



# *Coastwatchers*

## *Eurobodalla's environment group*

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Submission – Remake of the Coastal Integrated Forestry Operations Approvals

Thank you for the opportunity to comment on the discussion paper.

The Coastwatchers Association acknowledges that much needs to change to protect the health of public and crown forests in the coastal forest estate. The waterways, drainage networks and biodiversity held within these coastal catchments face increasing levels of threat from many threatening processes such as increasing human recreation activities within forests, continuing forestry, decrease resourcing to natural resource management agencies and invasive pest species impacts.

Changing climate impacts while posing significant challenges also provide the best opportunity for forests to be the first line of defence in the long term mitigation of these impacts. The most powerful long term service that coastal native forests can provide is that of carbon capture, studies in South East Australian unlogged forests have demonstrated that these forests are the most carbon dense in-situ forests.

It is concerning that the state government appears to be reviewing the IFOA before looking at higher order issues like whether the RFA's are achieving what they were intended to achieve? Surely it would stand to reason that the overarching legislation must be changed before operational licenses are determined, to do otherwise would suggest that the tail is wagging the dog and cause concern for 'in whose interests are been served' . By the government's own admission in the discussion paper the coastal IFOA's have not been successful and accordingly have the RFA's delivered the environment protection and economic benefits that the wider community was expecting.

It is widely known the native forest logging has been an economic failure and has cost taxpayers significantly. It is time for the State to end native forest logging and transition into the plantation industry. It is also time to invest in the protection and enhancement of former production based native forests and manage those forests for their carbon capture capacities, catchment and water yield values.

In the Southern Region the closing down of many sawmills, along with pulp logs and lower value timber products making up the largest volume of timber extracted from the region's forests, which has been the case for many years now, would indicate that sawlog volumes are not available for an industry which is driven by the need to meet a 'high quality sawlog quota'. Simply put the timber volumes that are sought are not available and the condition that volumes will be unchanged must go for the health of the environment.

In summary Coastwatchers recommends that the State Government:

- End the logging of public native forests;
- Manage public native forest to protect and enhance their biodiversity, catchments values and carbon capture capacity;
- Transition to timber-based plantation industry;
- No logging on slopes above 18degrees;
- Legislative amendments make non-licence terms enforceable;
- Stakeholders engagement – document exhibition should be for a period of at-least 3 months;
- Support strengthening penalties for industry breaches;
- Support industry accreditation but this should not lessen FC compliance.

For your consideration.

Chris Kowal  
President  
6 April 2014