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Responded At: Jul 13, 2018 16:43:45 pm

Last Seen: Jul 13, 2018 16:43:45 pm

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- Q1. **First name** Beth
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- Q6. **Postcode** [REDACTED]
- Q7. **Country** Australia
- Q8. **Stakeholder type** Environment group
- Q9. **Stakeholder type - Other**
not answered
- Q10. **Stakeholder type - Staff**
not answered
- Q11. **Organisation name** National Parks Association of NSW
- Q12. **What is your preferred method of contact?** Email
- Q13. **Would you like to receive further information and updates on IFOA and forestry matters?** Yes
- Q14. **Can the EPA make your submission public?** Yes
- Q15. **Have you previously engaged with the EPA on forestry issues?** Yes
- Q16. **What parts of the draft Coastal IFOA are most important to you? Why?**
Protection of the environment and threatened species, vital in NSW important tourist zones like the North Coast, and for an ecologically sustainable future for NSW
- 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?**
None, because no capacity for taking scientific advice or for monitoring

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?

All of them, especially the mapping and rezoning for intensive logging zones

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)?

Not effective, no capacity for implementing or monitoring, because of corporatisation and cutbacks to Departments

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

No; undoubted severe impact on environment and only short-term timber supply, not ecologically sustainable and not taking account of accelerating climate change impacts.

Q21. General comments

I commented more fully on above and saved and continued but did not send,, lost them when tried to attach as below. Will now try to send attachment below, which addresses above issues

Q22. Attach your supporting documents (Document 1)

[Redacted]
[Redacted]
[Redacted]
[Redacted]

Q23. Attach your supporting documents (Document 2)

not answered

Q24. Attach your supporting documents (Document 3)

not answered

Submission IFOA Jly13 2018 Beth

Dear Environment Protection Authority,

Do not implement the new Integrated Forestry Operations Approval

I strongly oppose the Government's proposed changes to the Integrated Forestry Operations Approval (IFOA) on the grounds that they are clearly ecologically and economically unsustainable. I beg the Government not to implement these current proposals.

Proposed clear-felling 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' – all these proposed changes in the draft Coastal IFOA rely on blatant manipulation of data to try and overcome excessive past logging to fill unsustainable quotas. This appears to be a desperate attempt to find enough timber to fill renewed quotas for a further 20 years logging.

It is farcical to call this ecologically sustainable forest management (ESFM).

The draft Coastal IFOA sets out new rules for how native forestry operations can be carried out in coastal production forests in NSW - by changing the definitions for all conditions meant to protect the forest ecosystems, threatened species and the environment. This involves dishonestly 'remapping and rezoning' old-growth for logging; reducing headwater stream buffers distances; permitting the logging of 100 cm dbh giant trees, and approximately doubling the intensity of logging in the 'selective harvesting zone'.

The re-mapping and rezoning is strongly reminiscent of the new clearing regulations introduced with the new Biodiversity Conservation Act, allowing greatly eased rules for self-managed clearing that will inevitably result in greatly increased broad-scale clearing and degradation of the environment completely at odds with the idea of ecologically sustainable development. These vegetation regulations and mapping are being strongly challenged by scientists and many well-informed environmentalists. Did the same 'expert satellite image interpretation team' help with the re-mapping and re-zoning of forest ecosystems for the Forestry Corporation?

intensification of logging in the North Coast Zone (which is one of the greatest tourist drawcards in NSW), apparently abandoning any commitment to ESFM, and without adequately considering climate change, conservation, socio-economic issues or appropriate support for the logging industry

This is equivalent to deliberately and dishonestly changing the goalposts mid-game. It **EMPHATICALLY DOES NOT RESULT** in "better balancing environmental outcomes and timber production".

I am deeply disturbed and concerned that the NRC has recommended these measures to allow such drastic

I have studied all the previous RFA documents and made submissions on management of most of the forests in the previous NSW RFAs. Almost always the then Forestry Commission's estimated sustainable yields did not support the proposed 20 year quota allocations, and in many instances it was estimated that timber supplies would be exhausted by the year 2000 - a clear warning that proposed harvesting rates in the 1990's were recognised to be unsustainable. No notice was taken, and overlarge quotas were issued for the RFA forests. It was hoped that eucalypt plantations would make up the shortfall, but that has not eventuated nor proved profitable for current quota holders like Boral.

Why must quotas be renewed at the same levels as before? Arguments about jobs and growth won't wash. 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 ignores reality..

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. Widespread declines in wildlife have prompted the Australian Senate to call an inquiry into our threatened species crisis.

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 shows 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 in the face of the changing climate 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 to use the end of the Regional Forest Agreements to transition out of native forest logging on public land over time, and to implement positive alternatives like National Park Association's [Great Koala National Park](#) and [Forests For All](#) proposals.

Yours sincerely,

(Mrs) Beth Williams OAM

13th July 2018