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Responded At: Jul 11, 2018 07:48:49 am

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IP Address: n/a

- Q1. **First name** Ryde Hunters Hill Flora and Fauna
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- Q2. **Last name** Preservation Society
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- Q3. **Phone** not answered
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- Q4. **Mobile** not answered
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- Q5. **Email** not answered
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- Q6. **Postcode** [REDACTED]
- Q7. **Country** not answered
- Q8. **Stakeholder type** Environment group
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** RHHFFPS
- 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
- 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?**
not answered
- 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?**
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

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

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

not answered

Q21. General comments

not answered

Q22. Attach your supporting documents (Document 1)

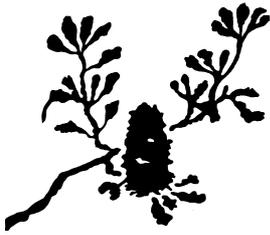
[Redacted]

Q23. Attach your supporting documents (Document 2)

not answered

Q24. Attach your supporting documents (Document 3)

not answered



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

**P.O. Box 2127
Boronia Park 2111**

The Hon. Gladys Berejiklian, MP
NSW Government
52 Martin Place
SYDNEY NSW 2000
10 July 2018

Attention: EPA

Dear Premier,

We write to express our strong objection to your government's proposed changes to timber harvesting in NSW's coastal forests. We feel this will entrench the unsustainable logging practices that have been occurring in NSW forests for over ten years. During this time, logging intensity has increased dramatically, especially in northern forests and is now at an intensity well outside the intent of the original Integrated Forest Operations Approval.

Our members have no confidence in the NSW government's stated commitment that the proposed changes "will achieve ecologically sustainable forest management in NSW." We have no confidence in government's stated claim to balance environment protection and the demands of logging interests. Opening old growth forests and rainforests to more intensive logging is not in the broader public interest. It is presented by government as the only approach and exposes the fundamental bias in the government's approach in its determination to meet unsustainable wood supply agreements rather than preserve the broad multi-use values of public native forests.

Unless there is a radical shift in forest management based on best scientific knowledge the values of these public resources will continue to be severely diminished and ultimately destroyed. The significant environmental, social and recreational benefits that native forests currently provide will not be available for future generations.

We are a conservation group established in 1966 largely in response to a local Council proposal to extend a rubbish tip in the Field of Mars Reserve, East Ryde. This proposal was successfully opposed by Society members and local residents and the Field of Mars Reserve remains an area of highly valued Crown and Council owned land for the purposes of public recreation, which was later re-dedicated to include purposes for the protection of native flora and fauna. Our members continue to help maintain the integrity of this important reserve.

The 50 hectare reserve, mostly natural bushland, is now a Wildlife Refuge and contains the award winning Field of Mars Environmental Education Centre visited by over 15,000 students each year. It provides important ecosystem services, including improved air and water quality to local residents, as well as making a valuable contribution to the amenity of local suburbs enjoyed by many people, both residents and visitors.

Similarly to the protection of the local Field of Mars Reserve, RHHFFPS members are concerned that NSW's public native forests are managed sustainably so as to ensure that the many values and benefits of our forests are available for future generations of both humans and native fauna.

In the proposed re-write of the native forest logging rules currently on exhibition, the government has failed to take account of the fact that RFAs have failed to deliver environmental protection or industry security.

Overall, we would urge government to rapidly shift to a timber supply based on plantation forests on public and private land rather than a continuing reliance on Australia's diminishing native forests.

Native forests provide a range of values to all Australians including:

- habitat corridors for our native species such as the iconic koala,
- important hollow bearing trees vital for around a quarter of Australia's vertebrate fauna,
- valued recreational activities, for a range of user groups and interests,
- opportunities to earn carbon credits,
- mitigation of climate change impacts,
- water catchment protection and supply of good quality drinking water,
- increased water yield,
- protection of Australia's biodiversity which is fast declining,
- preservation of healthy soils and
- improved air quality.

Non-timber forest values are vital for longer term regional economies compared to the limited and short term return on native forest logging. The establishment of the Great Koala National Park would provide a range of tourist driven activities which would be of benefit to North Coast towns and communities. The protection of ecosystem health is critical for access to clean air and water for future generations.

As expressed in a previous submission to government, it is our concern that the *NSW Regional Forest Agreements Implementation Report 2004–2014* provided a limited assessment of NSW's forests which did not taken account of the many independent and academic studies currently available to government. The 2004-2014 Report lacked scientific rigour, was based on out-of-date data and did not consider climate change issues. The RFA process itself has demonstrated a lack of capacity to undertake a genuine review based on the best available science.

To now use outdated and flawed reports to justify the continuation of the RFAs which by all independent and objective data have failed the native forests and the forest industry in NSW is of significant concern to our members.

Biodiversity loss continues at a fast and shameful pace in NSW and even the koala, dependent on native forests, has been listed as threatened since commencement of the RFAs. The impact of increased logging intensity on threatened species and communities has not been properly assessed and our members have no confidence that the government's proposed strategic landscape approach will afford improved protection of threatened species and communities to arrest this disgraceful pace of biodiversity loss. Genuine sustainable management of NSW public native forests is integral to the protection of the state's biodiversity.

The proposed intensive harvesting regimes are untested and fail absolutely to recognize the need to conserve the structural complexity of forests so as to maintain a healthy ecosystem function and prevent longer term degradation and biodiversity loss. It is likely that extensive areas of native forests will be replaced by even-aged trees which will not support the diverse habitat needs of native species. Impacts from pests and diseases such as dieback will be most likely exacerbated as intensive logging regimes become an entrenched practice in native public forests.

Hollow bearing trees are already in decline and especially vulnerable to proposed intensive harvest rates. The impact of the current logging regimes on the numbers of hollow bearing logs has not been rigorously assessed and there is a need to prioritise the retention of those hollow bearing trees which remain as a limited forest resource. All trees greater than or equal to 100 cm dbh must be retained to ensure an adequate rate of hollow retention and development.

We object to proposed reduction in watercourse buffers which will leave these important and strategic habitat corridors increasingly unprotected and prone to increased weed invasion. Some watercourse areas retain the best forests elements and an adequate riparian buffer zone is critical to their longer term ecological protection. Improved mapping techniques must be used to ensure an improved ecological protection of watercourses, not to facilitate expanded logging areas. All watercourses must have at least a 10m buffer protection area.

Overall, we object strongly to the intention by the state government to weaken the logging rules and remove the protections for threatened species, koalas, habitat trees, old growth and rainforest areas and waterways within NSW's public native forests. We urge you to move to an ecologically sustainable future for our precious native forests and seriously amend the proposed changes within the IFOA to reflect improved practice and management principles.

Yours sincerely

Cathy Merchant
RHFFPS Vice-President