

Coastal Integrated Forestry Operations Approval

Consultation Summary Report

November 2018

Contact:

Brendan Blakeley

Brendan.blakeley@elton.com.au

02 9387-2600

Sydney

02 9387-2600

Level 6

332-342 Oxford Street

Bondi Junction NSW 2022

www.elton.com.au

consulting@elton.com.au

Sydney | Canberra | Darwin

ABN 56 003 853 101

Contents

EXECUTIVE SUMMARY	5
1 INTRODUCTION	9
2 CONSULTATION OVERVIEW	10
2.1 Briefing sessions	10
2.2 Submissions	10
3 FEEDBACK FROM BRIEFING SESSIONS	15
3.1 Sydney	15
3.2 Northern Region – Grafton	17
3.3 Mid-North Region – Port Macquarie	18
3.4 Northern Region – Lismore	18
3.5 Southern Region – Batemans Bay	19
3.6 Southern Region – Narooma	20
3.7 Southern Region – Eden	21
4 FEEDBACK FROM UNIQUE SUBMISSIONS	23
4.1 Overall sentiment on the draft Coastal IFOA	23
4.2 Guided submission responses	25
4.3 Free-form submissions	30
5 FEEDBACK FROM CAMPAIGN SUBMISSIONS	46
5.1 Environmental campaign submissions	46
5.2 Forestry industry campaign submissions	48
APPENDICES	
A Coding framework	51
B Campaign submission examples	55
C Submissions received	60
FIGURES	
Figure 1 Submissions by response method (all submissions)	11
Figure 2 Geographic distribution of NSW submissions with postcode provided (1,258 submissions)	12
Figure 3 Interest group key themes	31
Figure 4 Environmental stakeholder submissions – overall issue	32
Figure 5 Environmental stakeholders – species and habitat breakdown	33

Figure 6	Environmental interest submissions – harvesting and yield breakdown	34
Figure 7	Environment interest submission – implementation breakdown	35
Figure 8	Forestry stakeholders – overall issues	36
Figure 9	Industry stakeholders – species and habitat breakdown	37
Figure 10	Industry stakeholders – harvesting and yield breakdown	38
Figure 11	Industry stakeholders – implementation breakdown	39
Figure 12	Other stakeholders – overall issue	40
Figure 13	Other stakeholders – species and habitat breakdown	41
Figure 14	Other stakeholders – harvesting and yield breakdown	42
Figure 15	Other stakeholders – implementation breakdown	43

TABLES

Table 1	Overview of briefing sessions and attending stakeholders	10
Table 2	Geographic distribution of submissions (by post code)	11
Table 3	Unique individual and peak group submissions by stakeholder type	13
Table 4	Unique individual and peak group submissions by interest area	13
Table 5	Campaign (form) submissions	14

Executive summary

This report summarises the stakeholder feedback received from briefing sessions and submissions to the NSW Government during consultation on the draft Coastal Integrated Forestry Operations Approval (draft IFOA).

Briefing sessions were held during the eight-week consultation period (between 15 May and 13 July 2018) to assist stakeholder groups to make informed submissions. The NSW Government provided information on the broader forestry reforms, the role of the Natural Resources Commission (NRC), key components of the draft IFOA and its conditions and protocols, and supporting documents that informed the development of key settings. Briefing sessions were held in seven locations: Sydney, Grafton, Port Macquarie, Lismore, Batemans Bay, Narooma and Eden. Invitations were sent to key industry and environmental stakeholders.

The briefings were one aspect of an extensive consultation process that included supporting material presented on the NSW Government's 'Have Your Say' website (IFOA website) such as videos, briefing session presentations, frequently asked questions and case studies.

There was significant interest in responding to the draft IFOA, with 3,148 submissions received during the consultation period. The majority of feedback on the draft IFOA (2,729 submissions) were campaign submissions supporting either environmental (2,350 submissions) or forestry industry¹(379 submissions) interests.

Feedback during the briefing sessions and from the campaign responses reflected strong regional concerns by environmental stakeholders² regarding forestry operations in northern or southern coastal forests. The scope of their concerns was broad, incorporating threatened species and habitat protection, catchment management and the opportunities to use native forests for multiple and alternative social and economic values (such as for carbon sequestration and tourism). Forestry industry stakeholders, in both briefing sessions and campaign letters, also noted local and regional concerns. These focused largely on provision of wood supply and the costs of over-regulation, whilst indicating the greatest economic impact of the new Coastal IFOA would be felt on regional economies.

Concern about the effectiveness of monitoring and enforcing forestry regulations, including the role of the Forestry Corporation of NSW (FCNSW) was raised by forestry industry and environmental stakeholders, albeit with different perspectives.

Feedback from briefing sessions

Forestry industry stakeholders welcomed aspects of the draft IFOA. They noted that the draft IFOA had more clearly defined conditions and protocols. This would enable both industry and the community to have a greater shared understanding of exactly what should be expected before, during and after carrying out forestry operations. An example provided was clarification of ground protection zones for environmentally significant areas.

It was frequently noted that the existing IFOAs are open to variable interpretation leading to ongoing contestation as to what exactly is allowed when conducting harvesting operations. Session participants suggested that the Government should allocate significant resources to educate industry and

¹ **Forestry industry** refers to all organisations (FCNSW, contractors, mills, timber suppliers etc) and individuals (employees, family and friends) with an interest in maintaining forestry operations.

² **Environmental stakeholders** refers to environmental groups, community organisations and individuals with a focus on forest ecology.

environmental interests about the new Coastal IFOA and how its regulations will be applied – both for community and forestry contractors.

Other aspects of the draft IFOA supported by the forestry industry included increased monitoring and reporting to support the industry's social licence to operate, improved mapping of sensitive environmental features and moving to a range of conservation outcomes and scales within a landscape approach.

Forestry industry participants expressed reservations about the potential impacts of the conditions and protocols in the draft IFOA on the security of wood supply at the local and regional level. In general, industry stakeholders felt that forestry was over-regulated and expressed a desire for increased flexibility in conditions to reflect the complex and varied working environment. These groups also sought certainty about how regulations would be enforced.

Specific issues that were commonly raised were the economic and operational impacts of cumulative layers of protections, the utility of basal area calculations and tree retention arrangements to protect hollow-bearing trees, the accuracy of GPS systems, and the implications of the draft IFOA provisions for fire management and harvesting regimes.

Environmental stakeholders commonly raised concerns about the impacts of forestry operations on wildlife and threatened flora and fauna, ground and watercourse disturbance, loss of hollow-bearing trees and significant habitat, and the proposed remapping of old growth forests. There was strong support for retaining public native forests for their intrinsic environmental values, for carbon sequestration and as tourist destinations. The draft IFOA was widely viewed amongst these stakeholders as the Government facilitating an inherently unsustainable industry.

The Environmental Defenders Office New South Wales (EDO NSW) was the only peak environmental group³ to participate in the draft IFOA briefing sessions, with other peak environmental groups declining to attend. EDO NSW noted that there was significant concern within the environmental sector regarding the authenticity of the consultation process for the draft IFOA and other native forestry reforms.

Environmental stakeholders who did attend the briefing sessions felt that policy outcomes have been shaped by industry and predetermined by the Government, rather than reflecting the views of the broader community. Concerns were also raised about the lack of investment in enforcement and compliance activities and a greater reliance on intensive harvesting practices.

A few environmental stakeholders offered qualified support for some operational aspects of the draft IFOA, such as clearer requirements for wildlife protections and tree retention, improved mapping of old growth and regrowth areas, enforceable harvesting limits and increased exclusion zones around threatened ecological communities (TECs). While seen as an improvement on present practices, environmental stakeholders largely felt that they were not adequate for achieving ecologically sustainable forest management.

Some environmental stakeholders noted an interest in remapping, they stated that this process would need to be:

- » Independent and rigorous.
- » Subject to clear and pre-agreed criteria and methodologies.
- » Open to genuine opportunities for local community input to develop and review maps.

Concerns were expressed that remapping was being considered as a way to secure additional areas to compensate for perceived shortfalls in timber supply.

³ **Environmental group** refers specifically to not-for-profit organisations with a stated mandate of protecting the natural environment

Feedback from submissions

Across both unique and campaign submissions, the focus on the environmental aspects of the draft IFOA overwhelmingly outnumbered submissions from the forestry industry. Stakeholder submissions varied in detail and length and fell into two distinct categories:

1. **Unique individual and peak group submissions** providing varied feedback on broader forestry reforms and/or the protocols and conditions of the draft IFOA. There were 419 unique submissions, with 85% representing environmental interests. Submissions from the forestry industry (34), apiarists (10), recreational forest users (4), local government (2) indigenous interests (2) and a range of other interests (13) including farmers and scientists were also received.
2. **Campaign submissions** from the forestry industry and environmental groups (7 different form submissions were received – see Table 1 and Appendix B). Of the 3,148 submissions, 2,729 were campaign related (87%).

Feedback received in submissions echoed the issues raised in briefing sessions, addressing the draft IFOA as well as broader concerns about the continuation of forestry in public native forests, Regional Forest Agreements (RFAs), wood supply arrangements and a lack of sufficient protection for habitat and threatened and/or iconic species across different land tenures.

Forestry industry submissions raised concerns that the conditions and protocols in the draft IFOA would have a detrimental impact on timber supply. They felt that there was an imbalance in protecting environmental values over and above sustaining the forestry industry. Industry stakeholders also expressed significant concern that a rigid application of threatened fauna species protections would place too many restrictions on harvest yields. Industry submissions noted that currently mapped sensitive environmental zones are likely to be inaccurate and include forests that could be used for timber harvesting.

The need for flexibility in enforcing the IFOA provisions was raised by industry in relation to operational matters such as the management of debris around retained trees. They also commonly raised operational boundary mapping, GPS error and the transferral of operational risks associated with forestry operations from FCNSW to contractors as key issues. This was seen as particularly important due to enforceability of the draft IFOA provisions, and the increase in Penalty Infringement Notice (PIN) amounts up to \$15,000 for errors in maintaining exclusion zones.

Campaign submissions by forestry industry employees and family and friends of forestry industry employees highlighted the importance of maintaining a sustainable industry for regional employment and for providing timber to the Australian market. Their submissions contended that the forestry industry maintains the social and economic fabric of rural and regional towns and employs up to 22,000 people in NSW.

Environmental stakeholders predominantly raised issues with respect to reduction of habitat protections for key species such as koalas, gliders, the Regent Honeyeater and the Swift Parrot. Other key concerns were:

- » Potential increased harvesting of environmentally sensitive forests due to proposed remapping/rezoning of high conservation protection zones. There were significant concerns that new mapping would reduce old growth forest by 78% and rainforest by 23%.
- » Loss of giant and hollow-bearing trees due to harvesting prescriptions.
- » Impact of doubling the intensity of forestry operations [by 50%] in the 'selective harvesting zone' on habitat complexity and connectivity, as well as lack of adequate monitoring and mitigation measures.
- » Potential for increased soil erosion, water pollution and weed growth due to allowing forestry operations on steeply sloping land (up to 30 degrees) and reducing stream buffers to 5m

(expressing the view that it should be 10 to 20m). There were also concerns this practice would impact threatened aquatic species, decrease protection of hollow bearing trees in adjacent gullies and effect connectivity between catchments.

- » Requirement to retain 10m² of basal area per hectare is well below a sustainable area for a diverse multi-age mixed species forest (should be 20m² ha).
- » Loss of requirement to undertake threatened fauna species prescriptions and pre-harvesting (wildlife) surveys.
- » Lack of identification or strategic consideration of all forest values including intrinsic ecological worth, social and spiritual benefits.
- » Inadequacy of current management and monitoring practices following forestry operations including managing weed infestation, and checking regeneration for germination rates and species diversity, particularly where more than 20% of the total basal area has been harvested.

The issues above were also raised in the three campaign submissions by environment groups. The environmental campaign submissions indicated a geographical distinction. Campaign letters from environmental groups in the North of the state highlighted major concerns with clear felling of northern coastal forests (specifically between Grafton and Taree), while the campaign submission submitted by southern-based environment stakeholders focused on the care and management of NSW spotted gum forests, in particular the forest adjoining Corunna Lake.

Among other interest groups who commented on the draft IFOA, were **apiarists** who wanted the new Coastal IFOA to be more sensitive to the coexistence of timber production and beekeeping. They requested greater protections for mature, flowering trees to enable nectar and pollen collection by honey bees.

There were two submissions by **Aboriginal stakeholders**. The New South Wales Aboriginal Land Council (NSWALC) provided a detailed submission outlining their significant concern that the new draft IFOA does not have any provisions for the protection of Aboriginal culture or heritage. They strongly rejected the position of the NSW Government that Aboriginal cultural considerations are better protected through extant legislation such as the *National Parks and Wildlife Act 1974* (NPWA). Other concerns raised in the submission were:

- » Lack of adequate consultation with Aboriginal communities or peak statutory bodies.
- » Potential for commitment to meet wood supply volumes to reduce environmental and cultural protections particularly in relation to the way Environmentally Significant Areas (ESAs) are mapped. The importance of old growth forests and rainforest as important cultural and economic resources for Aboriginal people.

The NSWALC recommended reinstatement of provisions for the protection of Aboriginal culture and heritage within the IFOA. At a minimum the NSWALC recommended this include provisions for Aboriginal cultural awareness training for FCNSW staff; best practice guidelines for the management and protection of Aboriginal cultural heritage including legislative requirements; and an acknowledgment of the full suite of forest values Aboriginal peoples hold in relation to forests.

A further submission from an individual of the Woppaburra people (Queensland) noted concerns about the impact of forestry operations on koala and bee populations.

Bellingen Shire and **Kyogle Council** submissions were concerned about the impact of the new IFOA on local waterways. They expressed concern with FCNSW prioritising harvesting yields over the protection of natural ecosystems.

A few **recreational** stakeholders commented on the need to ensure ongoing access to public forests and the maintenance of four-wheel drive trails.

1 Introduction

This report summarises stakeholder briefing sessions and submissions made on the draft IFOA during the public consultation period, between 15 May and 13 July 2018.

The NSW Government, as part of a package of regulatory reforms to forestry management in NSW, has prepared the draft IFOA to establish clear and transparent regulations for conducting native forestry operations on public land. Other key elements are to:

- » Deliver ecologically sustainable forest management through new multi-scale conservation outcomes.
- » Enable better monitoring and enforcement of regulations to ensure forestry operations conducted by the FCNSW and their contractors protect biodiversity and ecological values.
- » Facilitate species diversity through operational measures including permanent habitat protection.
- » Regenerate actively harvested forests, while maintaining an intensive harvesting regime.
- » Establish a transparent monitoring and reporting framework.

The new draft Coastal IFOA will replace the four current IFOAs applying to coastal NSW:

- » Upper North East region IFOA
- » Lower North East Region IFOA
- » Southern Region IFOA
- » Eden IFOA.

The overarching goal is to balance environmental protection and the economic sustainability of regional forestry operations with the commitment that the draft IFOA must not erode environmental values or lead to a net change in wood supply. This goal may be challenging to achieve as the NRC (2016) has identified the draft IFOA as having potential wood supply impacts in its Northern region.

The NSW Government conducted a wide range of consultation and engagement activities during the consultation period for the draft IFOA. The main avenues for feedback were seven briefing sessions across NSW and a public submission process. Section 2 of this report provides an overview of the consultation process and an overview of submission respondents.

A summary of responses from each of the briefing sessions is provided in Section 3.

Submissions were either unique responses or campaign submissions from environmental or forestry interests. Section 4 of this report provides an overview and analysis of the unique individual and peak group responses, while Section 5 provides a summary of the key points raised in each of the campaign letters. Appendix B provides an example of each of the campaign letters. Appendix C lists and identifies all submissions received unless anonymity was requested.

The issues raised and feedback provided in the public submissions process has been taken into consideration by the NSW Government in revising the draft Coastal IFOA.

2 Consultation overview

2.1 Briefing sessions

As part of the consultation, the NSW Government convened a series of briefing sessions targeting industry and environmental stakeholders across coastal regions in NSW. The briefings were delivered as a collaboration of the NSW Environment Protection Authority (EPA), Department of Primary Industries – Forestry (DPI), FCNSW and the NRC. The purpose of the briefing sessions was to provide an orientation to the draft IFOA conditions, protocols and key settings to assist stakeholders to make informed submissions as part of the exhibition process. Frequently asked questions from the briefings were also uploaded to the IFOA website throughout the submission period.

Invitations to the briefing sessions were sent to key industry and environmental stakeholders using lists held by the various participating agencies. The briefings occurred throughout the consultation period.

Table 1 Overview of briefing sessions and attending stakeholders

Location	Date	Environmental stakeholders	Forestry industry
Sydney	25 May	✓	✓
Grafton	29 May		✓
Port Macquarie	30 May	✓	✓
Lismore	4 June	✓	
Batemans Bay	7 June		✓
Narooma	7 June	✓	
Eden	8 June		✓

The briefings process was one of the various means of consulting on the draft IFOA. Supporting material was also posted on the IFOA website, including videos, briefing session presentations, frequently asked questions and case studies.

