



We are now accepting email submissions. The form below must be filled out and attached in an email and sent to [ifoa.remake@epa.nsw.gov.au](mailto:ifoa.remake@epa.nsw.gov.au) If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.

**Make a submission – Contact Details**

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Community group	Local Government	Aboriginal group
Industry group	Other government	Forest user group
Environment group X	Individual	Staff

**Other, please specify:**

**Organisation name:** International Fund for Animal Welfare (IFAW)

**What is your preferred contact method (circle):** Mobile, Email or phone? Email

**Would you like to receive further information and updates on IFOA and forestry matters?**  
YES

**Can the EPA make your submission public\* (circle)?**

Yes X    No    Yes, but anonymous

**Have you previously engaged with the EPA on forestry issues?** No



### **Make a submission – Form**

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

The prioritisation of timber extraction over conservation.

Because the intensification of logging, particularly in the NE NSW, will lead to the detriment of environmental values and negatively impact on wildlife conservation and welfare, particularly of koalas.

#### **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?**

#### **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?**

By prioritising timber extraction over environmental protection, in IFAW's opinion the new IFOA abandons the commitments NSW made under the National Forest Policy Statement in 1992, including the concept of Ecologically Sustainable Forest Management.

Increasing in intensity of logging - a 180-fold intensification of logging—throughout a 140,000ha zone with 2,200 hectares allowed to be clear-felled each year. The magnitude of this escalation can only be driven by the prioritisation of timber extraction over conservation.

The intensive harvesting will render the 45ha practically useless for hollow-users like gliders for centuries, and the short return time (10 years) to adjacent coupes means forests will be rapidly simplified over large areas. Each Local Landscape Area (= a 1,500ha area of forest) can be cut over in 21 years so specialist species will probably never be able to use harvested parts of LLAs again for denning (due to the lack of hollows), they will likely have limited utility as food resources and they are likely to act as barriers to dispersal (potentially mitigated by the size and configuration of clumps and exclusions, which are not yet clear).

### **Koalas**

Of particular concern is the impact this new regime will have on koalas. Of great concern is the extension of 140,000ha of coastal forests in an intensive harvesting zone between Taree and Grafton—incorporating much of the proposed Great Koala National Park.

Every population of koalas in NSW, bar one or two, is believed to be in decline. Because of this dramatic decline, the species was listed as Vulnerable in the state in 2012 (along with QLD and ACT). Habitat loss is the number one cause of this decline. Koalas like big trees and mature forests that are well connected across the landscape. Intensive logging is literally destroying their homes and is a key driver in the ongoing decline of the species. These new rules will only exacerbate this decline.

These new rules include a worrying change from searching for koalas in northern NSW to a predictive habitat model with prescriptions. Some 200ha of previously identified Koala High Use Areas (HUAs) are to be carried over, where they haven't since been logged, though these are not recorded in a digital database and are therefore largely unknown. Two models (DPI predictive habitat model and OEH koala likelihood model) are used to map forests according to habitat quality, which then determine prescriptions. The highest prescription (when both models



return 'high' values) is the retention of 10 feed trees of minimum 20cm diameter per hectare in each map cell (6ha). The other prescription is retention of 5 feed trees of 20cm per hectare if mapped 'moderate habitat' cells cover 25% of the net harvestable area.

There are several problems with this approach: there is no longer a requirement to look for koalas and fully protect the areas they are actually using. And, as koalas prefer big trees and mature forests, trees of just 20cm are sub-optimal habitat and 80-90% of them are not used; there is no requirement to preferentially select trees with evidence of koala use; modelling koala habitat is not an accurate predictor of koala occurrence because of the influence of previous disturbance and socio-biology.

The NRC instructions to remap and rezone old growth are to make up for a timber shortfall anticipated as a result of these prescriptions, *not* from the koala reserves announced in the koala strategy. The koala reserves therefore hold no exploitable timber, and in some cases very few koalas, and it is not yet demonstrated that prescriptions will result in a timber shortfall to justify logging old growth—in fact this is implausible as trees of 20cm cannot produce sawlog timber.

