



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 If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

Last Name*: THOMPSON

Phone: [REDACTED]

Mobile*: [REDACTED]

Email*: [REDACTED]

Postcode*: [REDACTED]

Country*: Australia/NSW

Stakeholder type (circle)*:

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

Other, please specify:

BUSINESS

Organisation name:

NATURE.NET PTY LTD

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

EMAIL and/or MOBILE

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

YES PLEASE

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

YES

Have you previously engaged with the EPA on forestry issues?

YES

Make a submission – Form

Once completed email this form to ifoa.remake@epa.nsw.gov.au



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

Ecosystem services - including 100-year Forest Carbon Credits, Arboreal Biodiversity, and Regional Jobs (Socio/economic). Whatever happened to ESFM?

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?

Remnant 'Clumps' would be much more valuable and profitable if more regional jobs were funded by 100-year Carbon Credits across 100% of the Eden & Southern RFA Regions.

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?

(a) Logging even more Old-Growth Trees beyond 2018 an avoidable, affordable and unforgivable threat to Australia's unique Hollows-dependent Threatened Species animals (refer EPBC).

(b) Nature-based Tourism Jobs on our 'Unspoilt' South Coast are lost via this Coastal IFOA. We are killing the 'goose that laid the golden egg' from Jervis Bay to Victoria.

(c) 'Clump' islands of native forest would destroy potentially unique and irreplaceable 'Alps-to-Coast' World Heritage connectivity – and tourism jobs. These unique Australian Eucalypt Forest Ecosystems and TS (including references in the 20-year-old Eden and Southern RFAs - plus latest EPBC Listings and opportunity for connectivity to NSW 2008 National Heritage Listed 'Australian Alps' National Parks (Eden Tumut sub-region).

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)?

See above threat to 'Alps-to-Coast' World Heritage project that I am working on, with encouragement from former NSW NSW Environment Minister Bob Debus.

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

This draft Coastal IFOA, thousands of 2018 submissions, your own NSW NRC Report and Independent NSW RFA Review Report (tabled 25-Jun-18) told you your timber commitments are incompatible with your environmental 'green-wash' (refer our focus on the underlying RFAs below as 'General comments'.

6. (Continued – overpage – General comments)



General comments - on Joint NSW RFAs which set the *platform for the Coastal IFOA*.

We note your *Joint Statement on your Independent Review of NSW Regional Forest Agreements* (RFAs) after tabling it in Federal Parliament 25-Jun-18. We await your response to their **16 recommendations*** to improve delivery of NSW RFAs. Our concern is *narrowness of our Governments' Statement's* over-simplified '*key themes*' of this forester's review **as per:**

1. 'Governments commitments to RFAs'

Note prior commitment to both the NSW Industry Roadmap & RFA Renewal.

**Recommendations#1&2. Support adaptive management & statutory change (e.g. Arboreal TS & 100-year Carbon Credits?)*

2. 'Government coordination of forest management and reporting';

If we focus on 'forest health', where did ESFM go?

** Rec#7 · Collaborate to engage community interest in the sustainability indicators.*

Also comply with Australia's UN obligations?

2. 'Alignment and streamlining of reporting requirements; Renewed RFAs continue to require *five-yearly reviews.*'

**Rec#3-6. Coordinate shared services, research, community engagement and collection of reporting information.*

Fortunately, *now* "The NSW and Australian governments are committed to improved accountability and transparency." (Statement day after tabled in Federal Parliament 25-Jun-18)

3. 'Updated forest management practices and the changing environment;

Governments committed to *continuous* improvement and *contemporary* forest management practices, reflecting *emerging* issues including **climate change**, the **carbon economy**, socio-economic issues, and opportunities to **enhance carbon storage in forests and products.'** *We congratulate both of our Australian Governments on the paragraph above (26-Jun-18).* As a member of Australia's Climate Market Initiative (CMI), Australia's Forest Stewardship Council (FSC), and organiser at ANU of *Australia's 4th 'Forest & Climate Action Forum'*, we look forward to assisting our Governments on *2018 Climate/Energy/Forest Plans*.

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(Continued) **3. Updated forest management practices and the changing environment**

Recommendation#10. 'The parties conduct a contemporary review of the native forest timber industry considering the effect of climate change, the overall conservation status of the forest, the socio-economic position of relevant rural communities and support for the industry'.

Even the Forest Institute's Chair agrees Eden wood-chipping deception has cost RFAs their 'social licence' on his/our 'Unspoilt' South Coast. Why not defer in NSW as already agreed in Victoria?

Will Australia's 2018 Paris Rulebook & 2021 Carbon Stock-take require more detailed 5-yearly National Forest Accounts (as per RFAs)?

- 4. 'Preparing future RFAs';** We welcome your *Independent Reviewer Recommendations* as part of your RFA Review.
- *Rec#9 Adequately resource field compliance of logging operations, and consider a 'better model' (for Coastal IFOA)? Strategic decisions need 'scenario options'. Should Governments now evaluate 100-Year Regional Forest Carbon Credits?*
 - *Rec#11. NSW meet the industry ... include a wider audience, such as local govt. ... shared with the regional community.*
 - *Rec#12. Ensure forest research is effectively (and ethically?) managed – such as (existing?) threatened species c'tee?*
 - *Rec#13. NSW RFAs to require a detailed and well-presented analysis of the conservation status of the forest (not 2018?)*
 - *Rec#14. Ensure RFAs consider risks associated with climate change and ... adapt to changing environment (new idea?).*
 - *Rec#15. In RFA reviews, report on the Science of Forest Carbon ... including **opportunities to enhance carbon storage in forests.***

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5. **'Further information and next steps' (on IFOAs and their prerequisite NSW RFAs);**

Both the NSW and Australian Governments are preparing a formal joint public ***response report** to the **their forester's Independent NSW RFAs Review** tabled in Federal Parliament 25-Jun-18.

Thank you for this opportunity to respond by 13-Jul-18.

Our final submission on this matter naturally awaits your Governments' response report to your independent forester's Review of NSW RFAs (25-Jun-18).

As 'next step' on RFAs and their IFOA, can NSW and Australian Government please start collaboratively answering our questions?

13-Jul-18