

21 June 2018

Ms Karen Gleeson

Senior Investigation Officer, Public Administration Division, NSW Ombudsman's Office.

kgleeson@ombo.nsw.gov.au

Dear Karen,

Re: Your reference: C/2018/1094

COASTAL INTEGRATED FORESTRY OPERATIONS APPROVALS (IFOAs)

As per our complaint re the public feedback process on the Regional Forest Agreements, I have now set out reasons why the IFOAs public feedback process denies a meaningful opportunity for effecting change; and, how the proposed IFOAs spell further destruction for Australia's natural environment, in perpetuity.

Yours sincerely,



Dr Bronte Somerset

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Founder: Great Southern Forest | <http://www.greatsouthernforest.org.au>

Member: National Parks Association Far South Coast Branch



Thanks to Peter Day, Sean Burke, Walter Jehne, Kim Taysom, Dr Oisin Sweeney, and Harriett Swift, whose comments have contributed to this complaint.

We acknowledge the Traditional Owners of the land to which these issues relate and pay our respect to the Elders past and present.

‘A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.’¹

1. PURPOSE OF COMPLAINT	3
1.1 THE PRECAUTIONARY PRINCIPLE	3
1.2 NO EQUITABLE JUSTICE IN THE GOVERNMENT’S DECISION RE THE IFOAS.....	4
1.3 CULTURALLY NEGLECTFUL.....	6
2. FEEDBACK FROM ONE INFORMATION SESSION	6
2.1 THE PROBLEM OF CLAIMING SUSTAINABILITY YET RUNNING OUT OF TREES	6
2.2 WHY TRUST ONGOING FAILURE?	8
3. ISSUES ARISING UNDER THE NEW COASTAL IFOAS:	8
3.1 INCONGRUOUS STATEMENTS IN THE IFOA INFORMATION SHEETS.....	8
3.2 MINIMISING WHAT?	10
3.3 NEW COASTAL IFOAS IN A NUTSHELL	11
4. SOLUTIONS	12
4.1 THE GREAT SOUTHERN FOREST PROPOSAL	12
5. RECOMMENDATIONS	13
APPENDICES	14
APPENDIX 1: AUSTRALIA’S RFA REGIONS	14
APPENDIX 2: MAP OF GRADED INTENSITY OF LOGGING.....	14
APPENDIX 3: COMMENT ON IFOA FLYERS	15
APPENDIX 4: FLYER ON TOMORROW’S FORESTS TODAY	16

1. PURPOSE OF COMPLAINT

Based on recent events, this letter adds content to our complaint to the NSW Ombudsman's Office about the lack of adherence to principles of procedural justice in the public feedback process for renewal of the Regional Forest Agreements (see RFA list Appendix 1).

Following on from the RFA public feedback, I present issues regarding how the new Coastal IFOAs are being enforced and thus with no equitable justice afforded to the public's State native forests. This enforcement exposes the lengths to which government departments will go to substantiate and justify indefensible acts against the natural environment.

Although connected to my previous correspondence, this complaint goes beyond failure to comply with principles of procedural justice. It cuts to the very heart of this country, to the destruction of the fabric of its natural environment and demonstrates the cavalier attitude the industry and the governments take towards archaic and destructive practices which are earmarked to continue into perpetuity and which other countries such as New Zealand and Sweden ceased generations ago.

1.1 THE PRECAUTIONARY PRINCIPLE

Environmental law regularly operates in areas complicated by levels of scientific uncertainty. In the case of many activities that entail some change to the environment, it may be impossible to determine precisely what effects the activity will have on the quality of the environment or on human health. It is generally difficult to quantify or qualify the impact of decades of logging native forests. For example:

- how much damage can be attributed to loss of species?
- how much soil has run downstream?
- how great is the impact on water quality and downstream fish populations?
- how much carbon has not been sequestered from tree removal?
- how much oxygen has been lost from tree removal?
- how many fires can be attributed to the loss of canopy drying out the forest floor?
- how have Traditional Owners been affected by having their sacred land desecrated?
- how much beauty has been lost simply to export woodchips (in south east NSW); historically at a financial loss to tourism and taxpayers?