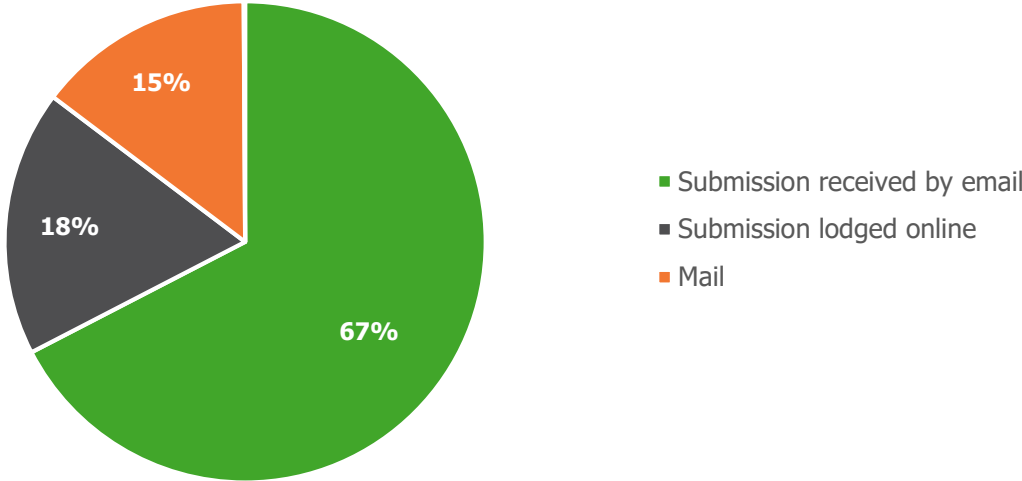
2.2 Submissions

The NSW Government allowed several avenues for detailed submissions to be made. This included, providing a mailbox where questions were answered and where stakeholders could request and receive detailed feedback on technical aspects of the draft IFOA. Submissions were accepted by email, post, and by responding online (to a simple form with structured questions and/or attaching additional material).

The NSW Government received a total of 3,148 submissions. Of these, 419 (13%) were unique individual and peak group submissions and 2,729 (87%) were campaign submissions.

As shown in Figure 1, two thirds of submissions were made by email (2,124). The remaining stakeholders completed the online survey (564), sent in their submissions by post (460). It should be noted that a high number of online submissions attached either campaign letters or supporting documents as their main feedback.

Figure 1 Submissions by response method (all submissions)

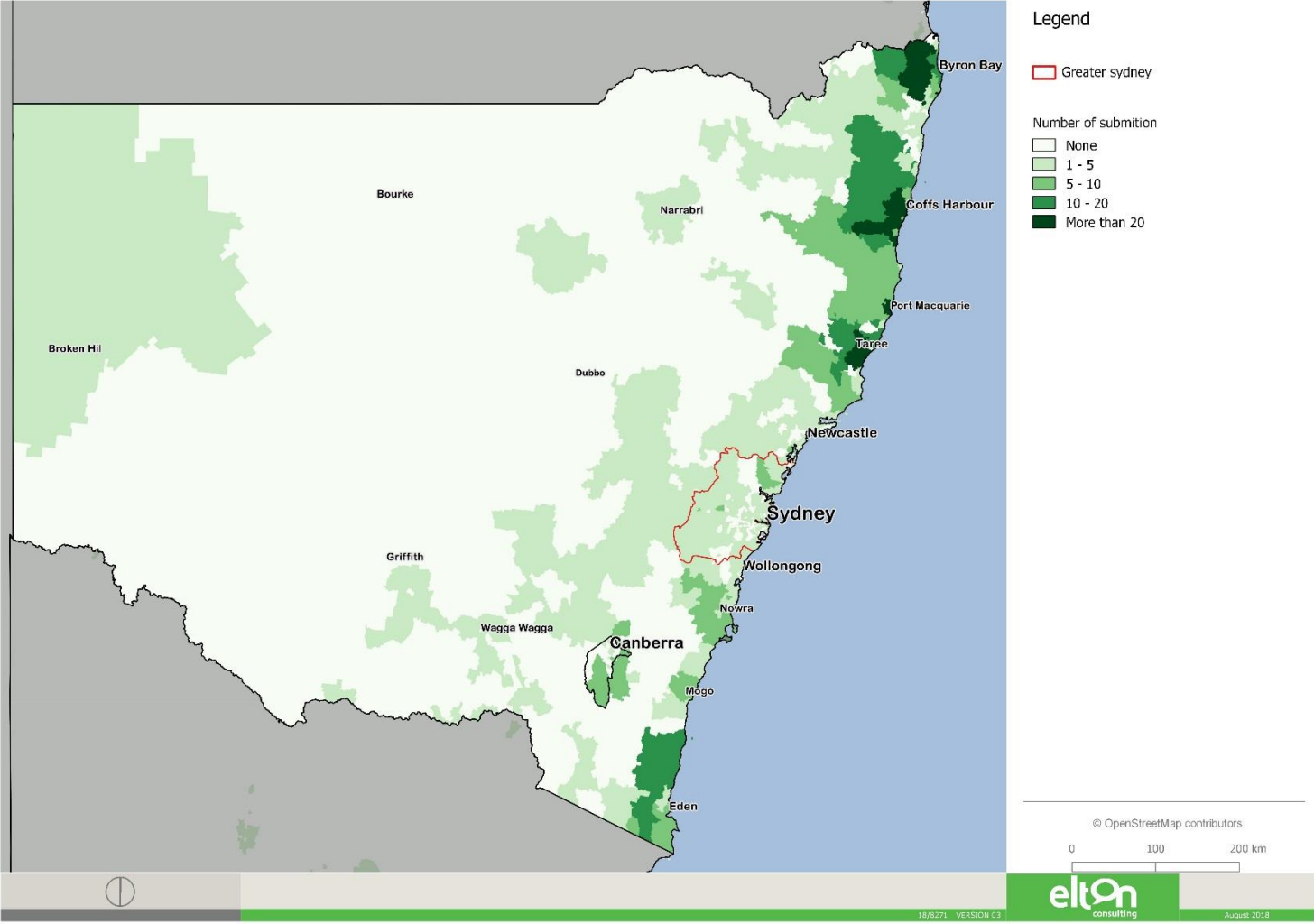


Roughly half (46%) of all submissions that included an identifying postcode came from the NSW north coast (postcodes above Newcastle), as shown in Figure 2 (following page). Submissions from NSW with postcodes below Wollongong represented a further six percent of submissions. While just over a quarter of submissions with post codes (28%) were from the Greater Sydney Region (see boundary in Figure 2). The following table provides a summary of the distribution of all submissions:

Table 2 Geographic distribution of submissions (by post code)

Location	Submissions
New South Wales	1,258
Victoria	31
Queensland	18
South Australia	5
Western Australia	3
Tasmania	2
United Kingdom	1
United States of America	1
No postcode recorded	1,829

Figure 2 Geographic distribution of NSW submissions with postcode provided (1,258 submissions)



Unique submissions

Of the unique submissions received, interested members of the community (individuals) represented 78% of submissions (325), followed by forestry industry groups (30) and environmental groups (27). This is shown in Table 1.

Table 3 Unique individual and peak group submissions by stakeholder type

Sector / interest area	Submissions	
	#	%
Individual	325	77.6%
Industry group – forestry and allied services, apiarists	30	7.2%
Environment group	27	6.4%
Community group	14	3.3%
Forest user group – recreational	9	2.1%
Local government	2	0.5%
Aboriginal group	2	0.5%
Other	10	1.9%
Total	419	100%

Shown in Table 4, unique submissions were predominantly focused on the environment (85%) with forest industry sector submissions making up 8% of the unique submissions.

Table 4 Unique individual and peak group submissions by interest area

Interest area	Submissions	
	#	%
Environment	356	85.0%
Forestry	34	8.1%
Apiarists	10	2.4%
Recreational	4	1.0%
Government	2	0.5%
Scientist / academic	2	0.5%
Other	11	2.6%
Total	419	100%

Campaign submissions

The majority (87%) of all submissions were a variant of one of seven form or campaign submissions, with most (71% of all submissions received) expressing strong concern for North Coast forests that are subject to forestry operations.

Table 5 Campaign (form) submissions

Campaign interest group	Submissions	
	#	%
1. Environment – North Coast Region	2,251	71.4%
2. Environment – North Coast Region version 2	82	2.7%
3. Environment – South Coast Region	17	0.5%
Total environment campaign submissions	2,350	74.6%
4. Forestry business	85	2.7%
5. Forestry business – version 2 (abridged)	5	0.2%
6. Forestry employee, friend and family	224	7.1%
7. Forestry employee, friend and family + online form	65	2.1%
Total forestry campaign submissions	379	12%
TOTAL campaign submissions	2,729	87%

3 Feedback from briefing sessions

Stakeholder feedback received at the briefings was relatively consistent across various locations, according to stakeholder type and is summarised below. While some of the feedback was focused on the draft IFOA, many of the issues raised addressed broader issues related to RFAs, wood supply agreements and legislation designed to protect threatened and/or iconic species.

3.1 Sydney

Forestry industry groups and individuals

The primary concern of industry representatives was that the draft IFOA would lead to a reduction in wood supply in key locations. They noted that supply impacts would be exacerbated by the following: buffer zones, koala protection areas/zones, increased numbers of threatened species and communities and riparian protection requirements; all contributing to reducing the overall area available for harvesting. Industry stakeholders felt that the draft IFOA was being driven by environmental considerations and pressure from green groups at the expense of the forestry industry. An industry, they noted, as being an important economic and social contributor to regional communities.

Forestry industry representatives commented that there was a poor public understanding of what constitutes old growth forest and regrowth forest and the long-established role of public forests in providing a secure wood supply for consumers. It was suggested that the use of the term 'non-regenerative forest' may help to engender a more realistic community understanding of the key sources of timber for NSW.

The impacts of koala mapping on timber supply was described as 'an unknown' by forestry industry stakeholders. They requested that detailed maps of these areas be made available to the industry, as a critical tool for ensuring that forestry operations could continue on a sustainable economic as well as ecological footing.

Industry representatives also commented that they believe there is a lack of clear data, therefore it is important to articulate if the new Coastal IFOA will result in no net change in timber supply or no net reduction in timber supply.

Forestry stakeholders encouraged ongoing engagement of industry groups, on-the-ground contactors and saw mill operators throughout the forestry reform process and preparation of the IFOA. They sought further clarity on the following aspects of the draft IFOA:

- » The 10% harvesting limit and overall 2200-hectare limit.
- » Likelihood of having usable logs after two x 10-year rotations.
- » Definition of hollow-bearing trees to ensure agreed understanding of what needs to be retained.
- » Buffer areas around Threatened Ecological Communities (TECs).
- » Who is responsible for checking presence of koalas – FCNSW or sub-contractors?
- » Does every tree with a koala need to be retained?
- » Why are areas of old growth forest not included in the basal area calculation?
- » Accuracy of GPS and determining the location of retained trees when regrowth occurs.
- » Implications for fire management and use of fire as an active management tool.

- » Fire management in riparian zones.
- » Contribution of adjacent reserve areas to intensive harvesting cycle and habitat and tree retention at the local landscape scale.
- » Categorisation of streams and whether this picks up depressions and overland flow areas.
- » Greater guidance and alignment between EPA and FCNSW on defining rocky outcrops and cliff features and associated exclusion zones is required.

The remapping of old growth forests was supported with a request that industry be consulted as part of this process. It was suggested that the team also look at the Victorian regeneration assessment tool.

Environmental Defenders Office New South Wales (EDO NSW)

The EDO NSW was the only peak environmental group to participate in the draft IFOA briefing sessions. Other peak environmental groups declined to attend and queried the authenticity of the consultation process.

The EDO NSW conveyed the concerns about the lack of genuine consultation with broader community groups, including environmental organisations on the development of the draft IFOA. EDO NSW expressed the view that community groups have been excluded from meaningful discussions and their only opportunity for input is to comment on decisions that have already been made. Even then, there was the feeling that there is little evidence of the Government responding or changing proposals based on feedback received during consultation processes.

The perception among the environmental stakeholders is that the forestry agenda is being driven primarily by industry. It was noted that this appeared different to how the original IFOA was developed 20 years ago when there was widespread consultation with environment groups in developing the documents.

As part of the draft IFOA, the NSW Government has incorporated the NRC proposal to undertake remapping of old growth forest with new technology to identify if it can be reclassified to support additional timber harvesting. If there is to be a remapping process, the EDO believes there should be input from environmental stakeholders into developing and reviewing the maps. There is significant cynicism among environmental stakeholders about the remapping process, with the view that it will lead to the harvesting of old growth forests and rainforests. Prior to the remapping process, the EDO believes that there should be a conversation about the potential areas that could become available for the forestry industry to obtain additional timber, and whether industry will receive wood supply from elsewhere, if the remapping process determines that areas of old growth forests are more extensive than currently mapped. It was EDO NSW preference that this discussion is had now.

The EDO commented that the environmental groups they work with are of the view that native forestry practices are unsustainable and there should be a greater focus on plantation timber to supply market needs. Other issues raised by the EDO were the need to have all current and future koala protection initiatives fully accommodated within the new Coastal IFOA. In noting this it was emphasised that species protections were a much broader matter than the IFOA and requires additional consideration by the NSW Government.

3.2 Northern Region – Grafton

Forestry industry groups and individuals

The key issue raised by attendees at this session was the potential for cumulative protections and exclusion zones to impact upon the area available for timber supply. Of concern was the growing numbers of TECs being identified within the forest estate. Suggestions related to this issue included:

- » Special provisions for where coupes were adjacent to reserves and national parks.
- » The potential for offsets to harvest elsewhere where several exclusion zones may reduce supply.
- » The workability of requirements to temporarily cease harvesting operations in compartments within a 5km radius of an area where black cockatoos are sighted.

Generally, this group saw benefits in the draft IFOA to clearly set out expectations for all as to how operations should be undertaken. The protocols and conditions within the current IFOAs were described as open to widely differing interpretations, which has led to ongoing contestation at the regional and state levels. Similarly, poor monitoring and reporting was also seen as negatively impacting upon public perceptions of native forestry. The enhanced requirements for timely monitoring and reporting within the draft IFOA were viewed as creating an evidence base that could serve to:

- » Adapt practices where required.
- » Understand the actual status of timber supply.
- » Secure long-term protection of retained trees.
- » Identify actual environmental outcomes.
- » Assist in compliance and enforcement.
- » Restore confidence in the sector.

Other aspects that were favourably received included:

- » The shift to LIDAR-based mapping to identify watercourses.
- » The creation and better definition of riparian exclusion zones, buffer zones and boundaries for protection areas.
- » Having retained trees in clumps would deliver improved environmental outcomes.

For the new Coastal IFOA to be successful there will need to be significant investment in good quality information and training to assist contractors to implement the new conditions and protocols.

Questions remained as to how the new Coastal IFOA will deal with:

- » Basal area requirements and how these differ to what is in the PNF Code?
- » Whether retention areas are in addition to identified exclusion zones for TECs?
- » The use of pre- and post-harvest burning as a management tool.
- » Clear definitions of bankfull for riparian areas and the status of unmapped watercourses.

The NRC proposal for remapping old growth forest was welcomed and industry involvement in this process was seen as essential. It was commented that 'ground truthing' old growth forest and regrowth areas was overdue and there are presently too many misunderstandings about the value of these areas within the forest estate.

3.3 Mid-North Region – Port Macquarie

Forestry industry groups and individuals

The key concern of forestry industry representatives in Port Macquarie was whether the limits proposed under the draft IFOA would result in no net loss of wood supply at the local level and not just the regional level over the life of the IFOA. Certainty of supply was viewed as necessary for industry in this area.

It was noted that good silvicultural practice was consistent with environmental stewardship, a sustainable forestry industry and regional economy. Attendees considered industry needs to be given the rules and then allowed to get on with their job.

Other comments included:

- » Tree retention was not just about numbers of trees, it should also include mix of the right species for a landscape.
- » Communication about the proposed changes being made through the draft Coastal IFOA should not just focus on industry. The broader community needs to have access to simple and clear information on new protections in the Coastal IFOA.
- » Clarification is needed as to whether calculations for clearing within coupes includes access for machinery, storage and roadways.
- » Koala protections and policy is confusing as there is so much reform happening in this area at the moment.
- » The need for conditions to address changes in soil type, adjacency to slopes and other landscape characteristics.

In closing, industry representatives emphasised the importance of remapping and local industry involvement in any remapping process.

Environmental groups

Only one representative of an organisation with a particular interest in koala preservation attended this briefing. They expressed concerns about koala numbers in the area and the impacts of forestry, urban development and roadways upon koalas. They noted that while the draft IFOA contained specific koala protections, their effectiveness would need to be monitored, and, over time, the IFOA would need to adapt to respond to new legislation and emerging science about koalas.

Other questions and comments included:

- » What would be the changes in forestry practices in coupes adjacent to reserves, national parks or private land that had known koala populations?
- » That retention of trees was not just a matter of basal area but also ensuring a range of koala habitat and feed trees were preserved.

3.4 Northern Region – Lismore

Environmental stakeholders

Representatives at this meeting expressed strong reservations about the NSW Government's approach to consultation on a range of forestry-related matters. They described the consultation process as a 'rubber stamp' exercise that bypasses the needed debate about how public native forests should be managed. Environmental stakeholders described forestry operations in native forests as unsustainable

and opposed anything that enabled intensive harvesting on public land. They strongly expressed the view that the forestry industry needs to move to plantation timber.

Environmental stakeholders also queried the status of advice to the Government from the NRC on the draft Coastal IFOA settings. They stated that, while remapping old growth forests would update the knowledge base regarding forests, the methodology and process for remapping would need to be transparent and highly consultative at a local level. Concern was expressed that the remapping was driven solely by a need to secure additional timber supply.

