



**Respondent No:** 221

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- Q1. **First name** Graham
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- Q2. **Last name** Quint
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- Q3. **Phone** [REDACTED]
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- Q5. **Email** [REDACTED]
- Q6. **Postcode** [REDACTED]
- Q7. **Country** Australia
- Q8. **Stakeholder type** Other
- Q9. **Stakeholder type - Other**  
The National Trust of Australia (NSW)
- Q10. **Stakeholder type - Staff**  
not answered
- Q11. **Organisation name** Director - Advocacy
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** Yes
- Q14. **Can the EPA make your submission public?** Yes
- Q15. **Have you previously engaged with the EPA on forestry issues?** No
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**  
See attached submission
- Q17. **What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?**  
See attached submission

**Q18. What parts of the draft Coastal IFOA do you think have a negative outcome on the management of environmental values or the production of sustainable timber? Why?**

See attached submission

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**Q19. What are your views on the effectiveness of the combination of permanent environmental protections at the regional, landscape and operational scales (multi-scale protection)?**

See attached submission

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**Q20. In your opinion, would the draft Coastal IFOA be effective in managing environmental values and a sustainable timber industry? Why?**

See attached submission

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**Q21. General comments**

See attached submission

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**Q22. Attach your supporting documents (Document 1)**

[Redacted]

**Q23. Attach your supporting documents (Document 2)**

not answered

**Q24. Attach your supporting documents (Document 3)**

not answered

27 June 2018

Mr Anthony Lean  
Chief Executive  
Office of Environment & Heritage  
PO Box A290  
Sydney South, NSW 1232

Dear Mr Lean,

### Draft Coastal Integrated Forestry Operations Approvals (IFOA)

The National Trust of Australia (NSW) makes the following comments on the publicly exhibited Draft Coastal Integrated Forestry Operations Approvals (IFOA).

On the 30 April, 2014, the Board of the National Trust adopted a **Forests and Woodlands Policy**, following on from an earlier **1986 Forests Policy**. A copy of the **Forests and Woodlands Policy** is attached.

With regard to the Draft Coastal Integrated Forestry Operations Approvals, the National Trust, as set out in its **Forests and Woodlands Policy**, holds the following policy positions –

1. The National Trust will continue to promote the concept that viable and representative samples of forest and woodland ecosystems should be preserved free from logging or other exploitation as Flora Reserves in State Forests but ideally as Conservation Reserves.
2. The National Trust Register will continue to be an important cornerstone for the Trust's advocacy to promote recognition of the heritage values of forests and woodlands, and for protective legislation and for their maintenance and sensitive continuing use. The National Trust will continue to produce and maintain its own Trust Register listings as a key part of its advocacy for the conservation of forests and woodlands.
3. The National Trust supports and promotes the use of *The Australian Natural Heritage Charter* in relation to the conservation of forests and woodlands and the Charter's acknowledgement of the principles of intergenerational equity, existence value, uncertainty and precaution.
4. The National Trust will continue to educate and advise the wider community on the heritage values of forests and woodlands and on their proper care and management.
5. The National Trust will continue to take any action it considers appropriate when forest and woodland areas it considers important are threatened by unwise planning, or damaging development/practice use practices.
6. With regard to forests and woodlands, the National Trust supports and promotes the World Conservation Strategy's definition of 'conservation' as *"the management of human use of the biosphere so that it may yield the greatest sustainable benefit to present generations while maintaining its potential to meet the needs and aspirations of future generations. Thus conservation is positive, embracing preservation, maintenance, sustainable utilisation, restoration and enhancement of the natural environment."*



In furtherance of these Policy positions, the National Trust makes the following comments on the Draft Coastal IFOA.

The National Trust understands that the Draft Coastal IFOA contains proposals to allow logging in 'exclusion zones' which form part of the reserve system. To increase timber supply, 'headwater stream buffers' (areas around waterways that cannot be logged) will be reduced from ten to five metres.

The Draft Coastal IFOA also proposes to allow the logging of very large trees up to 140cm in diameter. With the preferred timber species blackbutt (*Eucalyptus pilularis*) and alpine ash (*Eucalyptus delegatensis*), it is proposed to allow the logging of giant trees up to 160cm in diameter.

A new 'intensive harvesting zone' of 140,000 hectares of coastal forests is proposed between Taree and Grafton. The Trust understands that these forests are in the Forests of East Australia global diversity hotspot and many of the forests are included in the proposed Great Koala National Park.

