



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If this form is not attached or incomplete the submission will be lodged as confidential and will not be published.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

Last Name*: Dennis

Phone:

Mobile*: [REDACTED]

Email*: [REDACTED]

Postcode*: [REDACTED]

Country*: Australia

Stakeholder type (circle)*:

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

Other, please specify:

Organisation name: No Electricity from Forests

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

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?

We are a group of residents from the Mid North Coast Region, Northern New South Wales, extremely concerned about the increasing intensity of logging in our local native forests. In January 2018, we formed a new organisation called **NO ELECTRICITY FROM FORESTS- (N.E.F.F.)**

NEFF's purpose is to campaign to stop the harvesting of wood as a source of fuel for electricity generation from both public and private native forests. We intend to highlight how the development of low value markets for wood as fuel to generate electricity contributes to the accelerated degradation of our native forests with severe negative impacts on the environment, biodiversity and climate.

We view all parts of the Draft Coastal IFOA as important. We are particularly concerned about the following aspects:

1. The lack of published results of the timber volumes assessment processes, the lack of clarity on how timber harvesting volumes were determined and the basis of how the proposed wood supply agreements were determined.
2. How the new logging rules will enable an unprecedented massive increase in clear fell, by some reports a massive 180-fold increase over past allowable limits of 0.25 hectares and single tree selection. This can only lead to massive damage to the integrity of North Coast forests as viable ecosystems, replacing them with single species Blackbutt plantations - effectively converted them to ecological deserts. They will not return to functioning biodiverse native forests in the life time of many generations, if at all.
3. The weakening of environmental protections or in some cases the abandonment of them completely. Past rules aimed at supporting and protecting the environment are rendered meaningless.
4. The remapping of Old Growth and previously reserved areas of forest which provide in many instances, the last viable habitat available to plants and animals, many rare and endangered. We find the NRC published findings of trials reporting 78% of previous Old Growth forests mapping was inaccurate very disturbing. Remapping would allow the Old growth previously excluded from logging to be harvested.



5. The planned harvesting of small logs, so called forest residues, to be wood chipped and pelletised to fuel power stations here on the North Coast, other regions and overseas

countries such as Asia and Europe: the impact this will have on increasing CO2 emissions and our ability to meet our obligations under the Paris accords. Wood is not a renewable, carbon neutral source of energy.

6. The transfer of the Forestry Corporation to Land Services. The EPA has failed in many instances, to carry out its statutory role as watch dog (Auditor Generals reports). Land Services is not resourced or equipped appropriately and is unlikely to be able to administer this complex area of land management to meet statutory and administrative requirements producing even worse results than the EPA.

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?

The only positive aspect of this whole process is the fact that we have been given an opportunity to comment, albeit in a faux consultative process which seems to have predetermined outcomes.

This can be the only conclusion reached when you examine the difference in emphasis and opinion in comments from the expert panel, the EPA and the NRC on the effects of the logging prescriptions proposed in the draft Coastal IFOA. The proposed harvesting contracts can only be met by ignoring the need for environmental controls and regulation. The expert panel stated that "the intensive harvesting zones are being formally introduced to prop up an unsustainable wood supply arrangement at the expense of the environment".

Nevertheless, while this whole process seems designed to restrict information and limit public input, we reluctantly accept it as better than nothing. At least it helps to partially lift the veil of secrecy surrounding the new rules of logging. Unfortunately, it reveals the extent of the unprecedented changes which will cause enormous damage to native forests in our region; changes which no amount of spin doctoring by forest industry marketeers, who seem to be determining public policy these days, can hide.

It should be the science and expert opinion of independent professionals determining what is needed to protect the environment and the public interest in forest management. There is no evidence of any effort to independently and expertly assess the environmental impact of the (illegal) intensive harvesting on the north coast for the last 11 years. These new rules are only going to intensify this logging impact. Indefensible!