Comments and questions raised that related directly to conditions and protocols in the draft IFOA included:

- » The 3 x 10-year cycle rotation needs to be longer.
- » The rationale behind basal area retention should be clearly explained as it is not easy to establish what this is trying to achieve given it could be to retain a small number of large trees or a large number of smaller trees.
- » The utility of retaining clumps is debatable; if they are too dispersed and disconnected they won't provide any protection or refuge during operations.
- » Where clumps are protected, what measures will be put in place to ensure they are retained over the long-term?
- » The draft IFOA is just focused on operations, it should also prescribe ongoing management. For example, management of lantana is a major problem in the north, as is bell miner associated dieback (BMAD). The new Coastal IFOA should incorporate work by Wayne and Susan Somerville on BMAD.
- » It should not be up to contractors to make decisions about the presence of koalas during operations.
- » Riparian protections are inadequate particularly for high rainfall areas. They should be in the order of 20 metres rather than 5-10 metres.
- » There is little guidance as to the status of unmapped watercourses and how these will be protected.
- » Monitoring is critical and has been lacking to date. Will there be community participation in any monitoring committee?
- » Is there a role for the NRC in overseeing ongoing monitoring?

3.5 Southern Region – Batemans Bay

Apiarists

Apiarists noted that they were not consulted in the development of the draft IFOA prior to the public consultation, yet many of the conditions and protocols outlined in it have implications for beekeeping. Key concerns raised included:

- » When looking at what trees need to be retained, consideration has to be given to preserving trees from a range of species and ages to secure a diverse range of flowering sources and times for bees.
- » Species mix should also be a key consideration in managing regrowth areas.
- » Roads to beekeeping sites need to be better maintained after harvesting operations (and set down areas) as they are often left in very poor condition.

- » Isolated clumps may be beyond the 1km flight path of bees.
- » Bee keepers are paying for sites where there is no flowering or little flowering occurring.
- » Regulations and legislation should recognise beekeeping and forestry as co-dependent industries.
- » There should be exemptions from the forest management zone for beekeeping.

Forestry industry groups and individuals

The key focus of discussion by forestry industry stakeholders was the need for the new Coastal IFOA to promote active management of forests not just in the harvesting phase. It was noted that some of the healthiest forests on the south coast are those that were harvested 30 years ago. Clarification was sought as to whether the definition of harvesting extends to covering thinning practices.

There was a strong view among industry stakeholders that active management of the whole estate is required. They felt that the 'lock it and leave it' approach to reserves isn't working and specifically identified active fire management as critical for managing the understorey. They recommended light burning in the early stages of regrowth to support species diversity and growth.

Other issues raised included:

- » Basal area calculations may not achieve a balanced outcome if it means that lots of immature or small diameter trees are retained.
- » An agreed definition of rocky outcrops and exclusion zones is needed even then there may be a requirement for some flexibility if a machine needs to go close to an outcrop to get to an area for harvesting.
- » Errors with GPS is a real problem in this area. Contractors want to do the right thing but often systems may be up to 10 metres out.
- » Clarification of the relationship between the designation of rare forests and areas defined as TECs. Attendees noted there was still confusion about TEC mapping.
- » Prohibitions on collecting firewood beyond 20m from a road need to be relaxed. It is sustainable use of product that is only going to waste.

3.6 Southern Region – Narooma

Environmental stakeholders

Some attendees noted their opposition to any harvesting of native timber citing concerns relating to:

- » Climate change.
- » Destruction of habitat.
- » Loss of landscape values.
- » Impacts on tourism throughout the region.
- » Impacts on water quality in rivers, lakes and ocean environments.

They felt that changes to the IFOAs shouldn't be driven by reducing cost for Government and industry, but rather the primary objective should be about producing better outcomes for the environment. Environmental stakeholders would only accept a new Coastal IFOA if it guaranteed better outcomes for wildlife than the current approvals. Key concerns noted were:

- » The number of animals lost as a direct consequence of harvesting.
- » Lack of investigation and enforcement of forestry regulations occurring across the region.

Other issues raised included:

- » A desire to see more effective consultation and communication with people in regional areas.
- » While koalas are an important species, there is a need to protect the diverse and significant array of endemic flora and fauna in southern forests.
- » Need to tighten up the definition of suitably qualified person to undertake wildlife searches in harvesting.
- » The adequacy of the basal area to be retained.
- » If hollow-bearing trees are part of clumps they may be of value however, on their own, dispersed across a harvested area they may have little utility for wildlife.
- » Has there been an assessment of the future value of forestry versus tourism?
- » Need for greater investment in science and monitoring to improve forestry practices.
- » Fire management is an issue as regenerated forest is particularly prone to fire in the first few years.
- » The NRC should also remap the extent of old growth forest in the southern region.
- » Would like to see plans to harvest in proximity to Lake Corunna stopped until the new Coastal IFOA conditions and protocols can be applied, but this should not be interpreted as endorsement of harvesting in this area.

3.7 Southern Region – Eden

Forestry industry groups and individuals (including apiarists)

The session opened with a discussion about security of supply for the timber industry in Eden. It was noted that:

- » Current wood supply arrangements are not working and this is creating a lot of uncertainty for many in the community.
- » Conditions and protocols in the new Coastal IFOA will serve to further restrict what little supply is left.
- » Supply is mostly being drawn from regrowth and log sizes are close to being not suitable for sawmilling.
- » The new Coastal IFOA should not be finalised before new wood supply agreements are developed. The process is not in logical order. The new Coastal IFOA needs to meet the present allocation. If it can't then it doesn't address the twin commitments.
- » There should be immediate remapping of the south coast area to free up known regrowth areas that have been incorrectly identified as old growth.
- » Ongoing and regular monitoring is required so there can be a better understanding of available supply.

IFOA-specific commentary and questions addressed the following:

- » Under the landscape approach is there a mechanism available to open up other land to compensate for land locked up for koalas and threatened species?
- » Can the buffers and rocky outcrops be better defined to avoid a recurrence of the recent court case?

- » Retention of clumps to maintain hollow bearing resources will potentially remove an even more disproportionate number of merchantable trees.
- » There are particular harvesting practices using 'Forders'. We may not be able to manoeuvre these machines downhill below clump areas to extract the available resource.
- » Will areas adjacent to national parks and reserves be taken in to account when developing the landscape approach to harvesting?
- » What is the relationship between the IFOA and bushfire codes? Will it limit the ability to use burning as a management tool?
- » Basal area is not practicable on the south coast. Stems per hectare may be a better measure.
- » Existing provisions for alternate coupe logging need to ensure that management borders are rational and workable.
- » GPS is unreliable in this area. The iPads supplied by FCNSW can be quite out at times. We need to ensure access to better technology to ensure accuracy where boundaries are enforceable. This is critical in this region where a lot of work can be done at night.
- » Need to remove serial approvals from the process they are quite onerous. The space is over regulated and the EPA doesn't understand the realities of what is required to harvest timber.
- » If there is a breach, does responsibility lay with the contractor? Contractors should not be liable for poor quality information and technology provided by FCNSW.
- » Concern about how the EPA regulates forestry operations and potential to take strict action against contractors.
- » Training of contractors will be needed to ensure they understand the new operating environment.

Other suggestions included:

- » A call for an extension to the consultation period given it is running in parallel with the Forestry Legislation Amendment Bill.
- » It would be good to have a local FCNSW representative present at meetings like today.
- » Local contractors want to see a FCNSW and DPI forum on wood supply.

4 Feedback from unique submissions

All unique submissions were coded to consistently record and reflect views expressed, using the attached coding framework (see Appendix A). This includes additional comments attached to campaign submissions.

The unique submissions were predominantly from environmental stakeholders, although comments were also received from the forestry industry and to a less extent from other stakeholders. The majority of submission comments could be analysed in relation to the draft IFOA principal themes: species and habitat, harvesting limits and implementation arrangements.

Quotes used throughout the report are illustrative of overall sentiment, recommendations and ideas raised.

4.1 Overall sentiment on the draft Coastal IFOA

Across all the submissions there was a clear split in sentiment reflecting whether the submitter identified as having an environmental interest or generally supported the forestry industry.

Environmental stakeholders indicated a general dislike for logging of native forests on public lands and therefore rejected the basis for the IFOA. They also expressed more specific concerns that the IFOA permitted greater harvesting intensity and did not sufficiently protect environmental values, threatened species or ecosystems.



NSW's public forests are an intrinsic part of the State's biodiversity reserve system and are crucially important as:

- *major refuges for biodiversity;*
- *supporting core populations of threatened species;*
- *maintaining genetic diversity in plant and animal populations; and*
- *expanding, buffering and linking the State's formal reserve system.*

[Submission #1836]

Our forests need to be managed for all its attributes including wildlife, water (rain attracting and water holding) and our well-being for spiritual and visual and recreation reasons and for the synergistic function of the ecosystem that supports human life (oxygen, carbon sink, and drinking water for a large coastal human population). The timber production has not been sustainable with quotas unable to be supplied and sawlogs getting smaller and machines getting bigger and jobs being lost. Our very future is dependent on sustainable forest management for all its values not just logging.

[Submission #2442]

Key issues that were canvassed by environmental stakeholders were:

Inadequate protection of terrestrial and aquatic habitat

Environmental stakeholders were concerned with the reduction in habitat such as old growth forests, giant trees and hollow-bearing trees on populations of threatened species such as: koalas, gliders, the Regent Honeyeater and the Swift Parrot. Another key concern was the reduction of protection of

stream head waters with many stakeholders seeking better protection for riparian zones to provide habitat for threatened aquatic species and reduce impact on downstream users.



We object to proposed reduction in watercourse buffers which will leave these important and strategic habitat corridors increasingly unprotected and prone to increased weed invasion. Some watercourse areas retain the best forests elements and an adequate riparian buffer zone is critical to their longer-term ecological protection. Improved mapping techniques must be used to ensure an improved ecological protection of watercourses, not to facilitate expanded logging areas. All watercourses must have at least a 10m buffer protection area.

[Submission #2390]

Objection to implementation of the intensive harvesting zone

There was a major concern among environmental stakeholders in respect to increased intensive and selective harvesting, particularly the proposition to 'clearfell' northern coastal forests between Grafton and Taree. There were also concerns expressed about the removal of requirements to retain recruitment and nectar trees as well as better mandate protected elements within the intensive zone.



The implementation of the intensive zone will result in the rapid homogenisation of large swathes of forests at the landscape and stand scale, summarised thus by a member of the expert panel: "it must be clearly understood that these proposed intensive harvesting practices are effectively clear felling diverse native forest to replace with even age native plantations in a deliberate manner."

[Submission #2430]

Wildlife habitat clumps and tree retention clumps don't take into account the impact of habitat fragmentation, and are too small to be of any benefit. Many species can not handle having large gaps between patches of habitat. Fragmentation completely changes the types of species that can use the habitat left.

[Submission #2378]

Removal of pre-logging surveys

Environmental stakeholders were unhappy with the lack of requirement for pre-logging surveys to identify threatened species and the potential for sensitive forests to be remapped to support increased wood supply. They also noted that monitoring and enforcement of forestry regulations was inadequate and unlikely to be improved by the draft IFOA.



The new proposals are a fundamental shift from the last 20 years of management that remove the need to survey and protect occupied habitat, for most threatened species. The changes are supported by almost no data.

[Submission #2341]

Forestry industry stakeholders had more neutral or mixed responses to the draft IFOA. They noted the importance of balancing ecological values and industry sustainability, while expressing concern that the commitment of 'no net wood loss for industry' would not be met.



The proposed IFOA's are clearly designed around enforceability rather than improved practices and outcomes. Of particular concern is that there are two public agencies, Forestry Corporation and EPA charged with supervision of timber harvesting practices which at best is wasteful and at worst likely to prove counterproductive.

[Submission #2397]

Overly prescriptive and inflexible regulatory regime

Industry stakeholders were concerned that the draft IFOA represented over-regulation of the industry which would increase the cost of forestry practices. There was support from industry however that the draft IFOA represented greater regulatory clarity and transparency.



The main concern about the continued IFOA regulatory approach is that it endeavours to deliver an outcome to environmental detractors rather than validate that forestry can operate as a renewable and sustainable activity with improved environmental values. Ever increasing regulation seems to correlate with the politicisation of forestry operations in concert with the philosophy demonstrated by some government agencies that oppose in principle any forestry practices. It is apparent that the proposed changes are more about appeasing those who oppose any form of forestry than the science.

[Submission #2452]

The draft is a highly prescriptive instrument under which there is very limited operating discretion.

[Submission #2397]

Need for new technology and remapping of existing boundaries

Operational boundary mapping and GPS error was regularly raised as a key issue of the IFOA by industry. Some industry stakeholders felt that harvesting limits were artificially constrained by incorrect classification of old growth and rainforest areas.



There needs to be a tolerance placed into the IFOA for operators regarding GPS Accuracy. ... Operators will take the cautious approach along streams and not push the "boundaries" to get the timber, which in turn we will lose timber volumes.

From experience in the industry a lot of mapped Rainforest areas don't meet the criteria for Rainforest and have a lot of wood that should be available for harvest.

[Submission #2386]

4.2 Guided submission responses

Close to two thirds of unique submissions answered the guided questions, with varying degrees of detail. Below is a summary of responses to the questions:

Question 1. Most important parts of the draft Coastal IFOA

Key considerations for environmental stakeholders was protection of threatened species, koala habitat, biodiversity at landscape scale and ensuring preservation of old growth forests.



Impact on forestry management practices related to clear felling, harvesting immature/ small sized timber, inadequate protection of waterways, inappropriate overuse of herbicides for weed regrow this after harvest, inadequate protection of habitat.

[Submission #2371]

Those parts allowing logging of old growth timbers. Those parts allowing logging closer to waterways than previously. Those parts allowing habitat fragmentation which will destroy wild life communities. This is all contrary to the best scientific guidelines on management of healthy environments.

[Submission #2413]

A number of environmental stakeholders were specifically concerned about the potential for increased logging intensification within the former northern region of the IFOA and strongly supported a shift to plantation timber.



I am very concerned about the intensification of logging throughout the 140,000 ha zone between Taree and Grafton. The draft IFOA will allow an increase of approx. 50% more logging. Clear felling will now be allowed at 2,200 hectares per year in 45ha coupes. This is a 180 fold increase in clear felling. This is clearly not environmentally sustainable.

[Submission #2393]

The clear felling of old growth forests esp between Grafton and Taree. This is a subsidised industry. Plantation wood is now excellent. This industry must end.

[Submission #2411]

Others felt that the IFOA, while it could be more robust, was moving in the right direction with respect to protecting ecological values of native forests:



I am concerned about habitat loss and fragmentation. I think that this IFOA is generally a positive plan, however I feel that as a forestry management plan needs to ensure more robust conservation outcomes in the face of increased deforestation generally due to urban development and reduced controls on broadscale farmland clearing

[Submission #2382]

The ability of the draft Coastal IFOA to maintain and improve long term state ecological biodiversity values as these are vital to be conserved for their own sake and the benefit of future generations. It appears to attempt this with a multi-scale approach.

[Submission #1957]

Submissions from industry stakeholders tended to be concerned that the balance between environmental protection and maintaining a sustainable forestry industry has shifted too strongly towards ecological interests.



Protecting our already dwindling timber supply available for logging. For years the area available for harvesting has been getting less and less (taken for National Parks). A loss of timber supply amounts to a loss of jobs.

[Submission #2386]

In the draft the number of species specific conditions for fauna has grown. These conditions are unduly prescriptive and complex. Threatened fauna species should be detailed in the Protocols rather than the Conditions in recognition of their changeable status.

[Submission #2452]

[Company] is interested in entire draft Coastal IFOA and considers all parts to be important. As a regulatory instrument IFOAs are a critical determinant of the timber industry's continuing commercial viability and its vital importance to regional economies in NSW. All sectors within the NSW hardwood timber supply chain will in some way be affected by the IFOA remake.

[Submission #2391]

An alternative perspective was provided by apiarists. Most important to them was:



Access to Bee Sites to enable us to continue to have strong bees for pollination and honey production.

[Submission #2433]

Question 2. What parts will have a positive outcome on environmental values or sustainable timber production?

In general, most environmental stakeholders did not see the IFOA as having any positive value due to the potential impact on ecological systems. There was reiteration of the opinion that harvesting native forests are unnecessary for maintenance of a sustainable timber industry:



Based on the information in the draft Coastal IFOA there will be a negative outcome on the environment at multiple scales. There is nothing sustainable about the methods of timber harvesting that are proposed. It clearly shows that the intent is to move away from rules and instead use guidelines that are flexible and would suit to benefit logging and business at the expense of the environment.

[Submission #2381]

There is no positive outcomes for the environment with this plan. Proposed mapping by NRC has reduced old-growth forest by 78% and rainforest by 23%. Areas of previously protected old growth are to be revoked such as in the public reserve system and exclusion zones. Stream buffers are to be reduced to 5 metres from the centre of the waterway. Not only does this lead to more soil erosion and degradation of water quality but reduces the protection of large hollow bearing trees in those gullies.

[Submission #2393]

A few environmental and industry stakeholders noted the following potential positive outcomes:

- » Maintaining jobs in local, regional areas.
- » Ease of enforcement.
- » Consideration of ecological value.
- » Identification of Environmentally Significant Areas, boundary rules, nomination of tree clumps and new basal area limits.

A detailed submission by a timber flooring and decking company notes the value of the draft IFOA in terms of the clarity of its rules and regulations.



[Company] support the need for an effective regulatory instrument that maintains forest values in accordance with ecologically sustainable forest management (ESFM) principles. [Company] also recognises the value of operating rules which are transparent and easy to interpret. The consultation draft is much easier to read and interpret than the existing IFOAs. The new layout is also an improvement allowing detailed information to be more easily found. Splitting the instrument into Conditions and Protocols is supported as it will enable prescriptive details to be more easily updated. In terms of enforceability there can be no doubt that the draft is water tight comprising almost 250 pages of detailed regulation.

[Submission #2391]

Question 3. What parts will have a negative outcome on environmental values or sustainable timber production?

