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- Q1. **First name** Tom
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- Q2. **Last name** Whelan
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- 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?** Yes
- 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?**

Those parts dealing with the North Coast of NSW. Important to me because (a) that is where I live; (b) the scope of the changes is unprecedented.

**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?**

There are a large number of commitments made throughout the IFOA. If these commitments were all put into practice, if the logging companies complied with both the letter and the spirit of the new rules, if the reliance on subsidies actually disappear, if the mapping is done quickly and rigorously, then the outcomes would start to approach "positive"----but see comments below.

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**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?**

1. The NRC stated that it is not possible to meet Government's commitments around both environmental and wood supply, but then went to make cautious recommendations, riddled with caveats ("...provided the Commission's associated risk based recommendations are implemented" ) about timber industry compliance, provision of resources to government agencies (people, equipment, etc) to ensure compliance. The documentation makes NO MENTION of ANY additional resources to ensure compliance. This is despite the fact that the logging industry has repeatedly violated the conditions imposed by previous IFOA - which is one of the reasons for the new one. 2. The new IFOA appears to be an effort to obtain as much wood in as short a timeframe as possible. Frontloading of logging operations via transition arrangements and permitting the logging of old growth blackbutt and alpine ash trees up to 160cm diameter supports my view. 3. There is no evidence of any effort to assess the environmental impact of the (illegal) intensive harvesting on the north coast for the last 11 years. 4. The maximum size of legal clear felling under the old IFOA was 0.25ha, but new proposals will allow up to 45ha. 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. The expert panel stated that "the intensive harvesting zones are being formally introduced to prop up an unsustainable wood supply arrangement at the expense of the environment". 5. The intensification of logging under the new rules will result in the rapid homogenisation of large swathes of forest at the landscape and stand scale. 6. Opening old growth for logging means revoking and logging areas included in the informal reserve system, agreed by State and Commonwealth Governments as part of the Comprehensive, Adequate and Representative Reserve System. Logging these areas is therefore logging the public reserve system. Hence "permanent protections" are only permanent until they are deemed not to be permanent. 7. The new proposals allow logging of blackbutt and alpine ash up to 160cms (up from 140). 140 cm was already "old growth" and should be protected because they are already so rare in production forest landscapes. 8. the new regime requires no retention of recruitment trees (the next generation of hollow bearing trees) outside of clumps 9. There is very little data to support the fundamental shift from the last 20 years of management that remove the need to survey and protect occupied habitat for most threatened species. The new regime is supposedly accompanied by a monitoring program (despite lower costs being a driver of the changes) but there is no baseline upon which to ascertain trends because Forestry Corp has not undertaken monitoring in the past. The existing regime was meant to be based on monitoring and adaptive management that was never done, so there is no assurance that it will be implemented this time either. There is not one mention of additional resources being provided for this important monitoring program. 10. Finally, the reduction of headwater stream buffers from 10m to 5m simply flies in the face of reality The riparian areas are some of the most ecologically important features of forests.

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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)?**

From everything that I have read from the evidence of the NRC and the Independent Panel these protections in the past have been minimally successful and largely overlooked. There is simply no evidence to suggest the the new protections will be voluntarily complied with by the industry, and no evidence to suggest that the government agencies, or indeed NSW Forests, will employ the resources necessary to enforce them. Without rigorous enforcement systems in place, they are just words on a piece of paper.

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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?**

Absolutely not. Why, because of the consequences of my comments (1-10) above, the history of the clear felling industry, the failure of government agencies in the past to monitor, police and effectively prevent wholesale disregard for the "rules"; the lack of any evidence that the industry will voluntarily comply with the new rules and the lack of any evidence that the government agencies will be resourced to police the new regime; the likelihood that environmental groups will be actively prevented from taking steps to monitor compliance and make publicly available their evidence based findings.

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**Q21. General comments**

Stop the clear felling Focus on selective logging. Declare the Great Koala National Park in whole or in part.

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**Q22. Attach your supporting documents (Document 1)** not answered

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**Q23. Attach your supporting documents (Document 2)** not answered

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**Q24. Attach your supporting documents (Document 3)** not answered

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