The IFOA consultations process provides an opportunity to inform the public of the real intentions of changes to the rules which seem designed to facilitate the increasing privatisation of public native forests to achieve only one end where state forests have only one value: maintaining a wood supply (from ever diminishing volumes) to a failing industry, supported by large handouts of taxpayers' money.

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?

The draft Coastal IFOA's set out how the Regional Forest Agreements apply in practice. The rules they apply are "supposed to 'integrate' safeguards for streams, soils and threatened species like koalas, owls, quolls and gliders. They're meant to protect the habitat of plants and animals so that diverse forest ecosystems can continue to thrive they must also deliver 'no net loss in wood supply'.... two objectives fundamentally incompatible.

The Natural Resources Commission (NRC) found the two objectives 'are not mutually achievable' The NRC went on to recommend making up the shortfall by recommending remapping and rezoning of old growth forests and rainforest 'to see if it is mistakenly classified' – this means in effect reducing the extent of the forest reserve network- (by some estimates up to 70 to 80%)- supposed to be permanent, to allow access to timber". – 'Forest law Frenzy in NSW' by Nari Sahuker, EDO NSW solicitor, 15 June 2017

Given this background there is only one answer to the question posed as to what parts of the draft IFOA have negative outcomes for the environment. That is, it is the whole process of the current flawed rules and regulations attempting to maintain wood supply without regard to the detrimental consequences to the environment.

The following points are irrefutable:

The present industry plan, supported by the NSW Government and Forestry Corporation, is to massively increase clear felling of native forests, under a regime of minimum regulatory control to meet agreements to maintain wood supply volumes.

A significant allocation of the timber harvested will be wood chipped and pelletised using small diameter whole logs to burn them for electricity generation here on the North Coast, (Bulahdelah, Kempsey and Grafton are considered possible sites by some) and other locations or to export markets in countries such as Japan, China, Korea and Europe for the same purpose.

Future industry resources demands are estimated as more than one million tons per year. They will be guaranteed under discredited Regional Forest Agreements for the next 20 years. Past harvesting practice suggests the projected volumes are widely over estimated, especially if they are kept within the appropriate environmental limits needed to protect biodiversity and are unsustainable.

Current harvesting volumes are already having serious detrimental effects on our fragile forest ecosystems and climate. Further intensive harvesting of wood to be used as fuel to produce electricity is destructive, senseless and counter to all scientific norms.



Logging for fuel to produce electricity will be done on such a scale that it can only have disastrous consequences: the replacement of the existing extremely diverse forest communities on the North Coast with single species plantations, turning them into biological deserts with mass extinctions of many threatened and endangered species of flora and fauna.

A case in point are the Koalas found in our local forests. They have been severely affected by loss of habitat already – reflected in the fact that their numbers have declined by as much as 50% over the past 15- 20 years in our region due in no small part to overcutting, illegal clearing and generally poor controls of forest logging and land clearing. Expert opinion says that they will be extinct locally in 50 years. The recent reports of very low numbers of juvenile koalas in our Mid North Coast region suggest this could be much sooner given the average lifespan of a koala is 10 years.

Forest industries and local companies have been organising and campaigning to reduce regulations and increase access to forest resources for some time. They have invested heavily in plant and equipment and a large public relations campaign to influence politicians at federal, state and local government level. This includes requesting and being given financial support through government subsidies and grants. There are credible estimates of an existing State subsidy of over 11 million dollars per annum*. (Australia Institute: “Money doesn’t Grow on Trees”)

The forest industry demand for timber volumes also requires intensified logging of forests on private land. Some in the Forest industry sector are seeking to allow logging in National Parks to expand resource availability to meet the projected demand.

By some estimates there are only 600 people directly employed in the NSW timber industry. The promised job increases are limited by further automation and mechanisation and will be short term as they overcut the resource. These jobs could easily be absorbed by increased opportunities linked to tourism, and in native forest management directed towards conservation and rehabilitation and setting up and maintaining plantation forests.

Highly mechanised industrial forestry practices compound environmental damage, and is akin to mining, as the forest will not be able sustain the volumes of timber needed to continue operations. They will run out of supply, leaving the public with seriously degraded forests with a host of many long term negative impacts. These will be felt throughout the community for generations to come.