Aside from stating that all of the draft IFOA will create negative outcomes, submissions from environmental stakeholders identified the following specific concerns:

- » Harvesting of old growth forests due to the lack of adequate or accurate mapping data.
- » Loss of giant and hollow trees due to disturbance by the forestry industry.
- » Increasing logging intensity [by 50%] will reduce habitat complexity and connectivity and cause impacts before they can be clearly monitored and mitigated.

- » Permitting logging on steeply sloping land (above 30 degrees) will lead to soil erosion, water pollution and weed growth.
- » Reducing stream buffers to 5m (should be 10-20m) will decrease connectivity between catchments.
- » Habitat loss and fragmentation will lead to loss of biodiversity values.
- » Loss of requirement to undertake threatened fauna species prescriptions and pre-logging (wildlife) surveys.
- » Lack of consideration of all forest values including intrinsic ecological worth, social and spiritual benefits.
- » Inadequacy of current management and monitoring practices following logging.

Environmental stakeholders specifically noted that monitoring of regeneration is not being done where logging more than 14m² basal area is left. This was seen as inadequate, with stakeholders recommending that checking regeneration for germination rates and species diversity should be done where more than 20% of the total basal area has been logged. They further recommended that checking regeneration should be increased to at least 18 months after a post-harvest burn rather than 12 months, as currently stipulated in the draft IFOA.

Other specific concerns include:



A retention of 10sqm of basal area per hectare is well below a sustainable area for a diverse multi age mixed species forest.

[Submission #2328]

The draft Coastal IFOA does not have a planning tool for evaluating the current value of forests and the significant value of retaining them intact for the centuries to come. It would appear to provide a framework for patchwork removal of forest resources. It does not have a strategic value for replanting and enhancing forests.

[Submission #2383]

Forestry industry submissions also noted a number of specific concerns including:

- » GPS accuracy and the lack of tolerance in the IFOA for any error, particularly as there is an increase of up to \$15,000 per PIN.



Operators need the confidence to use a GPS to locate streams without having to worry when the EPA audit their works at a later date that they have breached the 5m Accuracy rule and effectively get a PIN.

[Submission #2386]

- » Need additional flexibility in respect to managing debris around retained trees to ensure impacts are not worse from flattening or removal of debris.



Perhaps a solution is to reduce the area around the tree from 5 m to 2 m?

[Submission #2386]

- » Inaccuracy of current mapping of threatened ecosystems limiting available harvest.

Question 4. Views on the effectiveness of multi-scale protections?

There was significant cynicism among environmental stakeholders on the efficacy of multi-scale protections. Aside from the general comment by environmental stakeholders that all of the forest should be protected, the following concerns were noted:

- » Unsustainable quotas.

- » Lack of action and trust regarding enforcement of regulatory breaches.
- » Lack of permanent protection for old growth forests.
- » Environmental protections in the IFOA are based on little baseline data and poor, past monitoring practices.



326 species of threatened plants and 23 animal species will have their protection removed Large eucalypt feed trees can now be logged reducing available nectar resources for birds and bats. These coastal forests are essential for the survival of many birds as they migrate up the coast such as the swift parrot and regent honey eater. The loss of bird and fauna will lead to further degradation of the forests as they are the agents of pollination.

[Submission #2381]

- » Does not take into account other threatening processes (land clearing) and the need for national, state-wide habitat protection.



Multi-scale protection is very important. But harvested areas need to be much more restrictive. Nobody believes that the 'permanent protections for native plants and animals' is possible within this extensive area. If this plan goes ahead it is with the understanding that our wildlife will suffer. E.g What is the point of keeping hollow bearing trees in the middle of a bare landscape leaving animals open to all sorts of dangers.

[Submission #2334]

Environmental stakeholders also noted that protections were only as strong as the level of accountability and enforcement of illegal practices. They felt that the industry often acts as a law unto itself with a culture which ignores the need for genuine scientific environmental assessments to ensure adequate protection for wildlife and discourages the development and application of other environmental safeguards. They felt that there would be ongoing issues with supervision and compliance if left to employees of FCNSW or commercial operators rather than independent scientifically trained personnel.

Forestry industry stakeholders expressed some concern that the multi-scale protections could be manipulated to reduce available areas of harvesting and were excessively regulated by the EPA to only focus on environmental values.

One apiarist noted that there is a 'need to consider tree flowering cycles as different soil types grow different trees.'

A few submissions noted that the question itself was poorly worded and leading.

Question 5: Would it be effective at managing environmental values or sustainable timber industry (unique submissions)

Of the 214 unique stakeholders that responded to question 5, the majority (195) felt that the IFOA would not be effective at managing the environment and/or supporting a sustainable timber industry. Only six of the respondents felt it would be effective at one or both.

Concerns raised by environmental stakeholders included:

- » Loss of species diversity, genetic diversity and mature trees with particular concern for harvesting of northern blackbutt forest reserves.



The current IFOA recommending intensive logging harvest will result in "quasi plantation" of single species forest (blackbutt) of similar age. These "plantations" have poor food and habitat resources for a diverse ecosystem

[Submission #2393]

Logging regime is too often and too hard leaving too little timber and not allowing the middle and lower storey to recover. Clear felled coups should only be thinned at 20 years and not clear felled again for at least 60 years.

[Submission #2436]

- » Prescribed minimum areas of protected habitat do not take into consideration the needs of forest ecosystems at local or regional levels.
- » Needs improved scientific method and impact assessment, at local and regional scales in a way that maintains and improves state biodiversity values over future decades with consideration to the effects of climate change.

Other environmental stakeholders acknowledged some positive elements to the plan but felt that it remained unacceptable in the context of Australia's declining biodiversity.

Forestry industry stakeholders were generally more positive and felt the draft IFOA provided greater clarity and management direction despite remaining doubts about the level of commitment to maintaining harvesting provisions. Conversely some forestry submissions raised that the reduction in yield from increased regulation would not support industry sustainability.

More general issues raised by stakeholders were:

- » insufficient public consultation on the draft IFOA.

4.3 Free-form submissions

The following analysis is provided on comments received additional to the guided questions. These comments ranged from general feedback on the sustainability of forestry operations in public native forests to specific feedback on the draft IFOA. Each of the unique submissions has been coded based on the coding framework included in Appendix A. All coding was collated according to the following sector interests:

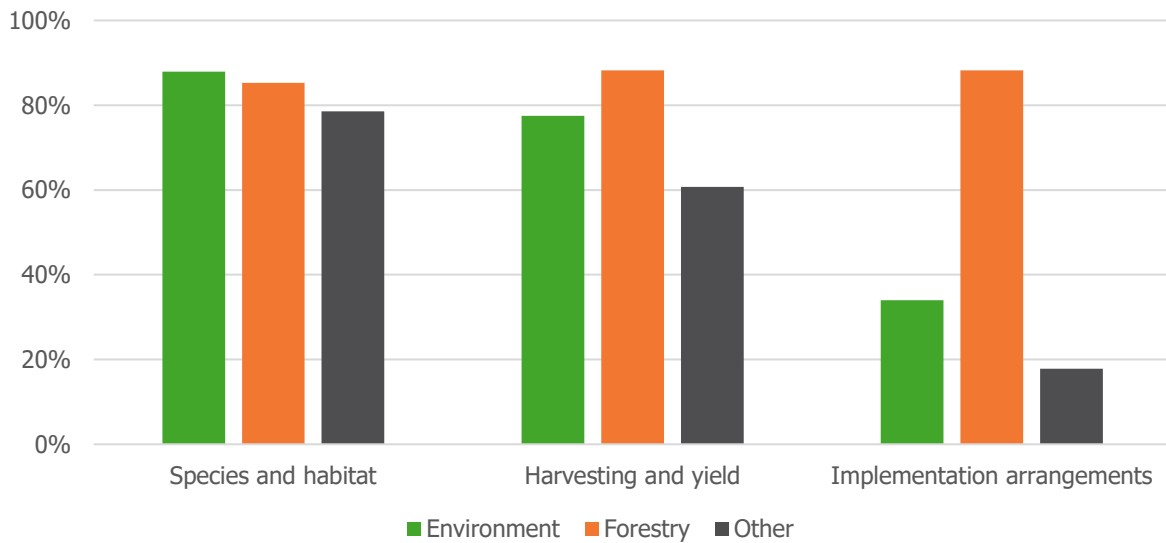
1. Environmental stakeholders (groups and individuals)
2. Forestry industry stakeholders (groups and individuals)
3. Other stakeholders (refers to: individuals and groups that identified themselves as aligned with apiarists, forest recreational users, Aboriginal interests and local government)

The majority of comments were analysed in consideration of the three major themes of the draft IFOA as listed below:

- » Species and habitat (i.e. ecological issues)
- » Harvesting and yield (forestry operations)
- » Implementation arrangements (governance)

As may be anticipated, environmental stakeholders were most concerned about species and habitat protections, while industry stakeholders were the group most likely to comment on implementation arrangements (see Figure 3).

Figure 3 Interest group key themes



Further detail on specific issues as raised by stakeholders is outlined below. These have been broken down by major themes of the IFOA and the specific interest of the stakeholder.

Environmental stakeholders

As with the campaign responses, the majority of unique responses came from environmental stakeholders (356) who were highly critical of forestry operations on public lands. They strongly indicated a desire for a broader consideration of forestry values, including Aboriginal culture and heritage.



*The impact of the IFOA proposals will dramatically undermine this potential new market *eco tourism*, which depends largely for its success on the social media network of referrals between existing participants.*

[Submission #2679]

Specifically, there is concern that timber harvesting conducted under the Draft IFOA may:

- » *fragment, isolate or substantially damage habitat important for the conservation of biological diversity in the World Heritage Area itself;*
- » *reduce or modify habitat for plant or animal species in forests adjacent to the World Heritage Area (p.16, Matters of National Environmental Significance: Significant Impact Guidelines 1.1, 2013 – attachment to this submission), and,*
- » *dramatically affect the inherent intrinsic Aboriginal culture and heritage values present within the landscape. Impacts will affect both the tangible and intangible components of Aboriginal culture and heritage and this must be recognised by Government when developing policy directives regarding land management.*

[Submission #2651]

Shown in Figure 4, the three priority issues raised by environmental stakeholders in relation to the draft IFOA related to:

1. Managing public forests for a range of values including ecotourism, biodiversity, carbon capture and Aboriginal culture and heritage.

2. Due to the commitment to maintaining harvesting regimes and intensity it does not represent ESFM.
3. To undertake a broadscale review of the forestry industry in public native forests prior to finalising legislation.

Figure 4 Environmental stakeholder submissions – overall issue



Environmental stakeholders were concerned about a range of issues in relation to species and habitat protection (see Figure 5) but were most focused on protection of arboreal habitat for threatened and sensitive species such as koalas, greater gliders and owls, including both food and nesting sources.



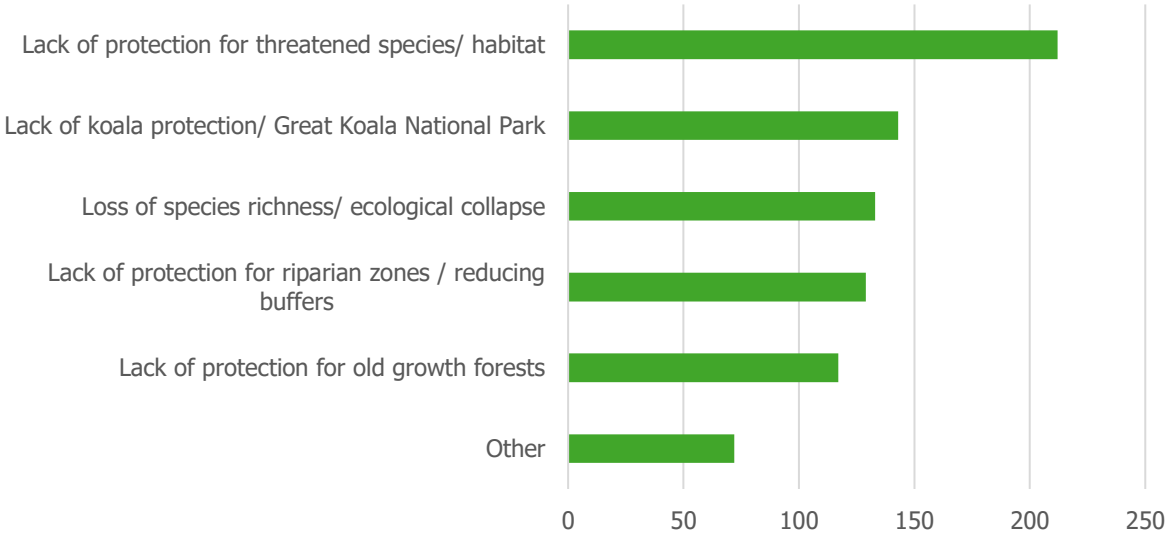
...because some preferred browse species are also favoured timber species (e.g. Tallowood), their removal reduces the potential food resource for the koalas and they will use secondary browse trees, some of which are not recognised in the koala browse tree list. Koalas will use other tree species at various times, particularly after rain when new growth makes them temporarily palatable.

[Submission #2463]

When it comes to habitat protection, it is the older trees (>120 years old) which start to have the hollows necessary for nesting and shelter, and even older trees (>200 years old) before there are large enough hollows for owls, larger birds such as cockatoos and gliders.

[Submission #2660]

Figure 5 Environmental stakeholders – species and habitat breakdown



Other issues identified by environmental stakeholders included:

- » Lack of protection for hollow-bearing trees.
- » Lack of protection for giant trees.
- » Balance with economic sustainability.

In commenting on harvesting and yield issues, environmental stakeholders indicated that they felt the IFOA was placing forest industry requirements above the ecological health of public forests (see Figure 5). There was general scepticism in respect to how controls and protocols had been developed, with recommendations that a stronger evidence base be developed prior to finalising the draft IFOA.

There was also a strong sentiment expressed by environmental stakeholders of the importance of getting the harvesting controls right, not just for the present community but also for future generations. Rather than improving the ecological health of public forests, a number of environmental stakeholders expressed the view that the draft IFOA harvesting and yield provisions would exacerbate ecological impacts and further threaten biodiversity.



The IFOA remake opens up to the industry trees with a DBH of up to 140 cm. This is a major shift in forest policy which will have a significant impact on the environment for decades if not centuries.

[Submission #2501]

Wildlife Habitat Clumps must cover 75 ha (5% of 1500 ha) in each Local Landscape Area and each clump has only to be greater than 1 ha in area. This could, for example, mean 25 3-hectare clumps over the 1500 ha. Indeed, Protocol 22 provides for Wildlife Habitat Clumps being "habitat islands within a large cutover area". Such clumps would be essentially useless for many species and referring to them as wildlife habitat is misleading and not supported by evidence.

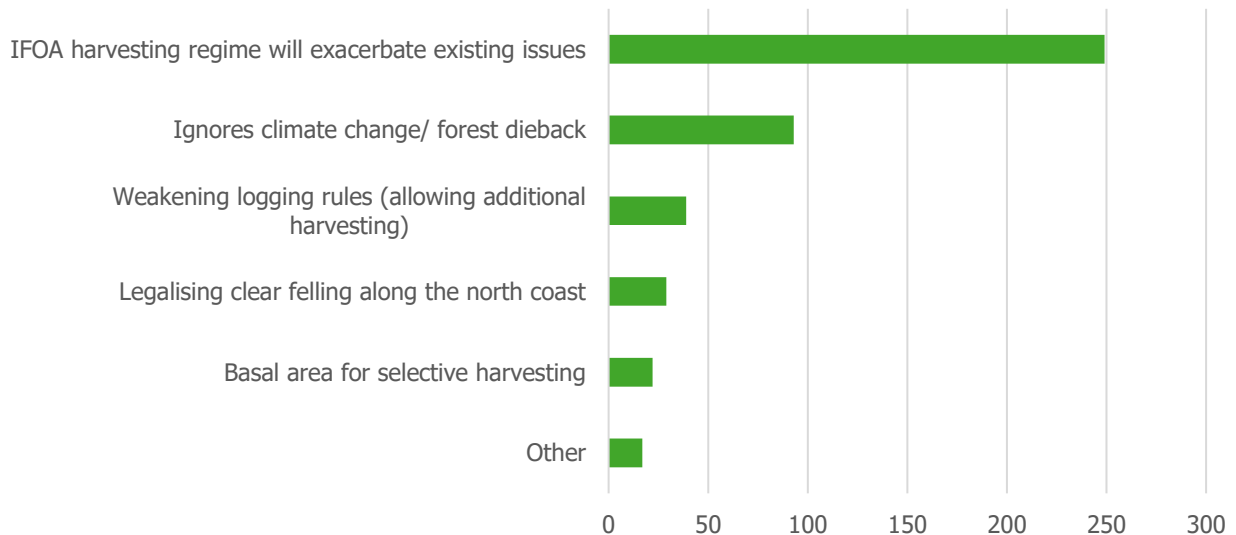
[Submission #2676]

Other issues raised in relation to harvesting and yield were:

- » The importance of maintaining timber diversity.
- » Inconsistency with meeting the commitment to protection of ecological values while also committing to no net wood loss/decrease of harvesting yield.

- » Lack of support for the proposal to introduce mixed intensity harvesting (with the concern that this would simply increase harvesting intensity).

Figure 6 Environmental interest submissions – harvesting and yield breakdown



Environmental stakeholders were least likely to raise implementation arrangements in their submissions. Two key concerns however were relatively consistent across their submissions. These were:

- » Historic lack of monitoring and enforcement of regulations and minimal confidence that the draft IFOA would rectify this.
- » Significant concerns that the proposed remapping and rezoning of old growth forests and rainforests would classify sensitive ecological communities as being harvestable.



