

Remake of the Coastal IFOAs  
Environment Protection Authority  
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Dear Sir/Madam

***Remake of the Coastal Integrated Forestry Operations Approvals (IFOAs)***

The sweeping changes to the forestry approvals that regulate logging operations in NSW's State forests proposed in the Remake discussion paper on exhibition are truly alarming, amounting to a substantial reduction in environmental protection and a serious threat to our native forests and the wildlife they support.

We find the stated commitment to maintaining timber supply at current levels **and** maintaining environmental values while reducing implementation and compliance costs, laughable. Current timber supply commitments are known to be unsustainable – failure to address this issue will result in severe impacts on biological diversity and forest health. Furthermore, self-assessment, whether due to incompetence or breaking the law, is demonstrably open to abuse. Besides we expect any review or remake of the IFOAs to improve public forests' environmental values.

The proposal to remove limits on logging intensity opens the way for widespread clear felling of our native forests. Removing the requirement to conduct pre-logging surveys for threatened species and habitat features will place those species at increased risk. Important threats to forest health, including invasive weeds and forest dieback are not adequately addressed in the discussion paper.

Removing the longstanding prohibition on logging on steeply sloping land will increase soil erosion and water pollution, promote weed invasion and threaten landscape scale wildlife corridors. This is a radical change and is totally incompatible with the principle of ecologically sustainable forest management. We oppose the proposed steep slope harvesting trial. We support the Environmental Defender's Office's call for a peer review and independent assessments to be made before any trial takes place.

We also support their call for the inclusion of third-party enforcement action if changes are being made to the legislation regulating forestry in NSW. The EDO advises that the *Forestry Act 2012* currently does not all members of the public to bring enforcement action for breaches of the law, but relies on the Minister taking action, resulting in a very low prosecution rate despite regular and often serious breaches by the Forestry Corporation and its contractors.

In conclusion we strongly oppose the proposed changes, and call on the NSW Government to abandon this ill-considered plan to weaken protection for our native forests and wildlife.

We request that our **names only** are published; (not our contact details).

Yours sincerely

**Lorraine & Rick Vass**  
4 April 2014