Key koala habitat is mature forests with large trees. The 'intensive harvesting zone' will apply to nearly 50% of the identified high quality koala habitat. Under the new draft proposals, loggers will only be required to keep ten trees of 20cm diameter per hectare, which is far too few and too small for koalas.

The National Trust also understands that the National Recovery Plan for the swift parrot (*Lathamus discolor*), which is endangered at the NSW level and critically endangered at the national level, proposes the retention of all trees over 60cm diameter.

The National Recovery Plan for the regent honeyeater (*Anthochaera Phrygia*) identifies all breeding and foraging habitat as critical for survival. The regent honeyeater is critically endangered at both the NSW and Commonwealth level.

Both of these birds are priority species under the Australian Government's Threatened Species Strategy and this is the type of area that is the preferred habitat of these birds. The proposed intensive harvesting zone is incompatible with the Threatened Species Strategy.

The proposed changes in the Draft Coastal IFOA appear to prioritise timber extraction over environmental protection and also appear to abandon commitments made under the 1992 National Forests Policy Statement, which include the concept of ecologically sustainable forest management.

The National Trust lodges its strong objections to these changes and would welcome an opportunity to further consult with and hear the views of, the Department of Environment and Heritage on the Draft Coastal IFOA.

Yours sincerely,

Debbie Mills  
Chief Executive Officer



## The National Trust of Australia (New South Wales) Forests & Woodlands Policy

### Preamble

Forests and woodlands have many values - the maintenance of essential ecological processes, the protection of soil and water systems, the provision of habitat for wildlife, scenic enhancement, recreational opportunity, and aesthetic beauty and the supply of wood and other products. There has been a continual decline of the major forest systems of the world, a decline that has been equally evident in Australia. Public awareness of this decline has resulted in increasing debate in Australia over the use, protection and management of forests and woodlands. The National Trust, since its inception in 1945, has been involved in this debate, and some of its past actions in protecting the heritage significance of forests and woodlands include the 1974 Trust opposition to the clearing of native forests on the Boyd Plateau for establishing pine plantations, the 1979 Trust submission to the Terania Creek Commission of Inquiry urging the protection of the State's rainforests and the 1980 Trust Council approval of a Rainforest Preservation Policy. The Trust has listed on its Register a number of forests and woodlands including Border Ranges (1978), Washpool (1982), Barrington Tops (1984), Cumberland Plain Woodlands (1986) and Ben Halls Gap Old Growth Forest (1991).

The Trust believes that forests and woodlands are a living resource which, properly managed, not only can conserve various ecosystems and species for scientific or philosophical reasons, but can also be used for the protection and enhancement of other living resources (and the non-living on which they may depend), as well as for the benefit of mankind itself through the use of wood and other forest products. However, in adopting this philosophy, the Trust Policy also makes it clear that it may be necessary to manage some forests and woodlands without any objective for wood production at all. In 1986 the National Trust adopted its first Forests Policy and this document builds on that earlier Policy.

### Policy

1. The National Trust will continue to promote the concept that viable and representative samples of forest and woodland ecosystems should be preserved free from logging or other exploitation as Flora Reserves in State Forests but ideally as Conservation Reserves.
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3. The National Trust supports and promotes the use of *The Australian Natural Heritage Charter*<sup>1</sup> in relation to the conservation of forests and woodlands and the Charter's acknowledgement of the principles of intergenerational equity, existence value, uncertainty and precaution.
4. The National Trust will continue to educate and advise the wider community on the heritage values of forests and woodlands and on their proper care and management.
5. The National Trust will continue to take any action it considers appropriate when forest and woodland areas it considers important are threatened by unwise planning, or damaging development/land use practices.
6. With regard to forests and woodlands, the National Trust supports and promotes the World Conservation Strategy's definition of "conservation" as "the management of human use of the biosphere so that it may yield the greatest sustainable benefit to present generations while maintaining its potential to meet the needs and aspirations of future generations. Thus conservation is positive, embracing preservation, maintenance, sustainable utilization, restoration and enhancement of the natural environment."

Author: Graham Quint

Approved by the National Trust Board: 30 April, 2014

<sup>1</sup>*The Australian Natural Heritage Charter (Standards and Principles for the Conservation of Places of Natural Heritage Significance)* published by the Australian Heritage Commission in association with the Australian Committee for the International Union for the Conservation of Nature (IUCN), now the World Conservation Union. 1996