In the Northern Rivers, such rezoning would likely result in large areas of BMAD-affected forest being logged because they supposedly no longer have any 'conservation value'. The current protocol of removing all trees affected by BMAD is to continue. These forests could be regenerated and saved, rather than be mortally wounded by logging.

[Submission #1600]

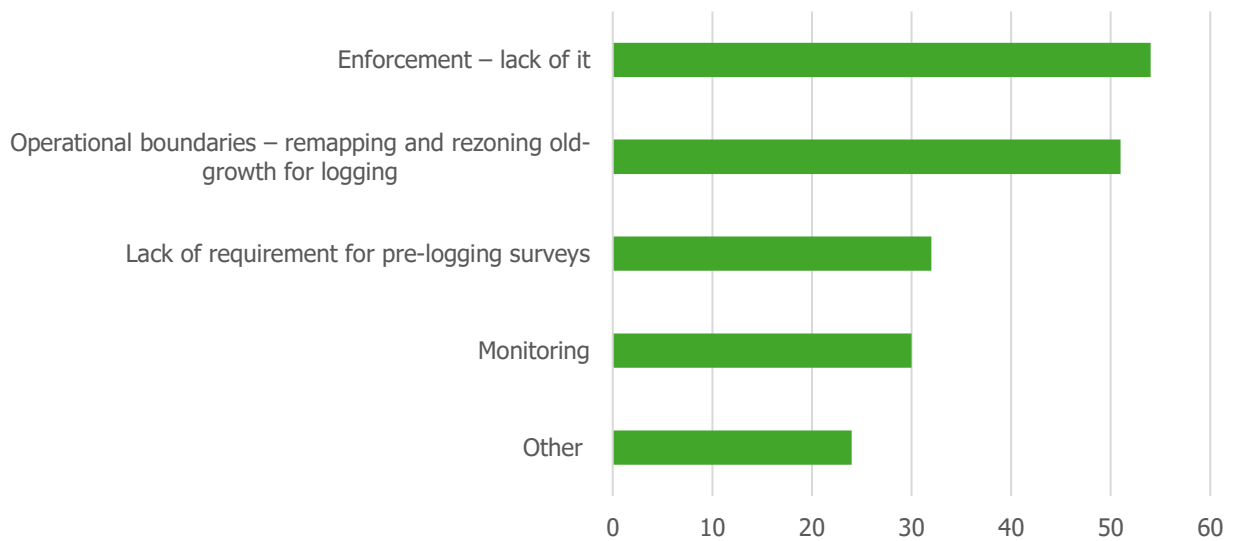
The new regime is supposedly to be accompanied by a monitoring program (despite lower costs being a driver of the changes), but there is no baseline upon which to ascertain trends because Forestry Corporation has not undertaken monitoring in the past. If the protections don't work, and indications are they won't – we will be monitoring species into extinction. The current regime was meant to be based on monitoring and adaptive management that was never done, so there is no assurance that it will be implemented this time either.

[Submission #2341]

The draft IFOA proposes to consolidate the currently separate licenses related to harming animals, plants, and fish or for polluting waters, replacing them with a single environmental licence will to be issued to loggers. I am concerned that this will reduce the specific protections required for different ecosystems and species and result in less protections overall.

[Submission #2461]

Figure 7 Environment interest submission – implementation breakdown



Other governance issues expressed by environmental stakeholders included:

- » Concerns about lack of third party appeals.
- » Lack of social licence.
- » Economic viability of increased regulation.
- » Need for adaptive management.

Forestry industry stakeholders

Of the unique submissions, 34 represented industry interests. These submissions mirrored the comments raised in the briefing sessions about the importance of a sustainable forestry industry to regional economies and concerns that the NSW Government would not equitably balance environmental values in relation to industry needs. Of key concern to the industry is that the draft IFOA does not represent a sufficiently flexible framework to balance the range of perspectives, interests and values related to management of public native forests.



The extreme regulatory controls being proposed by the EPA will not deliver positive ecological outcomes envisaged because of the lack of acknowledgment that forestry science has equal weighting with environmental science.

[Submission #2452]

The draft Coastal Integrated Forest Operations Approvals (IFOA), continues to provide a tape measure driven regulatory approach to environmental conservation in areas available for timber harvesting. Under permanent protection a few common species proliferate at the expense of most others and in the absence of regular mild patch burning, three-dimensionally continuous fuels, that promote devastating megafires, predominate at a landscape scale.

[Submission #2593]

A number of submissions however, also supported the draft IFOA's regulatory clarity, noting that it is a clearer document to both read and to adhere to:

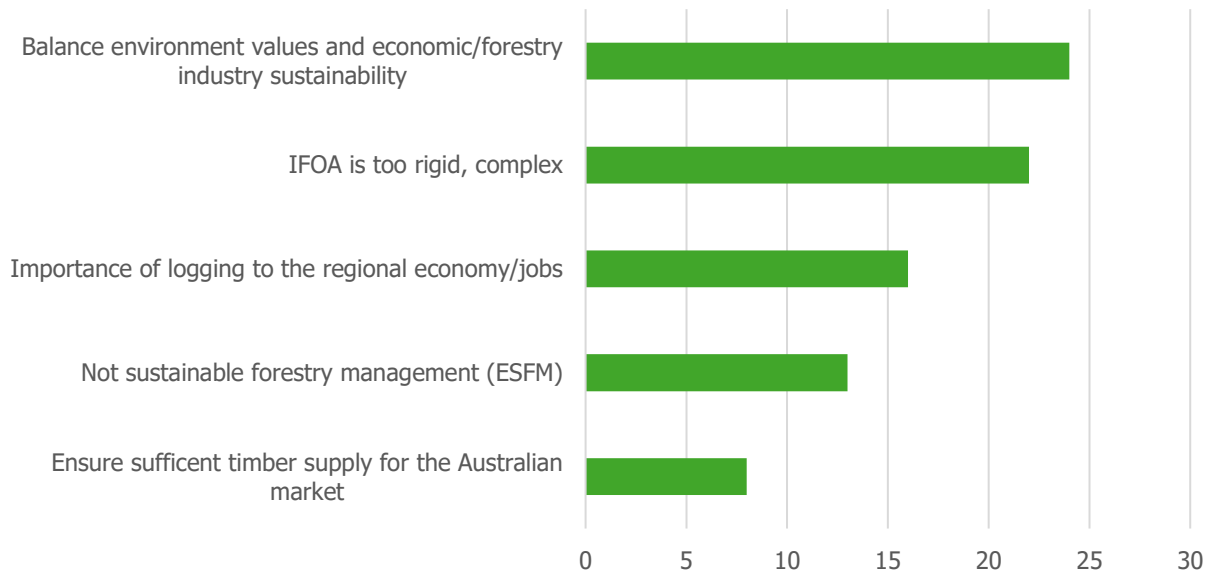


The consultation draft is much easier to read and interpret than the existing IFOAs. The new layout is also an improvement allowing detailed information to be more easily found. Splitting the instrument into Conditions and Protocols is supported as it

will enable prescriptive details to be more easily updated.
[Submission #2394]

Figure 8 provides an overview of the common general themes that emerged from forestry industry submissions.

Figure 8 Forestry stakeholders – overall issues



Other issues raised include:

- » Need to review native forest timber industry.
- » Public forests should be managed for a range of values not just environment.
- » Abandon the IFOA altogether.
- » A specific issue that emerged from the consultation with the forestry industry was to support use of heritage timbers such as Turpentine, used for wharf building along the east coast such as in Sydney Harbour. It is highly valued as a marine timber.



I know for a fact that the changes to the stream protection will impact Turpentine pile availability most particularly the longest piles as this is were they love to grow. In fact two years ago 3 piles were needed at Lunar park 22 metres long (a fairly exceptional length) we supplied these 2 of which came from unmapped drainage lines that under the new IFOA we would not be able to get. And you know what ? We did no harm getting these piles and nearby to them were other magnificent young turpentines reaching up to the sky for light which would make great long piles in another 50 years
[Submission #1994]

When commenting on species and habitat issues, the majority of industry stakeholders raised that environmental protections should be balanced with industry sustainability, referencing the commitment to no net wood loss.

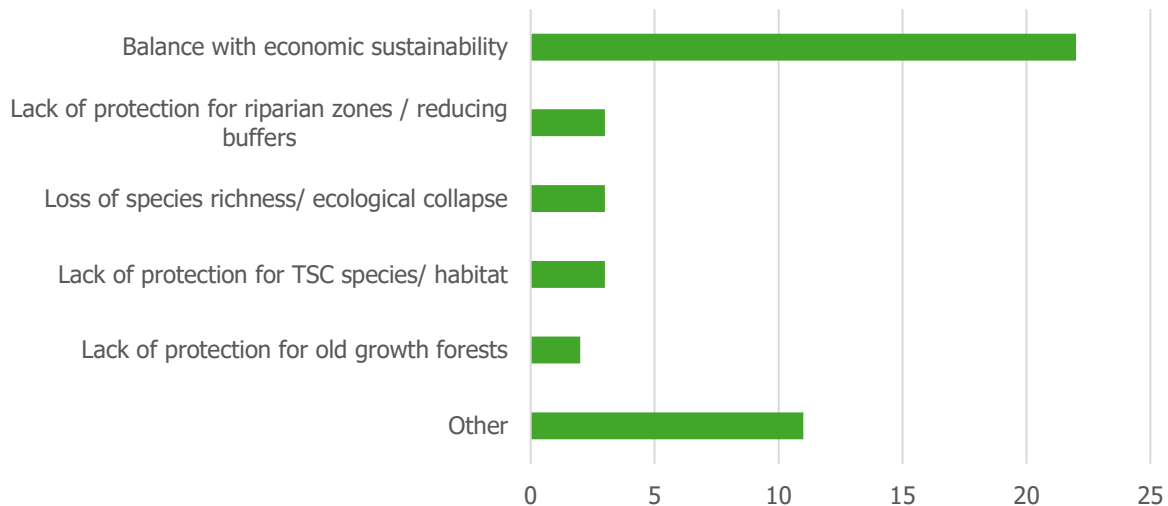


In the draft the number of species specific conditions for fauna has grown. These conditions are unduly prescriptive and complex. Most of the conditions provide additional protection to species that are listed as threatened. The conservation status of threatened fauna species can be expected to change in the future.
[Submission #2452]

The IFOA draft's focus on the identification and recording of trees for 'permanent retention' is of concern to the industry. Forests are dynamic ecosystems which are constantly changing.

[Submission #2591]

Figure 9 Industry stakeholders – species and habitat breakdown



Industry stakeholders regularly commented on the commitment to maintain wood supply, with most having the opinion that the draft IFOA does not provide the framework to support this commitment.



The findings to date indicate that it was not possible to achieve the twin commitments, with the emphasis shown that the environmental values could be met but wood supply was impacted. Knowing this outcome and the consequence that it would have on the Industry does raise concerns as to the overall effectiveness of the proposed conditions and protocols. Furthermore the fact that majority of the new proposals are yet to be tried and tested in an operational environment provides little confidence that a sustainable and viable wood supply can be maintained to the Industry.

[Submission #2579]

Other industry stakeholders noted that a number of the provisions for forestry operations in the draft IFOA would lead to improved forestry outcomes:



There are a few good points in the draft Coastal IFOA; - Two boundary types will make harvesting a lot simpler to work along. - Having Tree Clumps throughout the harvest area will make protecting habitat a lot easier. - New Basal Area limits will make good silviculture sense for future harvesting and ongoing timber supply

[Submission #2386]

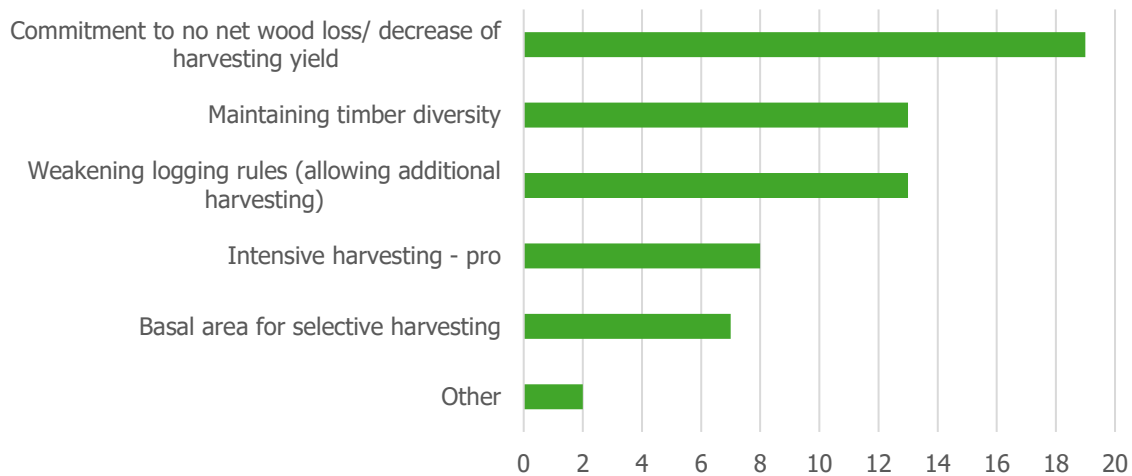
However some industry stakeholders did not share this view and felt the draft IFOA lacked alignment with forestry science:



The IFOA prescribes harvesting approaches based upon intensity of operations; however there is no attempt to relate the harvesting method to the silvicultural needs of the forest based on species composition.

[Submission #2586]

Figure 10 Industry stakeholders – harvesting and yield breakdown



Implementation measures were clearly a major issue for forestry industry stakeholders. Key issues included:

- » Lack of confidence in historic and proposed remapping of old growth forests.



The mapping of old growth forests on both public and private land and in northern and southern NSW has proven to be highly inaccurate. If old growth forest is of high conservation value, then it must be properly managed. If it is to be managed, land managers must know where it is in the local and regional landscape.

[Submission #2580]

- » Movement away from outcomes based to prescriptive forestry controls.



Managing debris around retained trees needs some other get out clauses where flattening or removal of debris will cause more disturbance and make a bigger impact than retention (e.g. steep areas, where growers or other retained trees need to be pushed out to do it, on the edge of exclusion zones where you would have to go into an exclusion zone to push them away).

[Submission #2386]

- » Support for new technology to support better decision-making and regulation.



We think that greater use of new research & technologies such as LIDAR, GIS mapping & habitat modelling will better inform appropriate regulation for our industry. One example would be greater accuracy & removal of uncertainty around accurately locating mapped & unmapped drainage lines with the current IFOA & paper based mapping systems.

[Submission #2577]

- » Restrictions to harvesting catchments based on protection of sensitive environments.



We applaud the introduction of Lidar technology to overcome the limitations of the Strahler stream ordering used under previous mapping technology. However we are concerned that the proposals:

a. are based on the premise that the most effective way to achieve soil and water protection is by limiting harvest area. Numerous studies have shown that soil disturbance within harvest areas leads to negligible erosion and turbidity when compared to roading and, in particular, direct connection between road structures and streams; and

b. fail to take any account of stream energy, rainfall erosivity and soil erodibility.
 [Submission #2580]

» Cost of enforcement on the forestry industry.



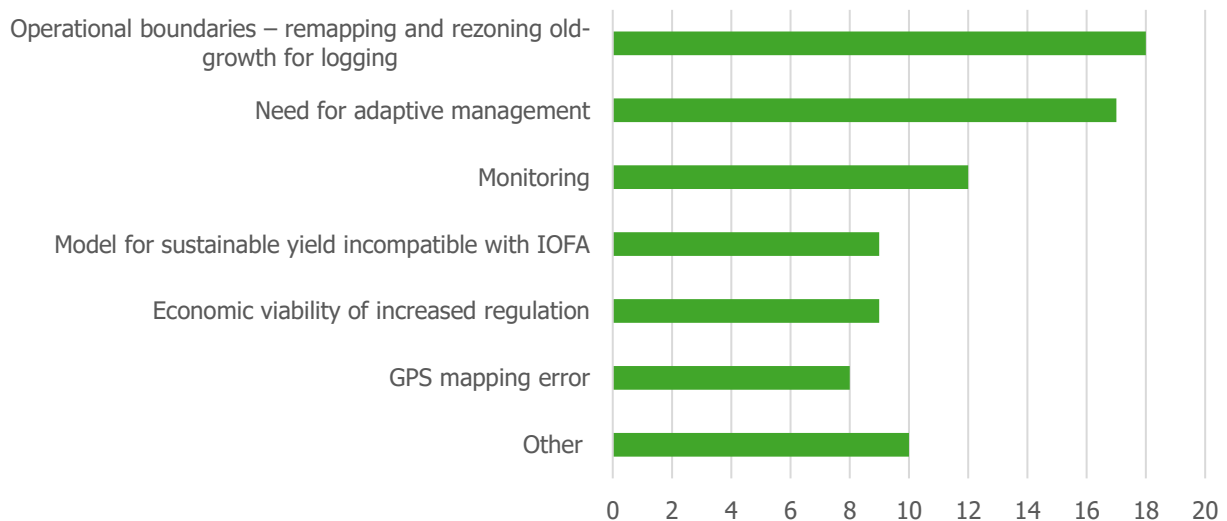
The size of the fines would not be an issue for the SETA membership, many of whom will be affected by this Bill, if they were confident that the regulating authority could deliver regulatory oversight in a fair and equitable manner
 [Submission #2593]

» Impact of the draft IFOA on industry contractors and devolvement of responsibility and liability:



The government's inability to consult with industry contractors and work with them to test the new conditions is disappointing and unprofessional. With no plans for pilot testing, the new approval leaves harvest contractors and wood processors to carry the commercial risk. The draft contains many new elements which will impose new obligations and costs on harvesting contractors.
 [Submission #2397]

Figure 11 Industry stakeholders – implementation breakdown



Other issues raised by forestry industry stakeholders were:

- » Level of enforcement and implications for the economic viability of the forestry industry.
- » Concerns about lack of third party appeals.