There is no doubt that disturbance to environmentally sensitive areas will significantly disturb native wildlife. There is no doubt that the industry buried wombats alive in Glenbog State Forest. There is no doubt that the industry commenced logging on sacred Aboriginal land on the Biamanga Range. There is no doubt that mistakes are made such as when Gnupa State Forest was clear felled. There is no doubt that rivers in south east NSW have silted up and struggle to run. There is no doubt that rocky outcrops have been logged. There is no doubt that timber waste has been pushed up against remaining trees and subjected to post logging burns. We have seen all of this. We have witnessed and photographed that native forest logging can cause this much damage and we have good reason to believe that these types of breaches will continue under the proposed Coastal IFOAs.

The precautionary principle requires that, if there is a strong suspicion that a certain activity may have environmentally harmful consequences, it is better to control that activity now rather than to wait for incontrovertible scientific evidence. This principle is expressed in the Rio Declaration, which stipulates that, where there are: “threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”² The science exists, the studies have been peer reviewed and published in scientific journals; but the industry, and the Ministers who are in power, fail to give it credit.

Forest Corporation is guilty of having committed logging breaches for decades. Forest Corporation should no longer be exempt from the liabilities borne by perpetrators under the ‘polluter pays’ principle to which other industries are subject under Australian law. Bonds and insurance are a lawful provision. To assure the industry’s compliance with the precautionary principle, it must meet liabilities and externalities through bonds or insurance.

It is our request that the NSW Ombudsman’s Office act as a referee to facilitate a bond from the industry to ensure compliance with environmental protection. If the industry will not pay a bond of, say, \$10 million to the Government, then it should stop its operations. The costs not previously accounted for in the above list of items under the precautionary principle must now be recognised by the State which is quite aware of these consequences but have failed to act.

1.2 NO EQUITABLE JUSTICE IN THE GOVERNMENT’S DECISION RE THE IFOAS

Justice is important, not only to those directly affected by a decision, but also to those indirectly affected or onlookers. Procedural justice and interactional justice are important in determining the acceptance of outcomes because they deliver things to which people feel they are entitled, such as respect, information and recognition of their right to be involved in a decision-making process.³ The Governments’ decision-making processes are based on the premise that native forests deserve no justice and are, therefore, vulnerable to mismanagement.

By special invitation, the Environment Protection Authority has held information sessions regarding the ‘logging rules’ for native forests, known as the Integrated Forestry Operations Approvals (IFOAs) which follow on from the Federal Government already having approved the Regional Forest Agreements. But what real justice these sessions afford the public, and their opinions about natural justice for native forests, is not apparent.

Despite the fact that the outcome of the public feedback process is not yet known^A, the EPA has formed the IFOAs which are the rules whereby logging in our State’s native forests can be undertaken. (These Approvals do not relate to plantation timber logging.) It seems as if the Governments have put the ‘horse before the cart’ by assuming that public feedback for the RFAs favoured their renewal. The DPI told me personally that data from the RFA feedback process shows that at least 80% of the public opposed further logging of native forests and that ‘...they are treating the southern forests like abattoirs’.

^A At the time of writing, the DPI’s Report on public opinion of the history and future of the Regional Forest Agreements was due.

The Environment Defenders Office published on 15 June 2018: “Curiously, the NSW Minister for Lands and Forestry recently reported to the Parliament that ‘...we have finalised the implementation review of the [NSW] Regional Forest Agreements and we are commencing their renewal process’.⁴ If this is true, the Government should release the independent reviewer’s report immediately.”⁵ This demonstrates an undemocratic assumption at least, and a blatant disregard for public opinion in whatever way it is evaluated and reported.

Conservation groups around the State have not attended the recent IFOA sessions because the outcome is a forgone conclusion with the new laws clearing the legal decks for the industry to ‘go for broke’ while there are still some trees remaining. For decades this south east region of NSW has endured the most intensive logging in the State to supply the Eden chipmill, yet the mill employs only 37 people.

The changes to the IFOAs are a result of the need to meet the Government’s stated ‘dual commitment’ to no reduction in wood supply and no erosion of environmental values⁶, and to reduce costs. The Natural Resources Commission (NRC) report that accompanied the proposals stated:

...following analysis of the expected cumulative impact of the agreed and recommended settings, the Commission has determined that it is not possible to meet the Government’s commitments around both environmental values and wood supply. In addition, a range of external factors outside of the IFOA settings affect the ability to meet the commitments both now and into the future, such as emerging threats from climate change and changing fire regimes.⁷

The Government asked the NRC to ‘make it work’. The outcome was decided, was presented at information sessions and has been published on the Internet. So, the IFOAs are a *fait accompli* and the information sessions conveniently tick the EPA’s ‘consultation – yes’ box.

