to be highly deficient. The protection of areas where koalas inhabit is not explained and must be shown so the community can clearly see that the IFOA will be protecting koala populations and their corridors between populations. This 'proof' will also ensure that koalas are not forced to descend to the ground to migrate between koala colonies where they easily fall prey to feral pigs, domestic dogs etc.

To map the different koala habitat types is only effective if the mapping is a precursor to excluding koala habitat from timber extraction activities. The IFOA must clearly show this is the case and stated publicly.

## **Threatened Ecological Communities (TEC)**

**IFOA Statement:**

Under the proposed Coastal IFOA, a range of TECs have been mapped and will continue to be protected from harm.

**Comment:**

“Protected from harm” does not explain protection. The IFOA must state clearly how threatened ecological communities will be protected.

## COASTAL IFOA – LANDSCAPE

### Streams

**IFOA Statement:**

Exclusion zones around streams will maintain corridors of undisturbed vegetation, which provide habitat for aquatic species, sediment trapping and soil stability.

**Comment:**

It would be so encouraging for the community to know that The NSW Forest Corporation could demonstrate compliance to these important components of the proposed IFOA.

Corridors must be along both sides of the streams and must be of sufficient size to ensure stream protection under all seasonal conditions.

This must be clearly demonstrated within the proposed IFOA.

**IFOA Statement:**

Areas of old growth will continue to be protected under the proposed Coastal IFOA.

**Comment:**

The IFOA should include buffer zones around all Old Growth forests to ensure lack of impact from injurious agencies.

### Rainforests

**IFOA Statement:**

Rainforests are mapped and these areas will continue to be protected from harm during harvesting activities under the proposed Coastal IFOA.

**Comment:**

The IFOA should include buffer zones around all Old Growth forests to ensure lack of impact from injurious agencies.

**IFOA Statement:**

Ridge and Headwater habitat, large forest owl landscapes, rocky outcrops and other important habitat features will continue to be protected under the proposed Coastal IFOA.

**Comment:**

These habitat features must be described in detail and clearly shown in the proposed IFOA. The term “large forest owl landscape” must be a term familiar to NSW Forest Industries. It is not a term commonly used to describe owl habitat.

The proposed IFOA must clearly state:

What are the definition of a “large forest owl habitat” and the definition of ‘other owl habitat’?  
What species of owls are known to occur within the proposed IFAO?  
What are the habitat requirements of each species?  
AND, how does the proposed IFOA proposed to manage the owl’s habitat.  
What is the definition of a “Headwater habitat “?  
What is the definition of a “Ridge habitat”?  
How are these intended to be managed within the proposed IFOA?

## **Proposed Changes to Timber Harvesting in NSW's Coastal Forests**

### **Introduction:**

Native forest harvesting has been unsustainable for many years. That is, the amount of timber extracted is far more that is being replaced naturally or by native forest plantation establishment.

Logging and sawmill workers and their families have been duped by government and native forest managers for the purposes of fulfilling exorbitant contracts. The primary focus has been on short term profit with little regard for natural or assisted replenishment of native forests.

### **IFOA Statement:**

IFOAs effectively set out rules to protect native plants, animals, important habitat and ecosystems, soils and water in native forestry operations on public land.

### **Comment:**

Rules do not protect native plants, animals, important habitat, ecosystems, soils and water in native forestry operations – actions do!

The IFOA must set out clear actions for the retention of existing ecosystems (which include native plants, animals, important habitat, soils and water).

It must also set out clear actions for maintaining current levels of native wildlife populations within native forest operations and the actions for increasing native animal populations do not meet common/abundant status.

### **IFOA Statement:**

They (IFOA rules) also set requirements to achieve ecologically sustainable forest management in NSW.

### **Comment:**

Native forest operations since before 1975 have been a lesson in unsustainability. The older foresters and loggers have lamented the fact that the saw log take from native forest timber extraction operations has continued to be far in excess of natural or planted replenishment.

It is commendable that the NSW Government in conjunction with the NSW Forest Industries Association wishes to achieve ‘ecologically sustainable forest management in NSW’. This goal is the future for our children.

The IFOA must state within what year in the future under their expert management that timber extraction does not exceed natural or planted replenishment - I.E. SUSTAINABLE.

**IFOA Statement:**

The aim of the public consultation is to gather feedback from key stakeholders and the wider community to assist the NSW Government in determining whether the proposed Coastal IFOA conditions achieve the appropriate balance between maintaining environmental values, wood supply and social outcomes in NSW public forests.

**Comment:**

The IFOA must define in writing within the document what their experts/authors believe is the 'balance'. This gives the opportunity for the community including stakeholders to comment on the Government's and NSW Forest Timber Industry's formula and actions for sustainable native forest operations which will be achieved by the year stated.

**IFOA Statement:**

The draft Coastal IFOA sets out new rules for how native forestry operations can be carried out in coastal production forests in NSW. Among a range of new conditions, it sets new limits for:

- the area of forest that can be harvested in any one place or time
- the intensity of harvesting at a site, and across the landscape more broadly
- the protection of threatened and protected plants, animals, habitat and vegetation communities
- the protection of important forest features like tree hollows, rainforests, old growth forests, rocky outcrops, and wetlands and rivers
- the protection of soils and water
- Monitoring and adaptive management to ensure ecologically sustainable forest management.

**Comment:**

Once again, the specific actions and management directions must achieve "ecologically sustainable forest management within a given period, with the year of intended achievement stated. Not to do so makes a mockery of this document and the public consultation.