Other stakeholders

Outside of environmental and industry stakeholders, 28 unique stakeholders represented another interest. These included, Aboriginal interests, local government, apiarists, recreational users and farmers. Sentiment and feedback from these stakeholders was generally unsupportive of the draft IFOA, although about a third (11) provided neutral comment on the draft. None in this group registered support for the draft IFOA.



There is a deficiency in the draft Coastal IFOA in the absence or acknowledgement of apiarists as forest users and stakeholders. Hopefully this submission and that of other apiarist organisations, as part of public consultation, will facilitate a greater inclusion of the honey bee industry and the acknowledgment/recognition of beekeepers as legitimate forest stakeholders. Some comment as to the permanency of bee sites and

apiarist access would be valued by our industry.

[Submission #2578]

Under the proposed harvesting limits, the only mature trees will be those retained in clumps which will not be enough for commercial beekeeping purposes. Current harvesting practices do not always leave enough mature trees where some areas are being logged too heavily. Can you please consider increasing the minimum basal area retained including the more mature trees needed for sustainable beekeeping.

[Submission #1757]

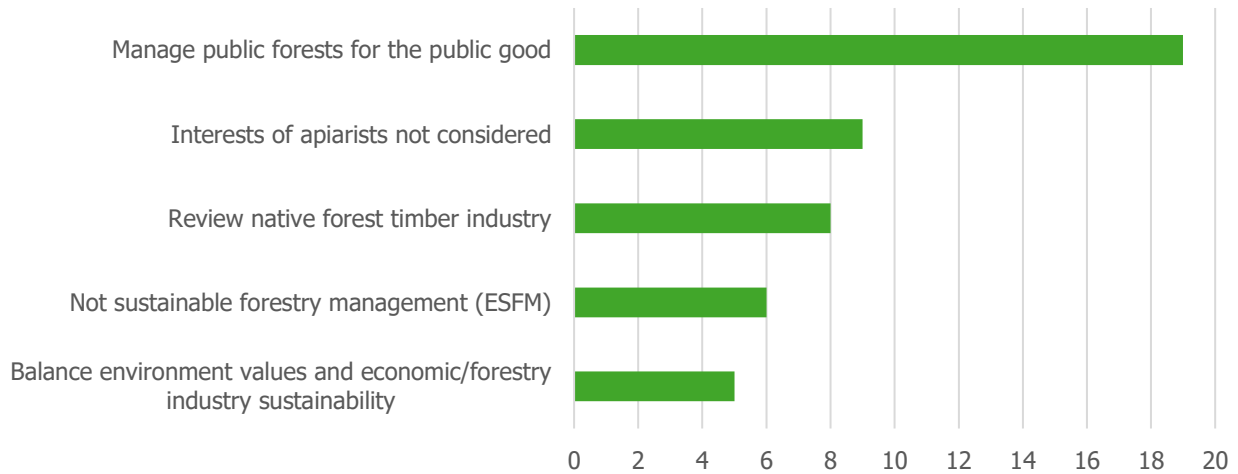
Of those that were highly critical of the draft IFOA, a majority favoured reducing forestry in public native forests and transitioning to plantation timber.



DEA recommends the cessation of all native forest logging and see an expansion in plantation forestry. At a minimum, DEA recommends a stop to all Old Growth and rainforest logging.

[Submission #2450]

Figure 12 Other stakeholders – overall issue



Other issues identified includes removing the IFOA altogether and commentary around the IFOA being too rigid and complex:

In terms of species and habitat, other key stakeholders focused on a number of issues such as:

- » Loss of protection for habitat 'recruitment', giant trees and sensitive ecological systems.
- » Protection of riparian zones and the inadequacy of 5-10m buffers on Class 1 streams particularly for threatened aquatic species (e.g. Fleay's Barred Frog)
- » Inadequacy of protections for koalas.
- » Lack of protection for mature flowering trees (specific to apiarists).



The "multi-scale landscape" approach to forest harvest planning, as proposed in the IFOA remake, is fatally flawed because it assumes that biodiversity values are homogenously distributed across the forested landscape. It is one of the basic principles of vertebrate ecology that populations of uncommon and rare species, and particularly threatened species (BC Act 2016) have heterogenous distributions and their conservation cannot be catered for by this so-called multi-scale landscape approach.

[Submission #1836]

Decreasing riparian buffers in these situations to 5 m either side of a stream course will effectively remove any protection for species dependent on healthy aquatic habitats. Where under the previous IFOA, buffer widths were increased if records of the threatened barred frogs or Golden-tipped Bat or Southern Myotis were known in the vicinity, these protections are completely abolished with the remake. No justification is provided for this change, despite the Forestry Corporation having undertaken research on these species over many years and acknowledging that buffers are beneficial for their conservation.

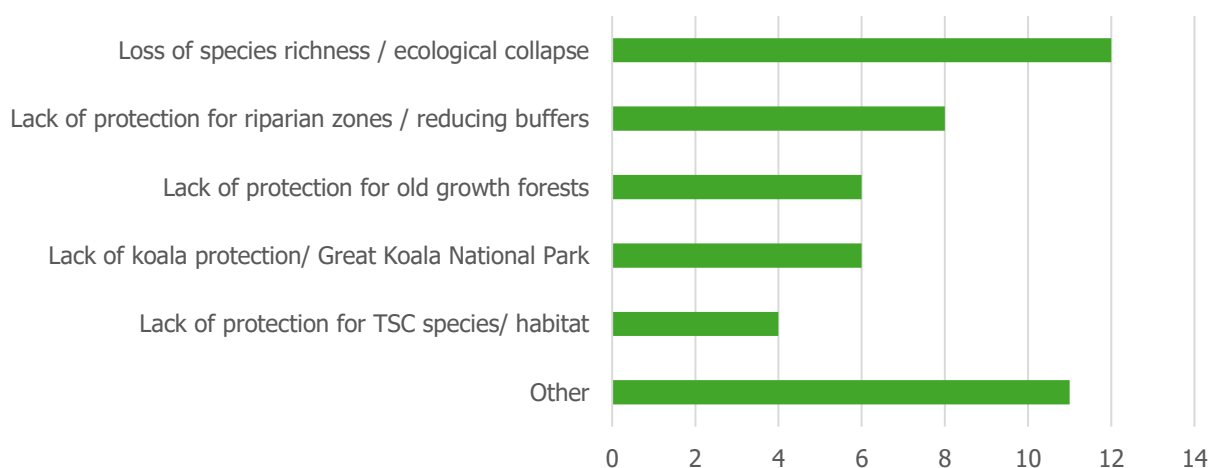
[Submission #1836]

Valuable and representative samples of forest and woodland ecosystems should be preserved free from logging and other exploitation as Flora Reserves in State Forests but ideally as Conservation Reserves.

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.

[Submission #1805]

Figure 13 Other stakeholders – species and habitat breakdown



Other aspects of species and habitat identified by other stakeholders included:

- » Balance with economic sustainability.
- » Lack of protection for giant trees.
- » Lack of protection for hollow-bearing trees
- » Removal of pre-logging surveys and species-specific habitat protection prescriptions.

In respect to harvesting and yield there was concern that the regime identified in the draft IFOA would exacerbate issues with ecological collapse rather than improve ecological values. Of particular concern was increased logging intensity.



In the non-regrowth zone, increased logging intensity combined with the failed silvicultural practice of attempting maximum disturbance for regeneration will result in an acceleration of the problems already characterising foothill and escarpment moist and wet forests.

[Submission #1836]

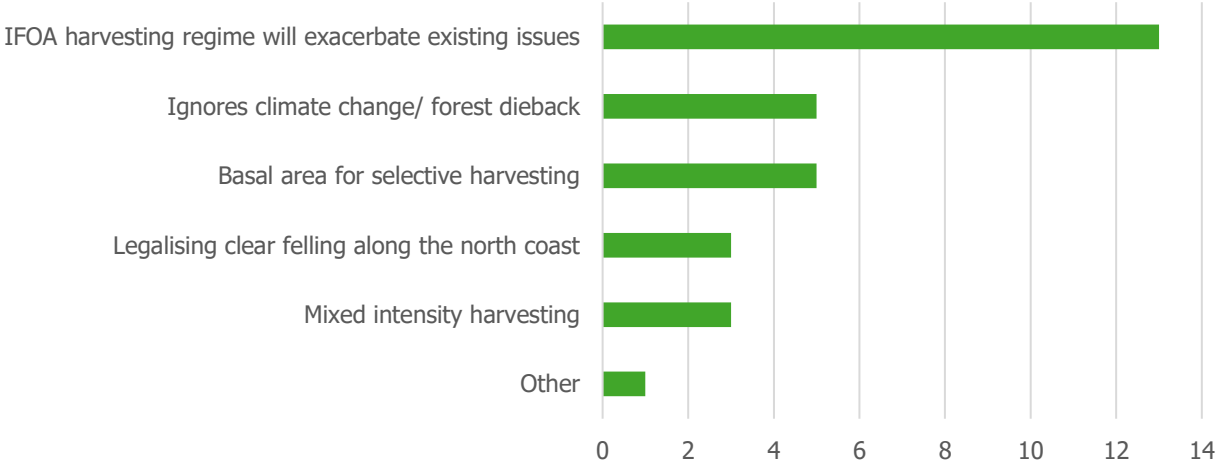
Apiarists were particularly concerned that the requirement for minimum retention of 10m² of basal area per hectare under the draft IFOA is inadequate to support diversity of mature flowering trees.



Logging regime is too often and too hard leaving too little timber and not allowing the middle and lower storey to recover. Clear felled coups should only be thinned at 20 years and not clear felled again for at least 60 years. Leaving too few trees does not allow for genetic diversity.
 [Submission # 2436]

Under the proposed harvesting limits, the only mature trees will be those retained in clumps which will not be enough for commercial beekeeping purposes. Current harvesting practices do not always leave enough mature trees where some areas are being logged too heavily.
 [Submission # 2410]

Figure 14 Other stakeholders – harvesting and yield breakdown



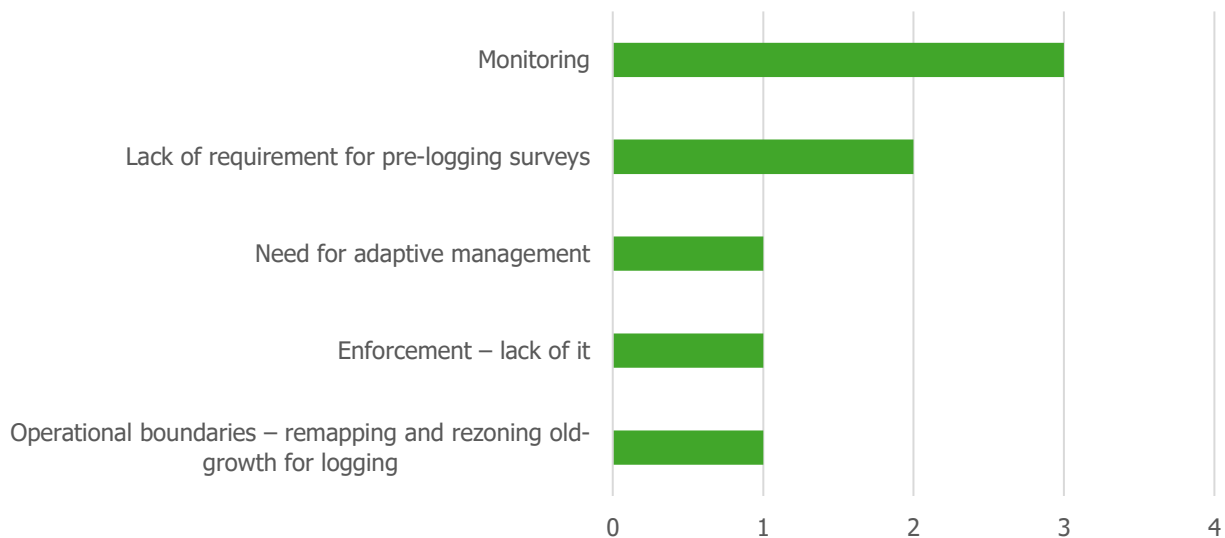
In respect to implementation and governance measures, the main concern for other stakeholders was the lack of a robust monitoring framework. Investment in research was seen as critical to supporting an evidence base for forestry operations and improving transparency with community stakeholders. A key issue identified for the draft IFOA is to balance a more prescriptive approach to the approvals with the flexibility of adaptive management.



If logging is to proceed, accurate data needs to be collated on each zone that is proposed for logging. It is clear that current data is inaccurate and inadequate. It would be negligent to pass laws based on the current knowledge and accuracy of information.

An increase in transparency so that there is a broader inclusion of community and industry groups in the decision making process. Specifically the annual reports that are specified in the "protocols", need to be made available every year. This is important so that the areas to be harvested and the environmental impacts can be accurately assessed.
 [Submission # 2450]

Figure 15 Other stakeholders – implementation breakdown



Further detail is presented below on the comments provided by two key (other) stakeholder sectors: Aboriginal stakeholders and local government.

Aboriginal stakeholders

There were two submissions by Aboriginal stakeholders. A detailed submission from the New South Wales Aboriginal Land Council (NSWALC) and an individual submission from the Woppaburra people (Queensland). The latter noted concerns about the impact of forestry operations on koala and bee populations.

NSWALC expressed concern about the risk of damage and destruction to Aboriginal cultural heritage as a consequence of the removal of provisions for the protection of Aboriginal cultural heritage from the Coastal IFOA. By implication this matter also relates to the ongoing reform of Aboriginal cultural heritage protection legislation in NSW and adequacy of current Aboriginal and cultural heritage provisions of the *National Parks and Wildlife Act 1974* (NSW).



NSWALC notes that the current Draft Coastal IFOA, unlike current IFOAs, makes no mention of Aboriginal values, rights or interests in forests, and contains no provisions for the protection of Aboriginal culture and heritage

Due to the consensus on the need for improvements NSWALC is unsure why the EPA doesn't consider the Draft Coastal IFOA an opportunity to strengthen protections for Aboriginal Cultural Heritage.

[Submission #2514]

NSWALC is also concerned that the NSW Government has determined to remove the requirements for best practice cultural heritage protection from the IFOA without adequate consultation with Aboriginal communities, or indeed peak statutory bodies.

The NSWALC perceives more general issues with the draft IFOA, particularly its attempt to reconcile the twin objectives of no net wood loss to the industry and environmental values.



Despite the stated aim of the remake of the Draft Coastal IFOA being balancing social, environmental and wood supply outcomes, the current Draft Coastal IFOA appears, on face value, to be designed to meet unsustainable timber volumes, at the expense of environmental and cultural values.

For example, NSWALC understands that the Draft Coastal IFOA proposes to change the way Environmentally Significant Areas (ESAs) are mapped and located on the ground. NSWALC opposes a one-way reassessment of stream exclusion zones, rainforest and old growth forest, and any reduction in the size of these exclusion zones. Intact rainforest and old growth forest represent remnants of ecosystems that were once more widespread across NSW, and are therefore important connections to NSW's pre-European landscape.

[Submission #2514]

The NSWALC concludes its submission with the following two recommendations for the draft IFOA:

1. The Government should reinstate provisions for the protection of Aboriginal culture and heritage in the Draft Coastal IFOA.

2. The Draft Coastal IFOA should include, at a minimum:

a. Provisions for Aboriginal cultural awareness training for FCNSW staff to ensure they have minimum competencies for the prevention of harm.

b. Clear guidance about legislative requirements pertaining to Aboriginal culture and heritage;

c. Best practice guidelines for the management and protection of Aboriginal culture and heritage, including provisions for genuine engagement with Aboriginal communities and organisations; and

d. Acknowledgement of the full suite of forest values that Aboriginal peoples hold in relation to forests.

[Submission #251]

Local government

There were two submissions from local government:

- » Bellingen Shire Council.
- » Kyogle Council.

Bellingen Shire Council

Council has serious concerns around the new IFOA, outlining the following key issues:

- » The impact on the waterways within the Bellingen Shire from a more intensive industrial logging regime on the steep erodible slopes located in areas of high rainfall.
- » The lack of communication, consultation and clarity/transparency from the State Government and FCNSW to Local Government. Particularly around past and current operations and changes to RFAs and forestry practices.
- » The lack of any science around the cumulative impact of logging operations on biodiversity, waterways and forest health.
- » The consistent breaches of forestry regulations by contractors and FCNSW staff as reported by other stakeholders and community.
- » The impacts of climate change and consideration of the vulnerability assessment process being undertaken by the NSW government.
- » Payment of rates by FCNSW on the basis that they are an enterprise competing in a commercial marketplace.

Kyogle Council

There was concern that the commercial considerations around FCNSW meeting quotas for the supply of timber were being prioritised over the protection of native forests and sustainable harvesting of timber. Council would not support any changes to timber harvesting that:

- » Effectively allows for the clear felling of native forests.
- » Allows harvesting small trees that should remain for future sustainable forestry operations.
- » Allows for clearing in closer proximity to Council waterways than is currently permitted.

5 Feedback from campaign submissions

Eleven different campaign submissions were originally identified in the analysis. However, on closer examination, a number of these, while stemming from different stakeholder types, had identical content. In total, there were seven distinct campaign submissions, three that stemmed from environmental stakeholders and four from industry stakeholders. The two campaign submission letters from industry stakeholders raised similar concerns, with version 2 (form letter [5] largely being an abridged version of form letter [4] and [6]). It is also worth noting that the two campaign submissions from forestry friends, family and employees (form letter [6] and [7]) had similar content.

