

Dear Sir or Madam,

In response to the *Remake of the Coastal Integrated Forestry Operations Approvals Discussion Paper, February 2014*, I would like to raise specific concerns for consideration by the EPA and/or other relevant bodies when developing the draft for the new IFOAs:

1. The most beneficial change that the new IFOAs will allegedly bring is implementing an outcome based *modus operandi* in place of a detailed and prescriptive one. I see several shortcomings in this model, which I would like the EPA to address specifically, namely:
  - a. I have serious concerns about the **open interpretability of “broadly stated principles” and “guidance materials”** and how they can be misused and abused, since I do not trust that environmental outcomes are going to share the same status as timber extraction outcomes. Consider, as an example, the expenditure of \$1.7 million in a period of 16 years [around \$106,000 per year] that was described as *“of significant cost an effort”* as a result of conducting surveys to protect threatened species. In my opinion, this fact highlights that priorities are set on maximizing profit (as all companies, private or public, sadly do). Consider, too, that one of the main objectives of the remake is *“to reduce the costs of implementation and compliance”*, with the only cost reduction strategies mentioned in the whole document being related to environmental outcomes.
  - b. Following point a), a landscape focused approach to protect threatened species is another way of **loosening environmental outcomes and prioritizing extraction**. The document labels surveys as *“inefficient and ineffective”*. It is hardly surprising, when traverse survey requirements in the current IFOAs can be hardly regarded as adequate, being carried out *“at a rate of four person hours for every 200 hectares”*. I believe it would be much more beneficial to increase the expenditure on surveys rather than wipe them out altogether, since they are not inefficient or ineffective, but deficient in quality and quantity. The landscape approach simply protects what was already protected by the old IFOAs, removing the surveys as a cost reduction measure to maximize profit, ignoring environmental degradation and damage in the process.

The paper also describes the worst case scenarios in terms of survey efficiency: I would like a more objective and cross sectional analysis in order to make my own assessment.

The document states that an expert panel will *“review the list of threated species and assess which species are likely to be adequately protected by the new landscape provisions”*. My question is: how will they do that in the absence of data collected prior to intervention?

2. Regarding the **bell miner associated die back (BMAD)**, I would like to quote: *“Due to the complex interaction between factors that have been altered as a consequence of landscape-level disturbance, there is at present no obvious means of arresting the threat presented by BMAD”*. When will we, as a society, realize that there is no one cause-one effect? I would like to hope that we have moved from a Newtonian way of understanding the universe to at least catching a glimpse of the meaning of systems organization: a complex web of a myriad of interrelations which affect one another in unexpected ways. When you cut the trees and burn to a sufficient extent, you have altered the system, which responds concomitantly. Nature is beyond human control and the answer does not lie in finding new measures to fix complex problems with simple solutions. Perhaps it would be wise to cut fewer trees?

But this culture of unsustainable and perpetual economic growth is relentlessly taking us to consume more, not less, now making the so far inaccessible, accessible: trialling steep slope harvesting.

3. Although it is stated that “*a system of accountability for contractors may be of benefit*”, I would like some more concrete information on how the EPA is simply not **passing on their accountability for damaging practices** when they do happen to smaller scale contractors.
4. Regarding **the Internet as a source of information associated with the IFOAs** to be made publicly available, I believe that it is beneficial to *add* the Internet to existing channels, *not replace* them. Having hard copies printed and placing advertisements in newspapers do not pose a great expenditure or vast amounts of work, and considering that these are matters of great importance to the public and that sections of the population remain not internet savvy or wish to be free from this technology, it is important to include them.

Considering all of the abovementioned, and the fact that the new IFOAs will be issued in accordance with the Forestry Act 2012, which is already heavily in favour of maximising profit in front of habitat and species protection, I regard the remake as extremely detrimental for the health of the natural ecosystems contained within the areas covered by the IFOAs, and I urge the government to not pass this remake, drafting a new one more encompassing to environmental values.

I would really appreciate being notified by email of the release of the draft when it is placed for public exhibition.

Thank you very much for your attention.

Yours faithfully,

Maria Jose Lopez Alvarez