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Q7. Country	not answered
Q8. Stakeholder type	Other
Q9. Stakeholder type - Other	Primary producer - food producer. Concerned member of the National Party.
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?	Yes
Q14. Can the EPA make your submission public?	Yes
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?

The entire draft Coastal IFOA is important to me. As a North Coast landholder and a farmer producing food all my life, I am disgusted at this failure to recognise the importance of our public native forests and habitat for our unique wildlife. As a taxpayer and a ratepayer I am appalled at the squandering of important public assets and waste of public funds subsidising an unsustainable timber industry. I am a member of the National Party but am unable to vote for policies which ensure destruction of our environment. We have a responsibility to consider the important place of all species in our eco system and beyond that it ensures a healthier life for our people. Unfortunately I have already observed the decline of some species in my lifetime. I have grave concerns about the erosion of environmental protections in the draft Coastal IFOA and the impact on our native forests, local environment, koalas and other unique wildlife, and our waterways.

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?

The provision of the mapping of streams and threatened species in the draft Coastal IFOA appears to be a valuable contribution to environmental values, assuming that the purpose was to ensure that streams and threatened species would be excluded from timber harvesting. This would provide a reasonable balance between environment and sustainable harvesting. However I was disgusted to note statements in the executive summary of the IFOA, making the point that timber harvesting will be prioritised over any environmental concerns and "to ensure this increased protection does not impact on the supply of timber" buffer zones around streams will be reduced from 10m to 5m. Honestly, how can this be reasonable? How can this be even contemplated? I have observed local logging sites which prove the inability or unwillingness of loggers to avoid incursions into even the current buffer zones of 10 metres, damaging or even obliterating headwaters altogether. Why reduce buffers to 5 metres? Why engage in the mapping streams if the headwaters are to be left unprotected? If it is not the threat from logging activity, what is the Government trying to protect the forest streams and threatened species from? Reading and re-reading the statements regarding environmental protections I find they can only result in confusing and misleading the public. They appear to be designed to discourage people from investigating the details in the draft IFOA. The protection of our headwaters is vital. Vital to the health of our waterways and livelihoods of users downstream like agriculture and irrigation. As an aside, I would like to refer to the Government's recent funding of a research project in this region, looking into the endangered Fleay's Barred Frog which is only found in close proximity to streams. Reducing buffer zones to 5 metres would sign their death knell. The proposed increased penalties for contraventions of the regulations, which on the face of it this would seem to be a welcome strengthening of environmental protections. However, given the changes to the environmental protections, significant environmental damage can and will occur without it amounting to a contravention of the IFOA. I am left with the conclusion that the draft Coastal IFOA will have no positive outcomes on the management of environmental values or the production of sustainable timber. Despite numerous statements throughout the document, the website and media releases referring to new 'protections' and 'limits', most of the actual protections for sustainability and threatened species have been stripped out of the new IFOA framework. Forestry practices under the existing RFAs have already proven to be environmentally unsustainable. The 50% reduction in the North Coast koala population in the past 20 years is at least in part caused by these practices. If the industry is not environmentally sustainable then it is certainly not economically sustainable in the long term. Truly, the remaining native forests cannot withstand a further 20 years of logging under the current practices, much less under the proposed new IFOA. The only way to sustainably produce timber is to transition from the dependence on our public state native forests, and to transform the industry to being 100% plantation-based. This transition will require planning and demand management whilst plantation supply is developed, with forest workers being retrained to rehabilitate damaged forests, control of lantana infestation and plant trees. Alternate building products such as hemp and bamboo should be investigated as well as recycled plastics, both could be utilised. This is where the energy of the Government and taxpayers' funds should be applied, if you are serious about the future of the timber industry. Our native forests and some of our wildlife are already on the brink of extinction, with over 1000 species on the endangered list. This is showing a total disregard for our responsibilities and other species. Once biodiversity is lost it is gone forever. It is irresponsible of Government to treat native forests purely as a resource to exploit without acknowledging their larger purpose in our environment and our lives and ensuring protection for the myriad of other species that exist in our native forests.

