



Respondent No: 159

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IP Address: n/a

- Q1. **First name** Tom
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- Q2. **Last name** Brennan
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- Q3. **Phone** not answered
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- Q4. **Mobile** not answered
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- Q5. **Email** [REDACTED]
- Q6. **Postcode** [REDACTED]
- Q7. **Country** Australia
- Q8. **Stakeholder type** Individual
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** not answered
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** No
- Q14. **Can the EPA make your submission public?** Yes
- 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?**
See General Comments
- 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?**
See General Comments

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?

See General Comments

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)?

See General Comments

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

See General Comments

Q21. General comments

In its original brief for the development of a new Coastal Integrated Forestry Operations Approvals (Coastal IFOA), the NSW Government made two commitments: - no net change to wood supply - no erosion of environmental values The Natural Resources Commission (NRC) stated in their report in 2016 that "The commitments around wood supply and environmental values are not mutually achievable". The draft Coastal IFOA has taken the position that the wood supply commitment is paramount. The NSW Government should instead be looking at what trade offs can be made to the wood supply to allow for no erosion of environmental values. Examples of where environmental values are being eroded include: - the reduction of the width of headwater protection of streams from 10m to 5m. This should be retained at 10m, particularly as otherwise existing habitat that has been protected for the past 20 years would now be subject to logging. Also, the change seems to be purely on the basis of managing the net change to wood supply, rather than being based on any scientific analysis. - 140,000ha of prime koala habitat on the north coast between Taree and Grafton is subject to intensive harvesting. Only 10 x 20cm trees per hectare need to be retained. This is too few trees of too small a size. - the retention of 5 hollow bearing trees per hectare is too low and does not allow for the natural attrition of such trees over time. There needs to be a mechanism for the ongoing replacement of hollow-bearing trees. Also, why is the harvesting size limit of Blackbutt and Alpine Ash 160cm when for all other trees it is 140cm? Again this is to allow for wood supply. It has nothing to do with environmental values. In any case, this size is arbitrary, and should be decreased to allow for the best chance of creating new hollow-bearing trees as mentioned above (100cm was the figure suggested by one of the Threatened Species Expert Panel). The Coastal IFOA needs to be changed to better balance the environmental values with wood supply commitments.

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