The following provides a summary of the key points from each of the campaign submissions. The full text of the campaign submissions is provided in Appendix B.

5.1 Environmental campaign submissions

The three environmental campaign submissions tended to reflect high level concerns with utilising native public forests for timber production and lack of protection for ecological values rather than commenting directly on the elements of the IFOA.

[1] Environment – North Coast Region

This submission strongly focused on the impact of forestry operations on the environment, threatened species and ecosystems. It's major criticism of the IFOA is that it weakens existing logging rules. All of the other points in the submission relate to a general conviction that the government should cease native forest logging on public lands. The focus on koalas and protection northern coastal forests leads to the assumption that the campaign stems from NSW northern region based environmental interests.

There are ten dot points in the submission which are summarised below (none relate directly to the IFOA):

1. Failure of the RFA to protect the environment and industry security.
2. Recognise the regional benefits of non-timber forest values.
3. Establish the Great Koala National Park.
4. Transition out of logging, and protect native forests on public land following RFA expiration.
5. Manage public forests for the public good.
6. Don't log areas protected as threatened species/koala habitat, old growth forests rainforest and stream buffers.
7. Don't increase logging intensity or legalise clear-felling of NSW North Coast forests.
8. Don't put traditional forestry industry rights above those of the environment and sustainable forest based jobs.
9. Transition timber industry from public native forests to 100% plantations.
10. Transfer all subsidies from native forest logging to forest restoration.

[2] Environment – North Coast Region version 2

The headline for the campaign submission is '**do not implement the new Integrated Forestry Operations Approval**'. It shares similar concerns with the previous campaign letter [1] including clear felling of northern coastal forests (specifically between Grafton and Taree) as well as calling for the implementation of the National Park Association's (NPA) Great Koala National Park. Specific reference to the support by people within the Ballina and Lismore local government area for retention of forests for the public good (tourism, carbon storage and protection of water catchments) through the 'Forests For All' proposal reinforce that this campaign is based in the NSW northern region.

This submission more explicitly addresses other issues it has with the draft Coastal IFOA. It states that the new IFOA abandons the concept of sustainable forest management (ESFM) and has destroyed the social licence of the logging industry by:

- » Supporting clearfelling of coastal forests.
- » Remapping and rezoning old growth for logging.
- » Reducing headwater stream buffers.
- » Permitting logging of giant trees.
- » Doubling the intensity of logging in the 'selective harvesting zone'.
- » Increasing the impacts on threatened species and exacerbating key threatening processes.
- » Destroying high-quality koala habitat.

It notes that the IFOA ignores the reality of an existing threatened species crisis and a native forestry industry already in decline. It further comments that climate change and forest dieback will add further uncertainty to the industry.



Destroying what is left of the ecological values of state forests and logging protected areas to meet wood supply is not the action of a responsible Government.

The submission requests that the Government undertake a review of the logging industry, as recommended in the Ewan Waller report, abandon the IFOA and use the end of the RFAs to transition out of native forest logging on public land.

[3] Environment – South Coast Region

This submission is strongly based on the environmental interests of the southern region. It does not specifically address the IFOA but rather focuses on the care and management of NSW spotted gum forests in particular the forest adjoining Corunna Lake. The campaign submission is based on promoting the concerns and management proposal of the Great Southern Forest group.

The key considerations are:

- » To extend the current consultation period.
- » To use the RFA process to review current forestry arrangements to better protect soil, water, biodiversity, wildlife habitat and canopy.
- » To immediately halt all logging activities and undertake an investigation into legislative breaches of the Forestry Commission.
- » To prepare a management plan (based on the Great Southern Forest group proposal) that considers climate, jobs, water, carbon and wildlife and ensures that native forests are protected for future generations.

5.2 Forestry industry campaign submissions

The four (4) industry campaign submissions followed a similar line. While not being highly critical of the IFOA, they emphasise the need to balance environmental protections with sustaining the local forestry industry.

[4] Forestry business

This campaign submission has been prepared by businesses in the forestry industry. It states support for continuing forestry operations in state as well as private forests to maintain jobs (22,000 in NSW) and to provide timber to the Australian market as part of a long-term sustainable industry. It notes the importance of the forestry industry to some country NSW towns and the tight margins that it is currently operating under. While there is support for 'robust environmental guidelines for the forestry industry' there is also concern that enforcement of restrictive rules will impose too high a financial burden on the industry.

There is also criticism that the document does not support active and adaptive forestry management and will not lead to good environmental or commercial outcomes.

The key issue for the industry is the NSW Government promised:



... that the IFOA would be reviewed with two factors in mind – a balance between the commitment of no deterioration in environmental values and no net wood loss for industry.

[5] Forestry business version 2

The second campaign letter supplied by businesses in the forestry industry draws on the same points and concerns as stated in form letter [4]. It is abridged, but also more directly critical of the IFOA as having 'complex prescriptions and regulation' that contracts the area available for harvesting. It notes that the remake of the IFOA has considerable failings.

The letter reiterates the importance of sustainable harvesting in state forests for employment (22,000 in NSW) and to maintain 'the social and economic fabric of rural and regional towns'.

[6] Forestry employee, friend and family

This campaign letter was used by forestry industry employees, and by employee families and friends. Much of the content is reflected in form letters [4] and [5]. Again, the key message is that 'too many rules' will jeopardise the economic viability of the industry and associated communities.

Other repeated points are the promise that the industry 'not be subject to any wood loss from the new rules;' and that forest industries are important for employment (22,000 people in NSW) and the 'supply of sustainable hardwood timber to the Australian market'.

[7] Forestry employee, friend and family + online form

This letter reiterates the content of the previous industry campaign letters, with the focus on:

- » The importance of the forestry industry to regional towns.
- » The need to harvest from state as well as private forests.
- » Concern that the new rules will lead to greater costs on the industry.
- » NSW government promise of no net wood loss from the new rules.
- » Forest industries are important for employment (22,000 people in NSW).

» Supplies sustainable hardwood timber to the Australian market.

In addition, as an online response it also addressed each of the five questions in the submission proforma. Using it as an opportunity to either reiterate or raise the following points:

- » Of greatest importance is support for continuing approval to harvest state forests to support employment in forest industries.
- » The new IFOA has an easier set of rules to read and understand.
- » Concerned about the increasing amount of EPA nominated sensitive areas which restricts harvesting yields and threatens job security in the industry.

As a final point, the IFOA was noted as being 'slightly better than the previous IFOA'.

Appendices

- A Coding framework
- B Campaign submission examples
- C Submissions received

A Coding framework

Question	Codes (to be entered into Excel spreadsheet)	Coding
Submission #	<i>Unique submission number to be entered</i>	#
Profile data		
Type of submission / mode <i>Enter 1 only</i>	Submission received by email Survey response lodged online Mail Other	[1] [2] [3] [4]
Type of submitter / respondent <i>Enter 1 only</i>	Not identified Community group Local government Aboriginal group Industry group – forestry and allied services/ apiarists Environment group Other government Forest user group – recreational Individual Staff Other	[0] [1] [2] [3] [4] [5] [6] [7] [8] [9] [10]
Sector / interest area <i>Enter 1 only</i>	Environment Forestry Apiarist Recreational (4wd/hunting etc.) Government Scientist (academic) Other	[1] [2] [3] [4] [5] [6] [7]
Post code of submitter <i>Enter 1 only</i>	Post code	#
Location <i>Enter 1 only</i>	North – above Newcastle Central (metro) – Newcastle to Wollongong South – Below Wollongong Other – i.e. west of the dividing range Other Australian State/Territory Outside Australia	[1] [2] [3] [4] [5] [6]
Form letter	No Yes	[0] [1]

Question	Codes (to be entered into Excel spreadsheet)	Coding
Form #	These have been numbered 1 to 10 by the EPA	#
Content data		
Overall sentiment	Generally supportive of IFOA Generally not supportive of IFOA Neutral response / comment	[1] [2] [3]
Key quote	<i>If pertinent note quote that sums up sentiment of submission – only if varied from form response</i>	""
Overall issue <i>Enter up to 4 responses</i>	Scrap the IFOA Essential that the IFOA balances environment values and economic/forestry industry sustainability Importance of logging to the regional economy/jobs Not sustainable forestry management/ESFM Transition out of native forest logging to 100% plantations Transfer funds from logging to forest restoration Manage public forests for the public good (tourism, environmental repair, carbon sequestration, wildlife habitat, water resources)/ Forests for All IFOA too rigid, complex Ensure wood supply agreements provides sufficient timber supply for the Australian market Need to review the native forest timber industry – environmental, socio-economic and community impacts Lack of consultation and consideration of needs/values – apiarists	[1] [2] [3] [4] [5] [6] [7] [8] [9] [10] [11]
Key quote	<i>If pertinent note quote that sums up overall issue - – only if varied from form response</i>	""
Directed questions		/
Q1. Most important parts of the draft Coastal IFOA	Did not answer Nothing Species and habitat issues Harvesting and yield issues Implementation arrangements Other	[0] [1] [2] [3] [4] [5]
Comments	<i>Note any specific issues addressed.</i>	
Q2.What parts will have a positive outcome on environmental values or sustainable timber production?	Did not answer Nothing Management of environmental values Sustainable timber production Other	[0] [1] [2] [3] [4]

Question	Codes (to be entered into Excel spreadsheet)	Coding
Comments	<i>Note any specific issues addressed.</i>	
Q3. What parts will have a negative outcome on environmental values or sustainable timber production?	Did not answer Nothing Management of environmental values Sustainable timber production Other	[0] [1] [2] [3] [4]
Comments	<i>Note any specific issues addressed.</i>	
Q4. Views on the effectiveness of multi-scale protections?	Did not answer Nothing Management of environmental values Sustainable timber production Other	[0] [1] [2] [3] [4]
Comments	<i>Note any specific issues addressed.</i>	
Q5. Would it be effective at managing environmental values or sustainable timber industry	Did not answer Yes – re managing the environment Yes – re sustainable timber industry Yes - both No – re managing the environment No – re sustainable timber industry No - both Other	[0] [1] [2] [3] [4] [5] [6] [7]
Comments	<i>Note any specific issues addressed.</i>	
Thematic responses		
Theme 1: Species and habitat	No Mentioned: Yes	[0] [1]
Subject matter focus <i>Enter up to 4 responses</i>	Lack of protection for TSC species/ habitat/ threatening processes Lack of koala protection/ Great Koala National Park Lack of protection for old growth forests Lack of protection for giant trees Lack of protection for hollow-bearing trees Loss of species richness/ ecological collapse Riparian zones – lack of protection/ reducing buffers Balance with economic sustainability Other	[1] [2] [3] [4] [5] [6] [7] [8] [9]
Comments	<i>Note any issues if different from above</i>	
Theme 2: Harvesting and yield	No Mentioned: Yes	[0] [1]

Question	Codes (to be entered into Excel spreadsheet)	Coding
Subject matter focus <i>Enter up to 4 responses</i>	IFOA harvesting regime – will exacerbate existing issues – overlogging/ species habitat destruction etc. Intensive harvesting - pro Adjacency rules Basal area for selective harvesting Mixed intensity harvesting Ignores climate change/ forest dieback Weakening logging rules (allowing additional harvesting) Maintaining timber diversity Commitment to no net wood loss/ decrease of harvesting yield Protections of habitat/ tree (clumps) simplified boundaries improves logging practice efficiency Other	[1] [2] [3] [4] [5] [6] [7] [8] [9] [10] [11]
Comments	<i>Note any issues if different from above</i>	
Theme 3: Implementation arrangements	No Mentioned: Yes	[0] [1]
Subject matter focus <i>Enter up to 4 responses</i>	Monitoring Operational boundaries – remapping and rezoning old-growth for logging Enforcement – lack of it Economic viability of increased regulation Regulatory complexity lead to poor environmental outcomes Need for adaptive management Lack of social licence Lack of requirement for pre-logging surveys Concerns about lack of third party appeals Model for sustainable yield incompatible with IFOA GPS error and mapping Other	[1] [2] [3] [4] [5] [6] [7] [8] [9] [10] [11] [12]
Comments	<i>Note any issues/details if different from above</i>	
Other	Revise regional forest agreements Aboriginal heritage and cultural values Need to maintain recreational amenity	[1] [2] [3]
Quotes/ details	<i>Note any issues/details</i>	

B Campaign submission examples

B-1 [1] Environment – North Coast Region

The NSW government has recently announced its intention to drastically weaken the logging rules {Integrated Forestry Operations Approval - IFOA) to remove numerous protections for NSW's threatened species, koalas, old growth & rainforest and waterways. I call upon you to stop proceeding with these draconian changes and:

1. Recognise that the Regional Forest Agreements have failed to deliver environmental protection or industry security.
2. Recognise that the benefits of non-timber forest values are vital for the future of regional economies and ecosystems.
3. Establish the Great Koala National Park as an immediate priority.
4. 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.
5. Ensure that public forests are managed for the public good (ie: tourism, environmental repair, carbon sequestration and storage, wildlife habitat and provision of clean, abundant water)
6. Stop planning to log areas protected as habitat for threatened species, Koalas, old growth forest, rainforest and stream buffers.
7. Stop increasing logging intensity and legalising clearfell logging along the North Coast of NSW.
8. Stop propping up the rapacious native forest logging industry at the cost of species extinction, logging dieback, reduced stream flows and water quality decline and sustainable forest based jobs.
9. End the logging of public native forest and complete the transition of the timber industry to 100% plantations sourcing.
10. Transfer all existing subsidies from native forest logging into native forest restoration.

I will be closely monitoring your performance in these areas and taking further action if I do not see an immediate marked improvement in outcomes for our forests.

B-2 [2] Environment – North Coast Region version 2

I am writing to express my opposition to the Government's proposed changes to the Integrated Forestry Operations Approval (IFOA).

The new IFOA abandons any semblance of ecologically sustainable forest management (ESFM) by proposing the clearfelling of 140,000 hectares of coastal forests between Grafton and Taree;

'remapping and rezoning' old-growth for logging; reducing headwater stream buffers; permitting the logging of giant trees and approximately doubling the intensity of logging in the 'selective harvesting zone'.

By abandoning ESFM, the Government has destroyed the social license of the logging industry.

The new IFOA ignores reality. Widespread declines in wildlife has prompted the Australian Senate to call an inquiry into our threatened species crisis. Overlogging has reduced sawlog resources

throughout coastal NSW, a fact recognised by the industry itself. The number of jobs and mills has collapsed and logging now accounts for about 0.03% of primary industries employment. This will get worse as climate change and forest dieback make future timber resources increasingly uncertain-an issue highlighted in the Natural Resources Commission report but ignored in the IFOA.

The new IFOA will heighten the impacts of logging on threatened species, and exacerbate key threatening processes such as the loss of hollow-bearing trees and bell-miner associated dieback. The intensive harvesting zone will destroy almost half of the mapped high-quality koala habitat in state forests.

It is becoming increasingly clear that the best use of forests is to protect the wildlife that the tourism industry depends upon; protect the water supplies that our communities rely on and store the carbon that is driving climate breakdown. Polling in the electorates of Ballina and Lismore show that 90% of people agree. Yet the new IFOA directly undermines all of these imperatives, just to meet unrealistic wood supplies for a few short years.

Destroying what is left of the ecological values of state forests and logging protected areas to meet wood supply is not the action of a responsible Government. One of the recommendations in Ewan Waller's report into the RFA consultation was that the Government conduct a review of the logging industry considering climate change, conservation, socio-economic issues and support for the logging industry. This is the least the community can expect.

I urge you to abandon the IFOA, and instead use the end of the Regional Forest Agreements to transition out of native forest logging on public land and implement positive alternatives like NPA's Great Koala National Park and Forests For All proposals.

B-3 [3] Environment – South Coast Region

I am writing with deep concern about the care and management of the South East region of NSW spotted gum forests in particular the forest adjoining Corunna Lake. When I hear that logging is taking place in my local area I feel angry and confused as to how this is able to happen seemingly without adequate community consultation and clearly without regard for the ecological and environmental devastation that so often lies in the wake of these actions.

Forests are vital for climate stabilisation of the planet; existing mature plantations can meet Australia's timber needs; while the Regional Forest Agreement process provides a timely window of attention on native forests, its assumptions and outcomes are clearly outdated in the light of scientific evidence and the recognised importance of forests on climate and water cycles; - the present system of management of SE native forests for timber extraction has overseen large environmental, economic, social and employment losses with inestimable damage to soil, water, biodiversity, wildlife, habitat and canopy thus drying out the forests.

After hearing the directives of the Great Southern Forest group and their executive brief that is available via their-website

(www.greatsouthernforest.org.au) I invite you to look at their management proposal. They are offering a very comprehensive approach to native forest management with respect to climate, jobs, water, carbon and wildlife. I believe that we need to be considering the future generations in all our decisions with regard to managing our natural resources and the Great Southern Forest Group is offering a management plan that meets the needs of our future.

As a member of the south coast community, I want-the consultation period to be extended and more care to be taken in investigating what our local community wants in regard to logging our forests. I want all logging activities to be halted immediately and proper investigation into the thousands of legislative breaches Forestry Corporation has made. I want a serious rewriting of the outdated Regional Forest Agreements and for the management plan of Great Southern Forest Group to be

seriously considered in this revision. We need a forest management plan that is aligned with what the community wants so that we may enjoy the forests in the present time and respect the wellbeing of our future generations.

B-4 [4] Forestry business

My company is an important supplier of services to the timber industry (strike out if not applicable)

My company is an important secondary processing entity in the timber supply chain (strike out if not applicable)

The continuity of forestry operations is Important to me as my business depends on a sustainable long term forest-industry supplied both from state forests and private forests to the mills in NSW.

