



Remake of the Coastal IFOAs
Environment Protection Authority
PO Box A290
SYDNEY SOUTH NSW 1232

email: ifoa.remake@epa.nsw.gov.au

Dear Sir/Madam

Response to the Remake of the Coastal Integrated Forestry Operations Approvals Discussion Paper, February 2014

I write on behalf of Friends of the Koala's 350 members and our countless supporters to express our disappointment and bewilderment with the uncertainty created by the Discussion Paper. Even after attending the stakeholder session held in Lismore, many of the key changes being proposed remain obscure and lacking in information.

Friends of the Koala is the lead koala conservation group in the Northern Rivers. We are licensed by the Office of Environment & Heritage to rescue rehabilitate and release koalas in the region. We work with landholders, both public and private, to enhance koala habitat. We have established research partnerships and linkages with a number of universities and we engage in broad-based community education and advocacy, raising awareness of the koala's fragile plight east of the Great Divide. Our mission, which we have been pursuing since 1986, is conserving koalas in recognition of the contribution the species makes to Australia's biodiversity.

Our primary interest in the Integrated Forestry Operations Approvals (IFOAs) is their capacity to sustain forest health in perpetuity and to protect koalas and their habitat in forestry operations carried out in State Forests or other Crown land used for timber production.

While the IFOA remake's stated focus of *...improving the clarity and enforceability of IFOA conditions* suggest potential improvement, *reducing the costs of implementation and compliance...* is an immediate concern because of the inferred threat such reductions will have to effective implementation and enforcement. That the proposed IFOA does not include ecologically sustainable forest management (ESFM) as its principal underpinning objective is a major flaw, testing the very credibility sought by the new framework.

Friends of the Koala does not necessarily disagree with the desirability of an outcomes focus, however we are not yet convinced how "monitoring", "evidence" and "risk-management principles" will deliver it; indeed we do not understand the meaning of these terms in relation to koala protection in forestry operations. We fear that even the meagre protections in place will be weakened.

We agree that the "protection" afforded by the current koala conditions as discussed in the

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case study provided on pp. 20-21 is very questionable. However, while we have criticised the koala prescriptions and even more so their application over the years, we had expected their “improvement” rather than their abandonment.

As the *NSW Recovery plan for the koala (2008)* states, “Adherence to the general and koala-specific prescriptions of the terms of [IFOA] licence is an integral part of the management of koalas in state forests in NSW”. Further research to ensure that these prescriptions are effective in conserving koalas and koala habitat was recommended.

So, more information is required about the extent to which the proposed landscape-scale approach will replace targeted surveys and prescriptions, if indeed replacement is under consideration. You will be aware that Minister Parker has identified the Koala as one of four iconic species whose recovery is a Tier-1 priority in her Save Our Species initiative. Recovery implies improved protection and assertive management. We are of the view that pre-logging surveys and the identification of required exclusion zones need to be retained and undertaken independently of the Forestry Corporation.

Perhaps related will be the need to encourage local communities to share their knowledge to ensure that known koala populations are identified and protected. Mention was made at the Lismore session of the importance of threatened species sightings being logged with the Wildlife Atlas. Friends of the Koala holds thousands of koala records across the Northern Rivers region collected since 1989 but very few of those records are in the Atlas.

How the four current coastal IFOAs will be replaced with one single IFOA needs further exploration. Standardisation can be expected to have implications for sensitive environmental and heritage assets, considering the considerable variation between the forests covered.

The Environmental Defender’s Office, NSW (EDO) in its *Preliminary Briefing Note and Key Issues Paper* has pointed out that reducing the number and complexity of IFOA conditions has the potential to water-down current protections. Protocols that are proposed to be developed by the NSW Government to sit under the IFOAs will need to include enough detail to ensure that breaches are actually enforceable. EDO makes the point that the guidance material proposed to be developed by the Forestry Corporation of NSW in consultation with EPA and Department of Primary Industries to sit under the protocols will be unenforceable, so it is important that any detail required to ensure the availability of enforcement action is included in the protocols and not the guidelines.

The Koala is an obligate folivore; a true habitat and food specialists. Koalas only ever inhabit Eucalypt forests and woodlands, or what’s left of them. Many State Forests provide significant patches of koala habitat that nurture healthy koala populations in an otherwise fragmented landscape. Those animals are vital in the overall mosaic of wild-living koalas in the Northern Rivers region.

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Over-harvesting of our northern state forests is an acknowledged fact. Even the Auditor General found that "To meet supply commitments, the native forest managed by the Forestry Corporation on the north coast is being cut faster than it is growing back." (*Sustaining Native Forest Operations*, 2009)

Friends of the Koala therefore calls on the government to abandon the Discussion Paper's key concepts and ensure that the IFOA remake delivers better protection for koalas and their habitat rather than driving yet another nail in the coffin of koala survival in our region.

Yours sincerely

Lorraine Vass
President
2 April 2014

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