



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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**

**First Name\*:** Paula Flack

**Last Name\*:** President

**Phone:**

**Mobile\*:**

**Email\*:** [REDACTED]

**Postcode\*:** [REDACTED]

**Country\*:**

**Stakeholder type (circle)\*:**

<b>Community group</b>	Local Government	Aboriginal group
Industry group	Other government	Forest user group
<b>Environment group</b>	Individual	Staff

**Other, please specify:**

**Organisation name:**

**Nambucca Valley Conservation Association Inc.**

The Nambucca Valley Conservation Association Inc. (NVCA) is a voluntary community group which has operated on the NSW mid north coast for over 30 years and which maintains a long-standing and strong interest in forest management, in particular in public native forests in the north east region of NSW.

**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**      No      Yes, but anonymous

Have you previously engaged with the EPA on forestry issues?

Yes

### Make a submission – Form

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

The proposed IFOA abandons any concept of Ecologically Sustainable Forest Management 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'.

We no longer support logging in public native forests due to the disgraceful mismanagement and overlogging we are witnessing in the real world.

We therefore strongly object to the IFOA.

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?

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)?

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

NO



## 6. General comments

The time is well overdue that this government recognises that the Regional Forest Agreements have failed to deliver environmental protection or industry security. It should also be aware that it has lost public confidence not only in terms of managing our public native forest but its ability to appropriately and openly consult with the community on forest issues.

We are aware that 5,425 submissions to the RFAs were received, with only 23 supporting the Government's proposal to extend the RFAs for 20 years and give additional five-year rolling extensions after each future five-yearly review, and nearly all those 23 were from the timber industry. We are shocked that despite the results of the RFA consultation, the government has pushed on with its intention to increase harvesting intensity and weaken environmental protections.

There is growing appreciation of the significance and long term and critical importance of forest values other than wood (which is dwindling at an unprecedented rate thanks to irresponsible overcommitment in the wood supply agreements). Polling in the electorates of Ballina and Lismore show that 90% of people prefer forest protection over logging. Two recent polls in the Coffs Harbour Advocate showed 1) 93 percent of respondents supported the Great Koala National Park proposal while 5 percent didn't and 2) 89 percent of respondents said they would be voting for parties and candidates who support the Great Koala National Park plan.

Our remaining public native forests are worth more to us left standing and are vital for the future of regional economies and ecosystems. We are disappointed and angered by this government's ongoing denial of the scientific evidence and ignoring of community concerns about threatened species decline, loss of forest values and unsustainable logging.

Our members are outraged by this governments intention to break its repeated promise that the new IFOA would result in *"no net change to wood supply and no erosion of environmental values"*.

Available wood supply data, for north-east NSW shows currently 177,700 m<sup>3</sup> per annum of large and small high quality sawlogs from native forests and hardwood plantations is committed to sawmillers in Wood Supply Agreements. We are aware that the NRC based its considerations on 237,000m<sup>3</sup> per annum. This is an increase of 59,300m<sup>3</sup> above current wood supply commitments!

We are also aware that the NRC concluded *"it is not possible to meet the Government's commitments around both environmental values and wood supply"*, yet bizarrely the NRC recommended opening up protected old growth areas and rainforest to make up the 7,600 – 8,600 annual short fall in available timbers - a shortfall that appears to have been created at least in part, by increasing annual wood volumes by 30%.

No amount of green wash and word smithing can alter the facts that the proposed IFOA will result in logging of areas which are currently protected as habitat for threatened species, koalas, old growth forest, rainforest and stream buffers. Its will also result in escalating



unsustainable intensive and clear fell logging. Our forests are being cut down much faster than they can possibly grow back, its is irresponsible and unacceptable.

We want to see our public forests managed for the public good. Uses such as tourism, recreation, environmental repair, carbon sequestration and storage, wildlife habitat, provision of clean, abundant water and local amenity. We do not want to see further loss of forest values though industrial scale logging or further spread of logging associated disease (BMAD) in our forests.

The native forest sector operates at a loss and is subsidised to survive. In effect NSW taxpayers are unwittingly paying NSW Forestry Corporation (FC) to destroy their natural asset and future opportunities for sustainable uses of our native forest. The free ride FC has had for years in our public forests must cease. It is time to stop propping up the rapacious native forest logging industry at the cost of species extinction, logging dieback, reduced stream flows, water quality decline and sustainable forest based jobs.

It is of little wonder this Association and the many members of the public we are connecting with over the plight of native forests, have lost all confidence in this government's ability or willingness to seriously consider the long term ecological and economic futures of our public asset. It is a shameful legacy that the NSW coalition government is potentially leaving – but it is not too late to turn this appalling situation around and do the right thing by the NSW public and our forests.

Future generations must have the chance of benefitting from the ecoservices and non-logging economic opportunities our public native forests provide. Those benefits will of course increase over time as forests recover, rather than being rapidly squandered away as they are under this current abysmal regime.

There are alternative and sustainable uses for our remaining public native forests that are far more acceptable to the vast majority of people. Proposals like the National Parks Association of NSW's Great Koala National Park and Great Southern Forest should be established as an immediate priority.

NVCA recommendations:

- 1 End the logging of public native forest and a complete transition of the timber industry to 100% plantations.
- 2 Transfer all existing subsidies from native forest logging into management and rehabilitation of public native forests.
- 3 Transfer public native forests to protected areas when the RFAs expire.
- 4 Create the Great Koala National Park and the Great Southern Forests National Park as proposed by the National Parks Association of NSW.
- 5 Conduct a review of the logging industry considering climate change, conservation, socio-economic issues and support for the logging industry, as recommended in the Waller report into the RFA consultation.





The NVCAs concerns regarding the specific information contained in the IFOA Conditions and Protocols are consistent with those expressed in the detailed submissions lodged by the North East Forest Alliance and the North Coast Environment Council.

Paula Flack

President