From:

To: ALL-EPA-Forestry-IFOARemake

Subject: Sub to Remake of the Coastal Integrated Forestry Operations Approval

Date: Sunday, 6 April 2014 3:48:18 PM

Submission to the paper:

Remake of the Coastal Integrated Forestry Operations Approval

The introduction claims that while the recommendations of the Review "have clarified and simplified some IFOA conditions and helped to facilitate improved operational efficiency and environmental outcomes, the review did not address the fundamental structural issues with the IFOAs or resolve implementation and enforcement difficulties."

It is disingenuous to claim the Remake has attempted to improve environmental outcomes.

What is clearly at the core of this process is the fact that Forestry in NSW and elsewhere in Australia is losing money continuously because the original RFAs allocated an unachievable amount of timber to the logging industry.

It is not good enough "to attempt" to improve environmental outcomes. The fact that you have not been able to guage whether the past so-called protections were working is due to lack of observation, refusing to recognise breeches exposed by activists and paltry fines when breeches are proven.

The EPA works in concert with FNSW, misidentifies old growth and rainforest and from my last inquiry had never (never) found a threatened species in their pre-logging surveys.

FNSW disputes core koala habitat agreed by local councils and supports maximum log take at every step.

This much change.

The lament on enforceability is similarly disingenuous as there has not been funding for enforcement, a lack of expertise and will by the EPA to ensure compliance and the ridiculous slap on the wrist warnings and eventual paltry fines made breeches insignificant compared to the value of the logs taken.

What the Remake now proposes will result in the weakening of protections for our most vulnerable native plants and animals through removing requirements for pre-logging threatened species surveys, removing restrictions on intensive logging operations and clearfelling.

I find it incredible that you are contemplating allowing logging on very steep slopes. This just shows how desperate the government and the industry is to extract the very last old growth and rainforest trees at the cost of increasing erosion and water pollution risks.

If you were serious about environmental gain you would revert to the 18 degree slope maximum, not increase it to whatever you can drag out of the deep gullies which are often little spared reserves of biodiversity sometimes resistant to fire and able to seed back out into hat used to be a native forest and now becoming a monoculture of Blackbutt.

We are getting mixed messages on this "consultation". We are told from the top increasing the logging take is set in stone, yet people running the consultation are saying "But we want to hear what you think."

People are sick of Clayton's consultation like the DPI consultation on Grey Nurse Shark where the overwhelming result was a call for 1500m sanctuary and further consultation in the form of a stacked Forum naturally could not reach a compromise and bait fishing in key aggregation sites was still allowed and is still going on.

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politics is the art of the possible environmentalism is the art of the impossible it just takes a little longer