The NRC has a web page asking the public for opinions on the IFOAs. To answer these questions authoritatively would require months of reviewing the information on the accompanying documents. The basic draft alone contains over 55,000 words.⁸

Concepts of justice and the distribution of public resources have been an important aspect of social debate for centuries. Finding fair and just allocations of natural resources remains a major preoccupation for national governments and their constituent communities. Yet Australian governments, despite their long history of dealing with resource use conflicts, have largely failed to establish lasting legal or institutional frameworks in which resources are allocated in ways that are seen as equitable, fair and just.⁹

These ‘approvals’ go against our social and environmental conscience and recognise that the damage to our precious natural environment is, has been, yet should not continue to be, a disgrace to the nation of Australia. These forests belong to the people of NSW and it is no longer wise or intelligent to pursue extractive practices in light of the demise of our unique native species, the critical need to protect natural carbon stores, and recognition of the need for intergenerational equity.

1.3 CULTURALLY NEGLECTFUL

On a final note regarding lack of interactional justice and equity; this screen shot of a word search says a thousand more words spanning thousands of millennia. In 194 pages (over 55,000 words) of the draft consultation—there is not one mention of the words ‘Indigenous’, ‘traditional owners’, ‘Aboriginal’, ‘first nations’, ‘culture’, or ‘heritage’.

The misnomer ‘Heritage’, as in ‘The Office of Environment and Heritage’, is mentioned 11 times. Ignoring the impact of State Forest logging upon the culture and heritage of the Traditional Owners is further evidence that these IFOAs were created without any respect or consideration shown to the Yuin Nations’ people, whose ancestors have lived in SE NSW for over 6,000 years.¹⁰



Outcomes that are perceived to be unfair can result in protests, damaged relationships and divided communities particularly when decisions are made which benefit some sections of the community at the perceived expense of others.¹¹

2. FEEDBACK FROM ONE INFORMATION SESSION

A colleague attended EPA’s entire session held at Narooma on 7th June 2018. He has witnessed logging of native forests on his home turf near the Tantawangalo State Forest. He stated that the presentation went for quite a few hours and in an emotionally charged environment. There was a lot of information to absorb at the consultation and the handouts were inadequate.

Personal opinion of colleagues is represented in italics.

2.1 THE PROBLEM OF CLAIMING SUSTAINABILITY YET RUNING OUT OF TREES

It would seem that Forestry Corp were complaining that they could not meet their timber supply contracts, so the Government asked the EPA and Forestry Corp to come to an amicable agreement on how to increase the supply of available trees. They couldn’t, so the Government called in the Natural Resource Commission (NRC) to find a solution. The options they offered

the Government were: buy back the wood supply contracts, log National Parks, log monoculture plantations that are now part of National Parks, or re-classify old growth and rainforest areas in State Forests and let the loggers in. The latter option was adopted by Government. Reclassification of old growth forests so the loggers can cut down those trees.

I was surprised to hear Bryce Wilde, Executive Director of the NRC, admit that the State had run out of trees in State Forests to log! Apparently, the reason why the State Forests have run out of trees is because there are too many koalas, i.e. the creation of new protected areas in northern NSW for threatened ecological communities, and not because of unsustainable logging practices.

Thus, the flag-bearing tenet of the Forest industry, 'sustainable forest harvesting', has proven to be false by their own admission that they need more timber and, as these new IFOAs permit, intend to log rainforest timber, and old growth forests. The IFOAs sanction logging to occur not 100 metres, not 50 metres nor even 10 metres, but 5 metres from the edge of streams and waterways.

In addition, Forestry Corp has been pushing for years to remove environmental laws that hinder their logging operations so they can take more trees and trees in areas of the forest that were protected from logging. Examples given were, reducing the size of logging exclusion zones in and around sensitive habitat features, like streams and rocky outcrops. Increasing the area of forest that can be logged in a single operation, increasing the intensity of logging operations and increasing the frequency of logging operations in any given forest.

