



Respondent No: 491

Login: Anonymous

Email: n/a

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IP Address: n/a

- Q1. **First name** [REDACTED]
- Q2. **Last name** [REDACTED]
- Q3. **Phone** not answered
- Q4. **Mobile** not answered
- Q5. **Email** [REDACTED]
- Q6. **Postcode** [REDACTED]
- Q7. **Country** not answered
- Q8. **Stakeholder type** Individual
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** not answered
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** No
- Q14. **Can the EPA make your submission public?** Yes, but anonymous
- Q15. **Have you previously engaged with the EPA on forestry issues?** No

Q16. What parts of the draft Coastal IFOA are most important to you? Why?

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.

Q17. What parts of the draft Coastal IFOA do you think have a positive outcome on the management of environmental values or the production of sustainable timber? Why?

2 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.

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

The draft coastal IFOA will allow the intensification of forests by another 50%. This will cause these most diverse eucalypt forests in the world to become completely degraded. This logging is unsustainable.

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

4 There are totally inadequate protections for the biodiversity of this landscape. Protections of hollow bearing trees has been reduced. There is no requirement to retain recruitment trees for hollow bearing outside of clumps. Areas of high koala use habitats are now destined for intensive logging. On the mid north coast searching for koala will no longer be required. The draft IFOA has based limited environmental protections on little baseline data and poor monitoring practices in the past. 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.

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

5. 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. Logging can take place in each local landscape over 21 years with a 10 yr return time to adjacent coupes. The single species forests are more susceptible to catastrophic fires. Over quotas of amount of timber available means smaller and smaller trees are removed. The timber industry needs to become 100% plantation planted on already cleared land. The industry has continued to be subsidised by the gov't despite losses. Logging of native forests is not sustainable.

Q21. General comments

On the department's website it states that the current IFOAS do not take into account advances in technology, advances in knowledge and operational practices. How do the draft IFOAS differ? New industrial logging is much more damaging to the forests with larger turning circles and wider roads. The technology requires minimal employment as compared to the modern service industry such as tourism. New science on climate change challenges means keeping these forests for carbon sequestration and storage more important than ever New knowledge of medicinal honeys as important replacements of antibiotics make these forests more valuable than ever Ecological knowledge shows more and more the interdependence on species to retain a healthy forest. I have seen for myself the clear felled coupes where no animal can survive and the previously logged forest is now invaded with large tracts of lantana. Lantana prevents forest seedlings emerge, bellbirds invade the area and drive out the local bird species and dieback is the consequence. This is not a sustainable. I believe the gov't has not adapted to changes in knowledge. It must realize it is time to stop subsidising logging of old growth forests and adopt a new industry of preservation of our biodiversity, employing more people by creating the Koala National Park.

Q22. **Attach your supporting documents (Document 1)** not answered

Q23. **Attach your supporting documents (Document 2)** not answered

Q24. **Attach your supporting documents (Document 3)** not answered
