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Q1. First name	Roslyn
Q2. Last name	Woodward
Q3. Phone	not answered
Q4. Mobile	
Q5. Email	
Q6. Postcode	
Q7. Country	Australia
Q8. Stakeholder type	Environment group
Q9. Stakeholder type - Other not answered	
Q10. Stakeholder type - Staff not answered	
Q11. Organisation name	VALLEY WATCH INC
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?	Yes
Q16. What parts of the draft Coastal IFOA are most important to you? Why? not answered	

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?

not answered

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?	
not answered	
Q19. What are your views on the effectiveness of the or regional, landscape and operational scales (multi-	combination of permanent environmental protections at the i-scale protection)?
not answered	
Q20. In your opinion, would the draft Coastal IFOA be timber industry? Why?	effective in managing environmental values and a sustainable
not answered	
Q21. General comments	
Please see our submission attached.	
Q22. Attach your supporting documents (Document 1)	
Q23. Attach your supporting documents (Document 2)	not answered
Q24. Attach your supporting documents (Document 3)	not answered



VALLEY WATCH Inc.

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13 July 2018

www.engage.environment.nsw.gov.au/forests

Please accept this email as our Submission to the Review of the Draft Coastal IFOA.

Valley Watch members recently had the opportunity to attend an information evening exposing what is really going on with NSW forests and this submission for not only voices our objection to proposed new changes but will be the start of an intense campaign to expose the damaging practices of NSW Forestry and the lack of accountability and enforcement taken by government agencies at all levels.

New logging laws released by the NSW government on 14th May 2018 will see a drastic sacrifice to environmental values held by many in the community. They will degrade large areas of publicly owned native forest and leave them inhabitable for our unique native species and unable to provide essential ecological services such as filtering of water before entering streams.

These proposed new guidelines - IFOA (Integrated Forestry Operations Approval) will drastically weaken existing inadequate logging laws, which have for decades been challenged by concerned scientists, ecologists, community, with even the governments own staff are speaking out to help stop this rape and pillage of our native forests.

The existing laws have proven to be unsustainable, unenforceable, unmonitored, open to corruption and costing tax payers millions.

Rather than recognize this we now have Forestry NSW and the EPA reviewing the laws and replacing them with even more unenforceable 'guidelines'. These proposed new guidelines are doing nothing more than support an industry that is obviously failing sustainability guidelines, economic arguments and social licences.

The new logging guidelines remove numerous protections for NSW's threatened species, koalas, old-growth forest, rainforest, riparian zones and waterways that have been in place for 40 years - yet have grossly failed to protect these values

Valley Watch Inc calls upon you to stop proceeding with these changes and:

1. Recognise that the current Regional Forest Agreements have failed to deliver environmental protection or industry security: A full public review or investigation by independent body needs to be instigated immediately. Past practices leave little faith in this industry or the governing bodies that are supposed to be looking after our forests.

- 2. Recognise that the benefits of non-timber forest values are vital for the future of regional economies and ecosystems and ensure they are managed for the public good: Benefits include fresh water, carbon sequestration, increased biodiversity, recreation and tourism (bushwalking, camping, bike riding, hunting, scenic drives, public health and wellbeing, cultural and spiritual values, scenery, jobs in tourism (both Australian and International), back-drops to coastal towns visited by thousands of tourists each year and inhabited for their natural values which include forests. It is vital that good management incorporates environmental repairs and protections of wildlife habitat.
- 3. **Establish the Great Koala National Park as an immediate priority:** This has support from communities and government bodies across the North Coast and is vital to ensure the protection of this iconic species.
- 4. Stop planning to log areas protected as habitat for threatened species, Koalas, old-growth forest, rainforest and stream buffers. Past practices have not protected these areas or species. The new guidelines required to meet unrealistic timber targets will impact further with reduction of protection that is vital to these areas. Sustainable logging does not come at the cost of species extinction, water quality decline, reduced stream flows or ongoing sustainable forestry based jobs.
- 5. Stop increasing logging intensity and legalizing clear-fell logging along the North Coast of NSW. We have noted the NSW has called for tenders for new contracts for wood to be exported from ports along the East Coast. The tender date closed before we have even made this submission. It clearly shows the NSW government is intent on erosion of environmental values at all costs and is looking for an even greater wood supply then before. This increase wood supply would no doubt be coming from our protected old-growth forests, riparian zones and other protected habitat. This is completely unacceptable and unsustainable for the future of Australian jobs in Australian sawmills. The proposed 140,000ha North Coast Intensive Zone is strongly opposed. Clear-felling must not be allowed
- 6. Commit to a just transition out of native forest logging on public land and the transfer of public forests to protected areas when the RFAs expire.
- 7. Transfer all existing subsidies from native forest logging into native forest restoration.
- 8. End the logging of public native forest and complete the transition of the timber industry to 100% plantations

Valley Watch Inc is working closely with other environmental groups on the North Coast and will be closely monitoring your performance in these areas and taking further action if we do not see an immediate marked improvement in outcomes for our forests.

Yours Sincerely

Ros Woodward President Valley Watch Inc