Once the old growth forests are cleared, where will Forestry Corp get its future trees from? They claim in implementing the new system, that forests will be managed better. That this time, they will be sustainable and available for future generations. The proposed system will allow 10% of a forest to be logged (heavily) each year. So, in 10 years, the forest will all contain trees under 10 years old! There will be 5% of the forest area left for fauna to use and an additional 5% of the logged area left for fauna - so a total of 10% of a forest will remain, the heavily logged areas will contain a sporadic sprinkling of old trees with 140cm circumference or more and a handful of habitat trees - trees that will most likely be damaged during the logging operation.

This is entirely unacceptable and there could not be a better way to disrupt forest communities of species from top order mammalian and avian species right through to fungi and bacteria. Any retained tree, whether it is called a 'habitat' tree or a 'retained' tree, is not protected by surrounding camouflage and, by their visibility, attracts predators rather than protecting hollow dwelling or any other tree-dwelling species.

Michael Hood, Director of Forestry NSW EPA, and a Forestry Corp NSW representative, spoke of the urgent need to 'update' the State's logging laws. The current laws, as bad as they are, at least recognise the different forest ecosystems that occur throughout NSW and the level of the ability of these ecosystems to regenerate after logging. The proposed changes assume trees growing 1km above sea level in almost sub alpine conditions where the soils are basically gravel and contain little nutrients, where it regularly drops below 0° and it snows, will grow back as quickly as a forest in sunny Bermagui with its rich soils.

2.2 WHY TRUST ONGOING FAILURE?

“Forestry Corp’s Hardwood native forest division, for the last few years made a profit”. Forestry Corp NSW representative.

FCNSW annual reports show heavy operating losses for the last decade. Only the 2016-17 annual report shows a small operating profit of \$3.8m and only after a \$2m one off payment from NSW Roads & Maritime Services and a \$17m state grant.

Between 2009 and 2014 the Softwood Plantations Division of Forestry Corporation (formerly ForestsNSW) cross-subsidised native forestry logging to the order of \$79 million.¹² Average losses in other recent years have been \$11 million per year.¹³

It is clear that these changes are not about protecting the environment, they are about giving Forestry Corp access to more trees. Trees that will mostly be chipped and sent to China. Unsurprisingly there is no mention of a tree shortage on the NSW Government’s propaganda site - but lots about a win win for the environment!

It is quite clear that attempts at environmental protections of the past in State Forests have failed as they depended upon wildlife not crossing the boundaries of so called ‘protection zones’. The provisions of the Environmental Protection and Biodiversity Conservation Act (EPBC), which apply in National Parks, do not apply in State Forests. This leaves species within State Forests vulnerable to having their habitat destroyed, and as long as native forest logging is allowed to continue, no species is safe.

The history of over 4,000 recorded, yet mostly unchallenged, breaches in south east NSW gives no confidence in any government’s capacity to manage native forest logging in a way which will meet the needs of timber supply and environmental protection. From 2004 – 2014, 2814 logging operations have been conducted, only 187 audits have been carried out, and over 4,000 non-compliance breaches were committed. The only breaches data which the Environment Protection Authority received for the Southern and Eden RFA regions over these years was submitted by volunteer local forest experts.

I have spent the last 18 months providing data, providing affidavits and having meetings with EPA investigators about breaches in the Tantawangalo forest where I live.

Given past promises and past history we have witnessed that native forest logging and environmental protection will never be able to co-exist.

3. ISSUES ARISING UNDER THE NEW COASTAL IFOAS:

3.1 INCONGRUOUS STATEMENTS IN THE IFOA INFORMATION SHEETS

The content of the new IFOA flyers is ambiguous and often not based on fact. The attached flyer regarding “Tomorrow’s Forests Today” is worth analysing in depth as an example. (Please see Appendix 2 for comment on the other flyers.)

C. Tomorrow’s Forests Today

“A state forest’s purpose is to provide timber, they are not multipurpose forests; they are timber production forests”. Bryce Wilde, Executive Director NSW Natural Resources Commission.

This is incorrect as the RFAs state: “The RFAs seek to balance competing economic, social and environmental demands on forests by setting obligations and commitments for forest management that deliver:

1. certainty of resource access and supply to industry – building investment confidence
2. ecologically sustainable forest management – ensuring forests are appropriately managed and regenerated
3. an expanded and permanent forest conservation estate – to provide for the protection of Australia’s unique forest biodiversity.”¹⁴

The image on the front of the flyer does not represent the true purpose of State forests. It shows a woman dressed for forest track walking, followed by a forest worker, another woman holding a camera and lastly a mountain bike rider. This gives the impression that the forests are used for personal activities such as bushwalking, photography and bike riding, when in reality this is not the case. According to a statement contained on the back of this flyer, there is a statement claiming that State forests are “native timber production forests” and the new IFOA will allow up to 90% of the forest to be used exclusively for timber extraction. Distrust is warranted from this situation.