I support having robust environmental guidelines for the forestry industry but imposing too many highly restrictive rules leads to increased costs that threaten the economic viability of the industry.

This is a close supply chain and the businesses are reliant on each other to thrive. The margins are tight and the industry, particularly in regional areas are often the lifeblood of some country NSW towns.

The issue that I would like to highlight with the remake of the IFOA is the NSW Government promised that the IFOA would be reviewed with two factors in mind – a balance between the commitment of no deterioration in environmental values and no nett wood loss for industry.

I support this view and stress that it is important to retain the workforce in the forest industries which currently employ just over 22,000 people in to NSW and provides a valuable supply of timber to a variety of Australian businesses.

The draft is a narrowly conceived document which gives no consideration to the dynamic nature of the Australian bush and the need for active and adaptive management. It naively assumes that classifying forest as a reserve is enough to protect it. The draft lacks the flexibility and latitude which is needed to achieve good environmental and commercial outcomes.

It is vital that the NSW government understands that the forest industries are important to the NSW economy and any environmental legislation must balance environmental principles with the social-economic considerations. The state of NSW must not lock up every state forest by making it too hard to harvest.

B-5 [5] Forestry business version 2

I have a primary processing business/ forestry/ consultancy business/ harvest and haulage business in the forestry industry and wish to make a submission on the draft Coastal Integrated Forestry Operations Approval (IFOA).

The continuation of forestry operations is important to me as my business depends on a sustainable long term forest industry both from state forests and private forests. The IFOA while important for ensuring environmental values are retained, the continual encroachment with complex prescriptions and regulation is contracting the area available for Forestry Corporation NSW to harvest every year.

The points I wish to make concerning the remake of the IFOA are as follows:

While I recognise that the remake of the IFOA has considerable failings it is important that sustainable harvesting continue in state forests as it supports 22,000 people employed in the industry in NSW and is vital for the social and economic fabric of rural and regional towns.

B-6 [6] Forestry employee, friend and family

Forestry operations are important to me as my job depends/ my friends and family as our town depends/ on a sustainable long term forest industry both from state forests and private forests.

I support having good environmental guidelines for the forestry industry but making too many rules causes the industry to have greater costs imposed on it and that is then clearly a problem for the economic viability of the industry and our town.

The issue that I would like to highlight is that the NSW government promised that the industry would not be subject to any wood loss from the new rules. It is important that this promise is kept.

There are about 22,000 people employed in the forest industries in NSW and this is important to rural regions and for the supply of sustainable hardwood timber to the Australian market.

B-7 [7] Forestry employee, friend and family + online form

Make a submission – Form

1. What parts of the draft Coastal IFOA are most important to you? Why?

That the state forest can continue to be sustainably harvested as my family member's jobs and continuing employment depends on this.

2. 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?

It appears to be an easier set of rules to read and understand.

3. 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?

The continuing reduction of area able to be harvested because of increasing amount of sensitive areas decided by the EPA.

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

It might make it look more effective but it can be easily manipulated by the agencies to reduce areas available for harvesting. Decreased timber production threatens my family security because they have jobs in the forest industry.

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

Yes because it is slightly better than the previous IFOA.

General comments

I work in the/am a family member of someone employed/supporter of the forest industry and wish to make a submission on the draft Coastal Integrated Forestry Operations Approval (IFOA).

The continuation of forestry operations is important to me as my job/ as one living in a regional area that depends on the industry for employment and also the sustainability of our regional town centres. We need this long term forest industry both from state forests and private forests.

I support having good environmental guidelines for the forestry industry but making too many rules causes the industry to have greater costs imposed on it and that is then clearly a problem for the economic viability of the industry.

The issue that I would like to highlight with the remake of the IFOA is that the NSW government promised that the industry would not be subject to any wood loss from the new rules. It is important that this promise is kept. There are about 22,00 people employed in the forest industries in NSW and this is important to rural regions and for the supply of sustainable hardwood timber to the Australian market.

C Submissions received

Of 3,148 submissions received 432 submissions consented to publication. Only submissions consenting to publication have been listed.

Submission number	Submitter	Submission number	Submitter	Submission number	Submitter
1532	Deb Richardson	1721	Meg Nielsen	1865	Lyndal Breen
1578	Kenneth Wojcicki	1733	Kit Kelen	1867	Andi Mellis
1579	Kenneth Wojcicki	1734	Tachel Gregg	1869	Ross McKinney
1580	Kenneth Wojcicki	1737	Anthony Bischoff	1870	Caitlin McKinnon
1586	Peter Smith	1738	Chris Nixon	1871	Stephen Cartwright
1589	Susan Adams	1739	Ruth Nielsen	1872	Tom Whelan
1591	George Dionyssopoulos	1740	Leif Lemke	1884	Particle Lead Accelerator Pty Ltd
1592	Donald Macleod	1743	Tom Brennan	1885	Daniel Ellery
1593	Ian Dixon	1747	Heather Mesher	1889	Everlong Building
1594	Edward Caruana	1749	Theresa Mason	1890	R Fox
1595	Meg Nielsen	1752	Judy Parkin	1893	Elisabeth Mortiner
1597	Peter Nielsen	1753	Hugh Nicholson	1910	Adrian Cooke
1598	Sally Pyvis	1754	Lyn Walker	1912	Peter Morris
1599	Carol Sparks	1756	Christine Ray	1914	Bike Love Corral
1600	Wayne & Susan Somerville	1757	Sterling Kershaw & Co	1925	Caitlyn Brightmon
1601	Julie Ho	1759	Eugene Collins	1931	Galvanise Australia
1602	Pacific Contracting Pty Ltd	1760	Ian Dixon	1933	Terry Wall
1604	Faye Richardson	1761	Kirsten Cowley	1934	Nathan Tremain
1605	Wonboyn Lake Management Group	1769	Bangalow Koalas Inc.	1935	Tess Winter
1607	Clarence Environment Centre	1776	Sally Hook	1938	Grace Neff
1609	Danial Whitty	1779	Jane Dargaville	1939	Northern Tablelands Wildlife Carers
1610	Toys and Things	1803	Mark Palmer	1940	Steven Boniface
1611	Donna Layton	1804	Kevin Williams & JA Stewart	1941	Alisha Mercer
1613	National Parks Association of NSW, Tamworth-Namoi Branch	1805	National Trust	1943	Wilderness Society Illawarra
1614	Alison Cooper	1819	Sara Hinds	1946	Ross Murray
1615	Stephen Targett	1820	Judith Cooney	1949	Michael Field
1616	Susan Gould	1824	Nanette Nicholson	1953	Ian Baird
1664	Jamie Shaw	1825	Carolyn Heise	1959	Emma Henderson
1680	Sean O'Shannessy	1826	William Douglas	1962	Michelle Murch
1681	Mint Floors and Shutters	1827	Peter Quirk	1964	Leila Davis
1683	Sarah Bergmann	1831	Eurobodalla Greens	1966	Lachlan Reilly
1688	Simon Clough	1833	Brian Faithfull	1967	Sandra Shergill
1694	Hamish Cobbett	1834	Saskia Kouwenberg	1969	Angela Griffiths
1695	Keri James	1835	Menkit Prince	1970	Brian Pascoe
1696	Mick Daley	1836	Landmark Ecological Services	1971	Bunya Valley Landcare
1698	Blue Ridge Hardwoods	1837	Mary Forbes	1972	Joanna Jankaus
1700	Andy Hutchinson	1838	Alan Tarlinton	1973	Norman Jackson
1701	Anthony Bosch	1839	Mark Merritt	1974	Jacob Grossbard
1710	Peter Nielsen	1841	Damon Leach	1975	Richard Stanford
1715	Tim Greenish	1842	Jennifer Harkness	1979	Save Manly Dam Catchment Committee
		1844	Paul Tait	1981	Aashay Nandigam
		1850	Mark Paterson		Stephen & Linda Brazier
		1856	Autarky Farm	1982	
		1857	Irene Wickham	1984	Rob Rich
		1858	Jenny Rooke		

Submission number	Submitter
1985	Kuranda Conservation Community Nursery Inc
1987	Helen Nugent
1990	Susan Dwyer
1992	D Williamson
1993	Raymond Cansick
1994	Tawmar Timbers
1995	Brian Sawyer
1997	Grace Fon
1999	Paul McCann
2000	Rosemary Glaisher
2002	Ruth Rosenhek
2003	Kristine Hely
2254	Sally Manson
2277	Jane Serotzki
2281	Bangalow Koalas Inc.
2282	Linda Sparrow
2293	Teresa Heal
2322	Slippery Creek Pastoral Company
2323	FOWSP
2324	Suzanne Sherwood
2325	Marilyn Spencer
2327	Mitchell Forrest
2328	Weerona Apiaries
2329	Judith Wenborn
2330	Martin Watts
2332	Roger Corben
2333	Anne Buckingham
2334	Paula Bowler
2335	Juliette Norwood
2336	Lyn Brown
2337	Jenny Brown
2338	Lois Katz
2339	Neil Franks
2342	Andreas Dalman
2343	Laura Noble
2344	Irene Richardson
2345	Potaroo Palace
2347	Louise Taylor
2349	Drusilla Megget
2350	Roy Bishop
2351	Anna Usko
2353	Kay Muddiman
2354	Kris Schmah
2358	Daan Spijjer
2359	Les Mitchell
2360	Ruth Kenrick-Smith
2362	Siohan Paget
2364	Barry Lees
2366	Lynne Robertson
2367	Tracey Gleeson
2368	Robert England
2372	Nadine Chapman

Submission number	Submitter
2374	Kyogle Council
2375	Wendy Penney
2376	Ron McLachlan
2381	Vanessa Cain
2382	Brian Garrett
2383	Castlecrag Conservation Society
2384	Jason John
2385	Lane Cove Bushland & Conservation Society
2386	Coopers Logging Pty Ltd
2387	Norman Webb
2388	Alexander Wall
2389	Wires NR
2390	Ryde Hunters Hill Flora and Fauna Preservation Society
2392	David Barrett
2394	Mavic (Aust) Pty Ltd
2395	Newell's Creek Logging
2396	Cangai Timbers
2398	Tobias Davidson
2401	Wayne Martin
2402	Bellingen Shire Council
2403	Marlaina Sole
2405	National Parks Association Milton Electorate
2406	Joyful Anne
2409	Birding NSW
2411	Maria Bradley
2412	Lydia Bezeruk
2413	Alan Yuille
2414	Jason Connor
2415	Catherine Macleod
2419	Joe Sparks
2424	Brigid Dowsett
2426	Melanie Woodcock
2428	Jennifer Cuthbertson
2429	Rob Scott
2430	National Parks Association of NSW/Nature Conservation Council
2431	Bushwalkers NSW
2432	Environmentally Concerned Citizens of Orange
2433	NSW Apiarist Association - Southern Tablelands Branch
2434	Patricia McKelvey
2435	Winnie Fu
2436	Stephen Targett
2437	Green and Clean Awareness Team

Submission number	Submitter
2438	Birdlife Northern NSW
2439	Anne -Marie Briggs
2440	Anne Higginson
2441	Penelope Charles
2442	Desnee McCosker
2443	Mark Suttor
2444	EcoNetwork-Port Stephens
2445	Caitlin Hockey
2446	Jim Morrison
2447	Kristen Yong
2448	Blue Ridge Hardwoods
2449	Jillian Snell
2450	Doctors for the Environment
2451	Margaret Blakers
2452	John Mcgregor-Skinner
2453	Kevin Snell
2454	Valley Watch Inc
2456	William Braines
2457	Wendy White
2459	Doug Vance
2460	Shoalhaven Natural Resources & Floodplain Management Committee
2461	Adrienne Shilling
2462	Robert Bertram
2463	Vanessa Standing
2464	Don White
2465	Penelope Short
2472	Pat Schultz
2473	Anthony Johnson
2474	Rosie Too
2475	The Colong Foundation for Wilderness Ltd
2476	Brian Summers
2477	Miranda Mills
2478	Central West Environment Council
2479	Parramatta Climate Change Action Network
2480	New England Greens Armidale Tamworth
2481	Lismore Environment Centre
2482	The Colong Foundation for Wilderness Ltd
2483	Australian Forests and Climate Alliance
2484	Ian Hill
2485	Nancy Palin
2486	Claire Bettington
2487	Forestmedia Network Inc

Submission number	Submitter
2489	Coopers Creek Landcare Inc
2490	Gregory Hall
2491	The Coastwatchers Association Inc
2492	Cathy Eggert
2493	National Parks Association of NSW
2494	Susan Bendel
2496	Leon Hoffmann-Detenhoff
2497	Paula Flack
2498	Samuel Chambers
2499	The Peace of Bamboo
2502	Lauren Edwards
2505	Dorothy Robinson
2506	Ian McKenzie
2507	Judith Bourne
2508	Ellie Robertson
2509	Ima Hynson
2511	Gupreet Singh Gill
2512	Cloe Ellis
2516	Mark Wheatley
2517	Milena
2518	Tym McLaughlin
2519	Saskia
2520	Bronwyn Smith
2521	Josie
2522	Finn
2524	Robbie Cove
2525	Robin Burbidge
2526	Rob O'Brien
2527	Emma
2529	Katherine Lynzaat-Reid
2531	Mitchell
2532	Tamlyn Magee
2533	Jim Horvath
2534	Dave Wilmott
2535	Christy
2536	Susan
2537	Joel
2538	Suzanne Munro
2540	Eva
2541	Loki Blazki
2542	Dallis Tanner
2543	Erick Mitsak
2545	Jake Graham
2546	Catherine
2547	Marlo
2548	Sam Jeffries
2550	Lauren Mitsak
2552	David Mitsak
2553	Deborah Graham
2554	Lyndal Page
2555	Richard Ploog
2556	David Gallan

Submission number	Submitter
2557	Sue
2558	Keri James
2559	Nicholas Mitsak
2560	Caroline Long
2561	Kyle Wilson
2562	Brett Hawkins
2563	Jane & Ray Moxon
2564	Barbara Johnson
2565	Judy Swan
2566	Stephanie Birk
2567	Wendy Wolff
2568	Sue Veness
2569	Michael Mitsak
2570	Jade Veitch
2572	Leonard Ryan
2573	Zoe Burke
2574	Tinkabell
2577	Hurford Hardwood Australia Pty Ltd
2578	Capilano Honey Limited
2579	Boral Timber
2580	Institute of Foresters Australia
2581	Allied Natural Wood Exports (ANWE)
2582	Timber NSW
2583	Australian Forest Products Association
2584	McKinnells Pty Ltd
2587	Newell's Creek Sawmilling Co
2589	NSW Apiarists Association
2590	Wendy Wilton
2591	Jamax Forest Solutions
2592	Almond Board of Australia
2593	South East Timber Association
2594	North East Forest Alliance
2595	Environmental Defenders Office NSW
2596	South East Forest Alliance
2598	Susie Russell
2599	South East Region Conservation Alliance
2600	Lyn Orrego
2601	North Coast Environment Council Inc
2605	Stephen Gorrell
2608	Rosie White
2609	Rod McKelvey
2611	International Fund for Animal Welfare
2613	Seán Burke

Submission number	Submitter
2614	Ryde-Gladesville Climate Change Action Group
2618	Nambucca Valley Conservation Association
2621	Trinny Roe
2625	Ian Cohen
2626	Harry Creamer
2627	No Electricity from Forests
2628	Amanda Borthwick
2629	Nimbin Environment Centre
2630	Cathy Picone
2643	Georgette Allen
2647	Dianne Mackey
2648	Cath Eaglesham
2651	Community Advisory Committee for Gondwana Rainforests of Australia World Heritage Area
2656	Joy van Son
2657	Norm Webb
2660	Fiona McCormick
2661	David Smith
2666	Nigel Cotsell
2668	Bellingen Environment Centre
2671	Libby Baldwin
2673	Lorraine Vass
2676	Aila Keto
2677	Naomi Tarrant
2678	North Coast Environment Council Inc
2679	Barry Tomkinson
2680	Pamela Reeves
2681	Geoff Reid
2682	Alan Roberts
2685	Marg McLean
2688	Nature.Net
2690	Community Environment Network Central Coast
2699	Jennifer Gray
2715	Linda Gill
2742	Ally Grace
2779	Koppers Wood Products Pty Ltd
2782	Kevin Brotherson
2785	Koppers Wood Products Pty Ltd
2786	Koppers Wood Products Pty Ltd
2789	Koppers Wood Products Pty Ltd
2790	Bronwyn Hastings

Submission number	Submitter
2791	Graham Hastings
2792	G&D Lee
2795	Koppers Wood Products Pty Ltd
2796	Koppers Wood Products Pty Ltd
2797	Jacob Whitton
2798	Koppers Wood Products Pty Ltd
2799	Koppers Wood Products Pty Ltd
2800	Koppers Wood Products Pty Ltd
2801	Koppers Wood Products Pty Ltd

Submission number	Submitter
2803	Koppers Wood Products Pty Ltd
3062	Peter Cooper
3065	Catherine Pietruszka
3067	Angela Bennett
3070	Shirley McGrody
3071	Ashleh Desborough
3075	Peter Gerhard
3077	Brett Simon
3078	Richard Watts
3079	Shelley Daniel
3080	Hollie Roach
3081	Damon Royle

Submission number	Submitter
3085	Catherine Fry
3086	Peta Tynan
3088	Jeanette Pye
3089	Joan Dixon
3090	Christopher Beaver
3091	Gillian Stone
3094	Kevin Sellers
3096	Robyn Juteram
3097	Raymond Nowland
3098	Megan Lewis
3100	Sharyn Brock
3103	Wendy Davis



www.elton.com.au