Climate change is another serious consideration. There are many adverse climate change impacts from harvesting trees, including impacts on water quality and soil erosion. Our standing forests have an important role to play as carbon sinks and they should be allowed to function as such. Burning wood, a carbon-based fuel, will produce massive CO₂ emissions equivalent or worse to those released when burning coal.

There are alternatives - we all know we must switch to renewable sources such as solar, wind and other solar driven sources such pump storage, tide and ocean waves. The science is now unequivocal – wood as a source of energy is not renewable carbon neutral source.

It has been estimated that 10% of global anthropogenic emissions in 2010 were accounted for by deforestation and land use changes.



Article 5 of the Paris Climate agreement refers to the importance of forests as the only realistically deployable carbon sinks, stating *“Parties should take action to conserve and enhance, as appropriate, sinks and reservoirs of greenhouse gases...including forests”*

Harvesting forest wood for fuel undermines this key Paris Agreement goal, as well as threatening biodiversity and a host of other ecosystem services that forests provide.

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)?

There has been a failure of governance at all levels. The legislative changes have been designed to meet industry needs not the public interest of maintaining healthy ecosystems and biodiversity. No rigorous examination or consideration has been given to allowing for climate change and the role forests should fulfil to curb CO₂ emissions.

The Forestry Corporation and the EPA have failed to administer the necessary regulatory frameworks to maintain public confidence in how our forests are managed.

The Forest Corporation and EPA should be acting as guardians of forest. There has been a total lack of transparent and accountable practices. The industry increasingly acts as a law unto itself with a culture which ignores the need for genuine scientific environmental assessments to ensure adequate protection for wildlife and discourages the development and application of other environmental safeguards. There are many examples of these failures and illegalities which are not enforced, prosecuted lightly or ignored.

“Reflecting on offences in 2011, the Land and environment Court found the Forestry Corporation showed ‘a pattern of continuing disobedience.... Or at the very least, a cavalier attitude to compliance’.” – ‘Forest law Frenzy in NSW’ by Nari Sahuker, EDO NSW solicitor, 15 June 2017

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

NO. The Auditor General reports of the EPA’s performance in relation to fulfilling their statutory role of protecting the environment show us that we cannot expect ethical, responsible corporate behavior or that the NSW government is serious or capable of curbing their excesses. The public needs to know the fine print of the contract being offered in relation to the forest they own. The Murray Darling River Basin fiasco and more recently the Banking Royal Commission show the failure of government to control excesses and illegality and the importance of proper oversight. Do you trust the Forestry Corporation? Can you believe what they say? The reputation of corporate Australia is in tatters. We need a fully transparent, independent review of the forest industry and its regulators in this state.

There is a growing disquiet that powerful vested interests are undermining public confidence in government, destroying the social license forest industries must have to operate their businesses. The continued over allocation of non-existent wood supplies is especially egregious when it is propped up with huge and seemingly growing levels of subsidies and the



loss of so much of our natural heritage. Added to this now is the poisoning of our atmosphere with CO2 pollution by harvesting and burning wood when we seriously need to be reducing our dependence on carbon-based energy sources.

6. General comments

The government must abandon its proposed changes to native forest management and the massive increase in the intensification of logging as outlined in the draft Coastal IFOA. This recognises that the Regional Forest Agreements have failed to deliver either environmental protection or industry security they promised. A new approach is needed!

The government needs to assure us that native forests will not be wood chipped, pelletised and burnt as fuel for electricity. They have a far more important role in carbon sequestration and should be allowed to act as carbon sinks to help achieve our targets for reducing emissions.

The government should commit to a just transition out of native forest logging and commit to an industry based on plantation forests and provide a system of new permanent reserves to protect water catchments, prevent soil erosion and provide habitat for koalas and other endangered and threatened animal and plant species. We must insure fully functioning diverse natural forest ecosystems into the future.