Questioning the logic of changing the current IFOAs. The flyer states that integrating four existing IFOAs with over 2000 conditions into one comprehensive license, will “improve clarity, transparency and enforceability”. The flyer states this without giving even the simplest explanation on how this will be achieved and then makes the claim “it will provide a better outcome for the environment and timber production”. All of the conditions in the current IFOAs are there because the EPA needed to protect the environment. If existing conditions were not clear, they could be re-worded and, if they were not enforceable, how would removing them create a better outcome for the environment? The claim that the new conditions will be ‘transparent’ is incorrect.

The flyer vaguely talks about new GPS technology being used by workers and new technology to map more streams, yet this new technology would be used regardless of the introduction of new IFOAs and its introduction is not reliant on changing the IFOAs.

A statement in the flyer claims that the new IFOA “will maintain multi-aged forest across the landscape”. This is extremely misleading and should read “will maintain multi-aged forest across 10% of the landscape”.

The pamphlet states that “the forests are an important resource for materials in everyday life, like hardwood timber for high end construction, furniture, fences and floors”. The construction industry depends more on concrete, concrete slabs, concrete bricks, steel, bamboo flooring, ceramic and clay tiles, plantation pine and manufactured timber than upon timber. Not stated in the pamphlet is that 90% of timber logged in southeast NSW is exported as wood chips or that native forests are being logged for firewood.

3.2 MINIMISING WHAT?

The 58 instances of the term 'minimise' in the draft protocols could lull a reader into a false sense of security. Throwing incendiaries to burn off native forest undergrowth to allow access for logging machinery, killing wildlife, felling and removing trees from the site, then post logging burning, do not bring the term 'minimal' to mind as the photo below shows.



Figure 1. Gnupa State Forest – an industrial mistake.

Herewith are a few examples of the misuse of the term 'minimal':

1. ...to minimise any adverse impacts...on the environment
2. ...to minimise the impacts of proposed mixed intensity harvesting operations over time and across the landscape
3. ...in a manner that minimises disturbance to the bed and banks of the drainage feature and maintains fish passage
4. ...to minimise soil disturbance
5. ...surveyor must minimise exposure of noise and light to any bats inhabiting the site

Also mentioned in this flyer:

1. A potential future hollow-bearing tree is described as "A living tree that is of mature or late mature growth stage which has potential for developing hollows, good crown development, minimal butt damage and is not suppressed".

By this definition, all those trees which don't meet this definition will most likely never have the opportunity to do so.

2. ...a minimum of three independent and suitably qualified scientists that have demonstrated...

A scientist who is 'independent' from what or whom one may ask. One whose research findings have found that native forest logging is not detrimental to the environment would be hard to find. All scientists are suitably qualified by the nature of their profession, so what constitutes an 'unsuitably qualified scientist'? The Governments would do well to review studies by eminent scientists such as: Keith, Mackey and Lindenmayer¹⁵, Mackay¹⁶; Perkins and McIntosh¹⁷; Lindenmayer, Blair and McBurney¹⁸; Sweeney¹⁹; and, Makkonen, Huttunena, Primmera, Repog, and Hildéna²⁰.

3.3 NEW COASTAL IFOAS IN A NUTSHELL

Under the new Coastal IFOAs, native forest logging:

- will be more intense
- will occur in previously protected rain forest and old growth forests
- will convert multi-species forests into monoculture plantation type forests
- will occur up to 5 meters from riparian areas
- will create a mono-species forest scape
- will make forests more fire prone from dryness caused by canopy removal
- will act against climate mitigation and carbon sequestration
- will damage more iconic species' habitat
- will worsen Australia's reputation as having world's worst mammalian extinction rate
- will support ongoing community discontent
- will ignore intergenerational equity

For decades the southern region has endured of the most intensive logging in the state to supply the Eden chipmill. The new draft IFOAs implicitly acknowledge that the far south coast logging will remain the worst in the state. Other regions will catch up a little, but ours will still be the winner in the race to the bottom. This 'new' integrated proposal spreads the destructive and illogical practices from the south to the north coast and makes them so much worse by taking out some of the already weak protections that existed previously.

