

From: [REDACTED]
To: [_ALL-EPA-Forestry-IFOARemake](#)
Subject: Public Submission to IFOA remake
Date: Sunday, 6 April 2014 7:05:08 PM

6/04/2014

To whom it may concern;

RE: Coastal Integrated Forestry Operations Approvals

Thank you for the opportunity to comment on the NSW Discussion paper on the remake of the Coastal Integrated Forestry Operations Approvals.

The NSW Government states 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**."

The two key points I would like to make in response to this statement are;

1. The current timber supply quotas from NSW are unsustainable – not just for log supply but also for ecological function. The current timber supply quota, if maintained will have severe, irreversible impacts on biological diversity and silvicultural value (NSW Auditor-General 2009). If there is **no net change** to timber supply quotas it will be impossible to maintain environmental values.

2. The proposed changes will negatively impact on environmental values because they:

- Weaken protections for vulnerable species
- Remove requirements for threatened species survey prior to logging
- Remove restrictions on intensive logging and clearfelling
- Allow logging on steep slopes thereby greatly increasing soil erosion and water pollution

Forestry NSW have already failed to achieve certification by the international Forest Stewardship Council (FSC) with the **current** compliances (and BORAL's customers with-held orders as a result) – the proposed changes will only worsen the environmental compliance of logging operations – i.e. **reduce NOT maintain** environmental values.

The impacts of removal of the prohibition of steep land logging are so obviously dire, no-one with any education and experience in soil management would condone this practice. It contravenes every good soil and water conservation practice in Australia. Well-documented downstream effects of water-borne soil sediment include destruction of breeding habitat of amphibians, pollution of water used by cattle graziers, and coastal estuary pollution & sedimentation effects on coastal fisheries. No other land-user would be allowed to do this –the forest industry should not be exempt.

The discussion paper suggests “landscape” approach to threatened species management – yet how are they going to know if/when threatened species are being affected if they have no baseline data to compare against in the future? Threatened species surveys need to be done, and **independently** of the Forestry Corporation.

I also deplore the NSW Government's decision to seek advice on forestry regulation from the Tasmanian Forest Practices Authority. This authority allows clear-felling, old-growth forest felling, felling in rainforest areas, and use of chemicals for which very strong circumstantial evidence suggests are causing outbreaks of health problems in humans and wildlife in Tasmania. This industry is propped up by subsidies (approx. \$25mill **per year** – source : The Australia Institute 2014) yet only employs approx. 1200 people - and so clearly their forestry practices NOT exemplary!! Prime Minister Abbott would not save Armona SPC by giving them a one-off of \$25million – so why should we in NSW listen to an industry that requires this subsidy **every year?**

In summary, I strongly urge NSW Government to abandon these proposed changes and instead reduce timber quotas and try to adopt more innovative ways of managing NSW's native forest timber supply, such as carbon capture and storage.

Yours sincerely

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