Opening protected old-growth for logging means revoking and logging areas included in the informal reserve system, agreed by the State and Commonwealth Governments as part of the Comprehensive, Adequate and Representative Reserve System. These areas were counted as contributing to forest ecosystem, national estate, and fauna and flora targets. Logging these areas is therefore logging the public reserve system. Opening areas believed to be permanently protected sends a strong message that permanent protections under the new regime are only permanent until they are not.

### **Giant, hollow-bearing, recruitment and eucalypt feed trees**

The new proposals are to retain all trees greater than 140cm diameter, except for blackbutt and alpine ash where the threshold for retention rises to 160cm. These trees were already required to be protected as hollow-bearing trees. Giant trees are old-growth. Logging trees of >140cm diameter is logging old-growth trees. This indicates clearly the desperation to obtain as much blackbutt as possible, but also indicates that Forestry Corporation anticipates the remapping of old-growth and reduction of headwater buffers to make available giant trees. All trees over 100cm should be protected regardless as a matter of urgency because they are now so rare in production forest landscapes.

The long-term survival of hollow bearing trees in the intensive and Eden zones is optimistic at best. It is of great concern that the new rules require no retention of recruitment trees (the next generation of hollow-bearing trees) outside of clumps. The current requirement is to retain one recruitment tree selected from the largest trees for each habitat tree. This is inadequate. The practical implication of this is that there will be no trees to replace the remaining hollow-bearing trees when they die. This will mean that hollow bearing trees will disappear over time. Requirements to retain mature eucalypt feed trees are to be removed. In practice this will mean large tracts of the harvest area devoid of nectar resources—important for critically endangered species like the swift parrot and regent honeyeater.

The harvest areas are likely to functionally collapse in an ecological sense in the medium term, as their ability to provide resources required by forest species will be almost non-existent.

#### **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)?**



IFAW is concerned about how permanent this environmental protection really is if old growth is being remapped in informal reserves and riparian buffers are being opened up to logging.

It is of great concern that most species-specific prescriptions are to be removed and replaced with permanent retention of clumps on different scales. And koalas will only need to be searched for in southern NSW, where they are almost extinct, but even then only in a small proportion of forests.

A minimum of 20% of each LLA is proposed to be protected. However, in many LLAs this is not additional protection, because existing exclusions already protect in 20% for most LLAs according to the panel. Further, any conservation gains through the 20% rule will likely be lost via increased logging intensity in the rest of the landscape.

IFAW is concerned that wildlife habitat clumps and tree retention clumps will replace current requirements to survey occupied habitat for a raft of threatened species. Subjectively chosen patches are no substitute for actual habitat. That these are to be selected by the Forestry Corporation at their discretion, with timber supply a primary consideration is of additional concern.

Permanent retention over many logging cycles is good in theory, but the new proposals have lots of uncertainties and are undermined by the loss of species-specific exclusions and the dramatic increase in logging intensity throughout the rest of the landscape because of the requirement to maximise timber extraction. For such an approach to have any validity they would need to be based on surveys to ensure the clumps encompass the best threatened species habitat and identified by experts independently of the Forestry Corporation. The lack of monitoring data upon which to base decisions, and subsequent uncertainty around those decisions is evident in the expert panel report.

Clumping may work in a system with sustainable logging rates (i.e. where selective harvesting is still applied and the surrounding landscape is permeable to species), but is unlikely to effectively protect the full suite of species when the key motivation is clearly timber extraction. It is proposed that previously unmapped rocky outcrops can be included in habitat clumps. They should have been protected already.

The substitution of protection for habitat actually utilised by threatened species for subjectively chosen clumps will have disastrous consequences for many threatened species.

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

The new regime is supposedly to be accompanied by a monitoring program 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'll be monitoring species to 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. This simplified and much riskier approach means the consequences will be far higher.

This approach is a huge landscape-scale experiment using some of the world's most biologically diverse forests. Implementing this approach with the degree of uncertainty evident discards the



precautionary principle and discards the principles of Ecologically Sustainable Development and Ecologically Sustainable Forest Management.

## 6. General comments