Millions of pelts were exported from the south east region to the US and the UK (ceased in 1927 by order of the US Hoover Government), but the south east region's forests remain amenable to the koalas now and, even more so, given the influences of a changing climate; and the opportunity for future refugia. Pressures from more intense native forest logging spells nature fighting a losing battle.

The EPA is established to protect our environment, yet it clearly appears to be aligned with this Government in sacrificing our precious environmental values to fill the over-committed wood supply agreements negotiated by NSW Forestry Corporation, against the public good and the public interest.

The worst thing our Government has done with both the RFA and IFOA proposals is to totally throw out any semblance of Ecologically Sustainable Forest Management. The NSW Forestry

Corporation and our Governments have never been properly brought to account for the destruction of our forests. By prioritising timber extraction over environmental protection, the new IFOA abandons the commitments NSW made under the National Forest Policy Statement in 1992, including the concept of Ecologically Sustainable Forest Management. This is a fundamental shift in forest management, occurring with insufficient consultation or application of the findings of studies by ANU research scientists.

4. SOLUTIONS

Governments should now be looking at fair and responsible ways to wind up the industry. They should stop deluding themselves and the public that our forests are a magic pudding that can keep on producing woodchips indefinitely and pretend that environmental values are being protected. By ceasing the logging of native forests, jobs for people within the industry can be transitioned into management of forests for restorative activities based on adaptive, mitigative strategies.

Prof David Lindenmayer, from the ANU's Fenner school is the most high-profile scientist arguing the case against native forest logging. He stated:

I'm saddened that people don't want to see what the science is saying. The reality is that those forests are under significant stress, in danger of ecosystem collapse. That's what the science is showing and I'm afraid if some people don't like the science, that's their problem.

It's nonsensical to have a forest policy with agreements that are based on hopelessly out-of-date information. It's like having a media policy without considering the internet.

We've had 20 years of solid research which shows the other values of native forests – for climate change mitigation, for water production, for tourism, for better managing fire. There's an enormous amount of new information that actually needs to be considered before you simply roll over an RFA. ²¹

4.1 THE GREAT SOUTHERN FOREST PROPOSAL

Five years ago, a proposal was formed and promoted for the future of the south east's native forests. It includes knowledge and local understanding based on empirical and scientific evidence, from environmental and wildlife experts and community opinion. The principles presented in the Great Southern Forest's Brief have been endorsed by over 40 conservation organisations including the National Parks Association Far South Coast branch (which endorses this complaint), the South East Region Conservation Alliance Inc., the Nature Conservation Council, the National Trust and the Wilderness Society. The Great Southern Forest proposal recognises that:

1. forests are vital for climate stabilisation of the planet;
2. existing mature plantations can meet Australia's timber needs;
3. while the Regional Forest Agreement process provides a timely window of attention on native forests, its assumptions and outcomes are clearly outdated in the light of scientific evidence and the recognised importance of forests on climate and water cycles;

4. the present system of management of native forests of SE NSW for timber extraction has overseen large environmental, economic, social and employment losses with inestimable damage to soil, water, biodiversity, wildlife, habitat and canopy thus drying out the forests.

The Great Southern Forest Proposal recommends that the Governments:

- Implement a timely re-orientation of management of public native forests in SE NSW from timber extraction to ecological integrity, climate stabilisation, water security and carbon sequestration;
- Cease logging and woodchipping in SE NSW state native forests;
- Enact the full transition to plantations for wood supply;
- Terminate the Eden and Southern Regional Forest Agreements, reinstate full Commonwealth environmental protection and pilot this new model of forest management in SE NSW;
- Ensure implementation of a Just Transitions program for SE NSW timber workers;
- Extend Indigenous partnership in management and employment; and
- Prioritise forest preservation and restoration in the 432,575ha of SE public native State forests.

The Great Southern Forest proposal has been presented to the DPI and the EPA and to many other Government Federal and State Ministers, local Government agencies, the general public and conservation organisations. This proposal represents the will of the people. Despite acclaim from all to whom the GSF proposal has been presented, we have little evidence supporting that this proposal has been given credit by those in power to make a difference.

5. RECOMMENDATIONS

We acknowledge the seriousness of this complaint, yet in view of the current situation where decisions are being made which will affect our native forests in perpetuity; we request that, respectfully, the NSW Ombudsman's Office intervene.