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 IFOA has the potential to open up significantly larger areas to harvesting by the timber industry by seeking to repeal those provisions that make forestry agreements prerequisites for IFOA. Regional Forest Agreements were originally made on the basis of important mapping efforts of old growth and otherwise significant forests, to ensure these were NOT open to logging. Conversely, the purpose of the proposed changes appears to be to reduce environmental protections and create access to areas that were previously excluded from logging. The draft proposal to consolidate the current separate licenses related to the harm of animals, plants and fish and pollution of waterways; replacing them with a single environmental licence to be issued to loggers is a concern. This has the potential to reduce the specific individual protections required for different ecosystems and species, and will result in less protections across the board. Logging intensity: the draft IFOA proposes 4 different types of logging: selective, intensive, mixed intensity and alternate coupe. This is neither appropriate or acceptable in our public state native forests. Even for the least intensive type "selective logging", this draft IFOA only requires 10 square meters of trees be retained per HA logged, which equates to only 0.1% of the total area – only 10 square meters out of 10 thousand - required to be left with any trees. This is totally irresponsible and cannot be considered in any way management of the environment. It is in effect clear felling which will result in rampant lantana and weed growth causing even worse dieback than we see in previously logged forests. None of which have been addressed or rehabilitated in anyway, instead abandoned by the industry to eventual death by dieback. Hardly sustainable harvesting of timber and certainly not management of our public state forests. The draft IFOA states that 'wildlife clumps' will be retained to protect threatened species. This is not sustainable or practical, and means that animals will be marooned in small clumps of habitat whilst the rest of the forest is logged around them. This cannot possibly be considered to be in any way environmentally sustainable. Wildlife does not flourish and indeed cannot survive in such circumstances in isolated clumps. This practice will contribute to further species extinction. Habitat hollows: Alarmingly the draft Coastal IFOA provides for only 5 hollow bearing trees to be retained per hectare. Again totally impractical. These important habitat features will prove useless if all the trees around them are felled. There is already a significant shortage of hollow bearing trees in our native forests and it takes many years for such hollows to form. This shortage of hollows is already resulting in issues with wildlife such as possums, gliders and bats being forced to find homes within areas of human habitat and buildings. This has prompted all the wildlife groups in this area to call for people to install man-made hollow habitats wherever they can. All hollow bearing trees in public state forests must be preserved if our unique wildlife species are to survive.

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)?

I believe that if this is adopted in its current form it will be highly effective, not only in the inevitable destruction of our native forests, our environment, our koala populations and our threatened and endangered species but also the logging industry itself. By opening up new and larger areas that were previously unavailable to logging, and saving Government from having to address the necessary important work of transitioning the forest industry from unsustainable native forest harvesting to a sustainable plantation forest industry, an important opportunity is being missed not only to ensure that the our valuable forest assets are protected for future generations and wildlife, but that employment opportunities continue in forestry.

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

Definitely not! The draft Coastal IFOA in its present form will certainly not be effective in managing either environmental values or a sustainable timber industry. The reduced protections in this draft could not possibly result in any sort of sustainable timber industry. See the points previously addressed. Honestly, this is an affront to anyone who is in any way informed in environmental issues or just enjoys getting out into the countryside and loves animals. With regard to 'managing a sustainable timber industry' it will not be sustainable because these proposals will result, in a very short time, in the destruction of our forests,

Q21. General comments

Having read the draft IFOA I find the media release put out on 15th May 2018 by Ministers Gabrielle Upton and Paul Toole is extremely misleading. I am gravely concerned that these ministers, our elected representatives chose to treat the public with such contempt. Particularly so as a long time member of the National Party. The media release refers to strengthening environmental standards as well as providing long term security of wood supply. This is a blatant deception! In fact, the provisions in this draft IFOA will achieve neither of these things, and are a retrograde step for biodiversity and conservation. It appears that they have been specifically designed to erode what few environmental protections currently exist, in order to reduce barriers to the expansion of the logging industry in our native forests. All our publicly owned state native forests must be taken out of the reach of the timber industry if there is to be any chance that we can rehabilitate and save our previously logged forests from dieback, and save our unique local wildlife and our iconic koalas from extinction. In my opinion, the combination of the draft Coastal IFOA in conjunction with the transfer of responsibility for native forests from the Department of the Environment and Heritage to the Department of Primary Industry will prove a disaster for our forests, our koalas and other threatened species. The Government not content with eroding essential environmental protection measures, now proposes to put the wolf in charge of the sheep, the fox in charge of the henhouse, cynically trying to convince the public that we can trust the future of our forests to be managed purely as a source of revenue, rather than as a vibrant living ecosystem. Forests should be farmed not plundered. We challenge you come to the Richmond Ranges and we will show you the damage reeked by years of logging, even with the current protections in place. We have no confidence in the outcome should they be removed. We need stronger regulations to protect our forests, not weaker. I, and most in this community, remain unconvinced by these false assurances. We are extremely concerned. It does seem to be an extremely unwise time to deplete and endanger our forests when we already have such obvious signs of climate destabilisation. Forests are such an invaluable source of carbon capture and lets not forget our commitments to the Paris Climate Agreement. Another high risk consideration is both the State & Federal elections coming up very soon. I strongly oppose the draft Coastal IFOA.

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
