



## One page submission to NSW Environment Protection Authority on 'Remake of the Coastal Integrated Forestry Operations Approvals'

### Overview

We note the NSW Government's statement that "**objectives** of the coastal IFOAs remake are to reduce the costs of implementation and compliance and to improve the clarity and enforceability of IFOA conditions. The NSW Government has committed to delivering these objectives with no net change to wood supply and maintenance of environmental values.

Objectives and commitments above are unfortunately incompatible and incomplete for 3 reasons:

- (a) **EPA takes no account of Climate Change** (refer 2014 Science, IPCC & Au.Gov. Reports)\*
- (b) **Environmental values suffer under more intensified logging & reduced site monitoring**
- (c) **Wood supply at current levels is unsustainable** (refer BORAL & Eden Woodchip supply)

### \*FOREST CARBON CREDITS

- Refer attached ANU Forum & 'Logging or Carbon Credits' Paper presented 22-Feb-14
- Refer 2014 IPCC Reports on Kyoto2 Forest Management, Natural Systems & Forestry
- NSW Gov/EPA should look beyond FCNSW & DPI for independent non-government advice

EPA can protect Coastal Forest Ecosystems and Threatened Species as carbon credit 'co-benefits'.

Plantations can supply all the wood we need (refer Australia's 2014 State-of-the-Forests Report).

FCNSW's loss-making native forest logging operations have failed to achieve certification by the international Forest Stewardship Council (FSC) and that is why BORAL's customers with-held orders. Nippon-Paper know their Eden Woodchip Mill subsidiary faces similar market realities. Today, shamefully, Non-FSC Wood-chips from High Conservation Value (HCV) State Forests in this developed country of Australia are unfairly competing with sustainable third-world Plantations.

Four new recommendations are being made to our Australian and State Governments in 2014:

1. **Implement 'honest' Forest Carbon Accounting to report 'up-front' carbon emissions.**
2. **Avoid up to 60% 'up-front' carbon emissions/pollution from logging native forests.**  
(Plantations avoid this 'up-front' Carbon Debt).
3. **Apply for 'Forest Carbon Sequestration Credits' via re-growth in State Forests.**

Australian trees are 'carbon capture & storage devices' which continue increasing their carbon content well beyond the next 100 years (attested by 'hollows-dependent' species).

**Note:** Above 'avoidable emissions' and 'sequestration' can combine for **Carbon Credits** as valid 21<sup>st</sup> Century 'products' with environmental service co-benefits and 'social license'?  
**Is this the profitable future for FCNSW's new Native Forest Stewardship Division?**

4. **Promote regional jobs**, tourism, training, FSC-Certified Plantations and a 'Social Licence' for the once-proud Forestry Industry via these 4 steps (Plantations already supply 90% of Australia's sawn timber – ref. Australian Government's 2014 State-of-the-Forests Report).