Hence, we suggest these recommendations:

1. That the NSW Ombudsman's Office act as a referee to facilitate a bond from the industry to insure against environmental degradation under the precautionary principle.
2. That Forest Corporation pay a deposit of \$10 million to insure against logging breaches and the 'minimal disturbance' often claimed as their intention in the draft IFOA document.

And/or:

1. That the State Government buy back the wood supply contracts (as originally suggested by the Natural Resource Commission) and that the industry's workers be transitioned into jobs in plantations and native forest restoration and protection.
2. That principles of procedural justice be applied to a clean public YES/NO vote on native forest logging.

Thank you for reading this preliminary evidence behind this complaint. Discussion with fellow conservationists from south east NSW could be arranged, and please email or phone if you have any queries. bj Somerset@gmail.com, 0487635539.

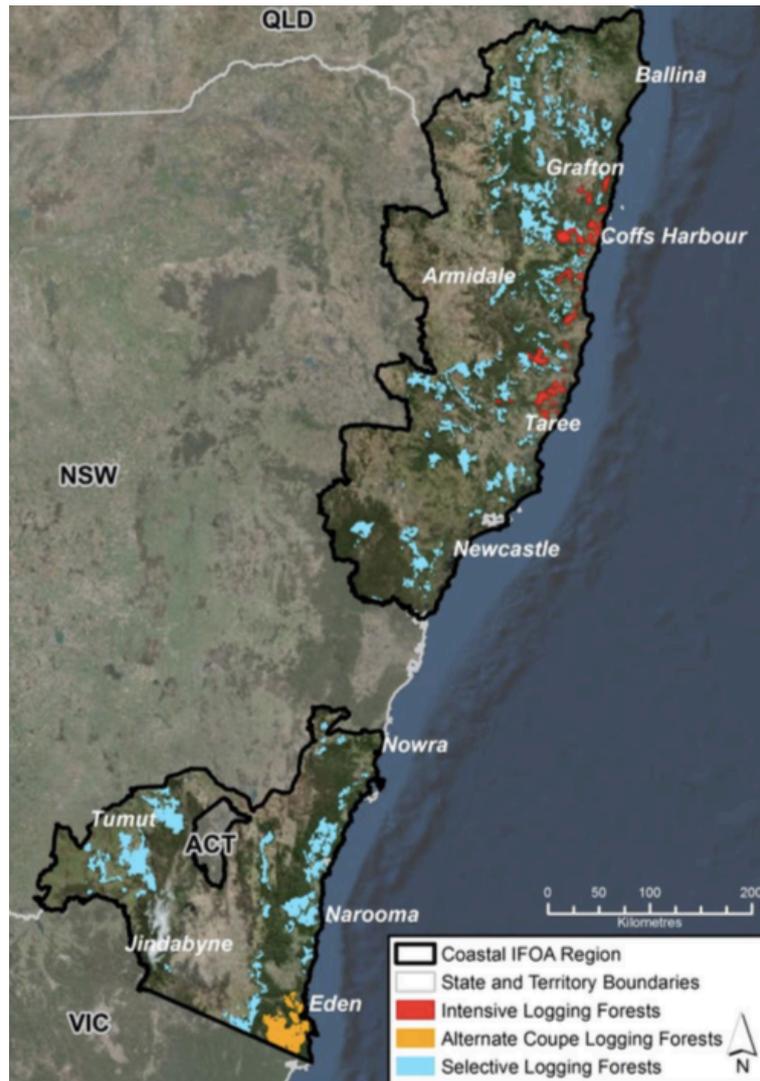
APPENDICES

APPENDIX 1: AUSTRALIA'S RFA REGIONS

New South Wales - Eden (signed 26 August 1999)	205,544 ha
New South Wales - North East (signed 31 March 2000)	470,867 ha
New South Wales - Southern (signed 24 April 2001)	483,118 ha
TOTAL VULNERABLE HECTARES FOR NSW:	1,159,529 ha
Tasmania (signed 8 November 1997)	
Victoria - Central Highlands (signed 27 March 1998)	
Victoria East Gippsland (signed 3 February 1997)	
Victoria Gippsland (signed 31 March 2000)	
Victoria - North East (signed 23 August 1999)	
Victoria - West (signed 31 March 2000)	
Western Australia (signed 4 May 1999)	

APPENDIX 2: MAP OF GRADED INTENSITY OF LOGGING

This map does not show future logging areas, not those already logged.



APPENDIX 3: COMMENT ON IFOA FLYERS

A. Multi scale approach factsheet

“The multi-scale approach in the proposed Coastal IFOA delivers a comprehensive threatened species protection model for the coastal timber production forests of NSW. It provides important habitat resources at the site, local and broad landscape scales. Stronger protections are applied as you work down the scales. This multi-scale approach also ensures the maintenance of multi-aged forest across the landscape and the retention of undisturbed habitat. This will provide areas of refuge, as well as connectivity and dispersal opportunities for native species.”²²

- Management Zone Scale: On average 50% of the management zone of state forests is protected.
- Local Landscape Area Scale: On average 50% of the management zone of state forests is protected.

- Site: An average of 41% of State Forests at a site scale will be protected, increasing to 45% with added tree retention clumps.
- Environmental protections: A maximum of 10% of a management area can be harvested per year.

I never was really good at maths, but this all equals 151% of what, where?

B. Wildlife factsheet

“The proposed Coastal IFOA will provide permanent protections for native plants, animals and their habitat, across the forest landscape, with targeted protections at harvesting sites.” **YET:**

- The proposed Coastal IFOA will set minimum requirements for the permanent protection of threatened species habitats in forests where harvesting activities are carried out.
- ...at least 5% of the landscape must be permanently protected in wildlife habitat clumps prior to harvesting.

“Under the proposed Coastal IFOA, all giant trees will be permanently protected from harvesting.” **YET:**

- A minimum of five hollow-bearing trees must be permanently retained per hectare, where they exist.

This factsheet is beyond farce. We are told that giant hollow bearing trees greater than 140 cm in diameter are “very rare features in the landscape” and yet we are told that the threshold for retention of blackbutt is to be increased to a 160cm diameter. No reason is given. Illogical. It would also be helpful to know why large trees are very rare features in the landscape.

D. Landscapes factsheet

This fact sheet gives no indication of the decision, that for most streams, the protection buffer will be reduced from 10m to 5m. The comment that “...areas of old growth will continue to be protected” is meaningless without examining such a statement in its proper context.

E. Technology and Boundary Rules factsheet

This fact sheet is meaningless.

F. Timber factsheet

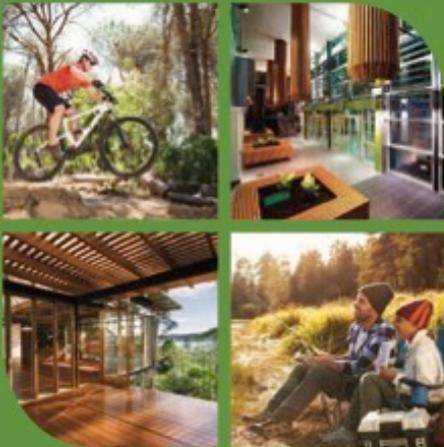
This fact sheet is an example of deliberate distortion. It is claimed that the reason for the more intensive logging planned for the area between Taree and Grafton is “...to improve regenerative outcomes”. There is no mention of the desire to achieve greater timber volumes. The arrogance of this approach assumes that the reader is of extremely limited intelligence.

THE COASTAL IFOA

Our native timber production forests complement our world-class system of conservation reserves.

They provide important habitat for native fauna and flora and offer unique recreational opportunities, with over 3 million people visiting them each year. They're also an important resource for materials in everyday life, like hardwood timber for high-end construction, furniture, fences and floors.

The NSW Government is committed to developing an IFOA that balances environmental outcomes and timber production.



If you use our coastal forests, the timber they supply, or care about the habitat they support, it's time to have your say on tomorrow's forests... today.

Visit
engage.environment.nsw.gov.au/forests



Have your say

ON TOMORROW'S FORESTS TODAY



Do you use our coastal forests, the timber they supply, or care about the habitat they support?

IFOA
INTEGRATED FORESTRY OPERATIONS APPROVALS

A NEW APPROACH

The NSW Government is updating the rules for native timber harvesting in NSW's coastal forests. These rules, called the Integrated Forestry Operations Approvals, or IFOAs, have not been updated for almost 20 years. They have not kept up with regulatory best practice and they are no longer effective in managing environmental impacts, or responding to changes in operational practices and technology.

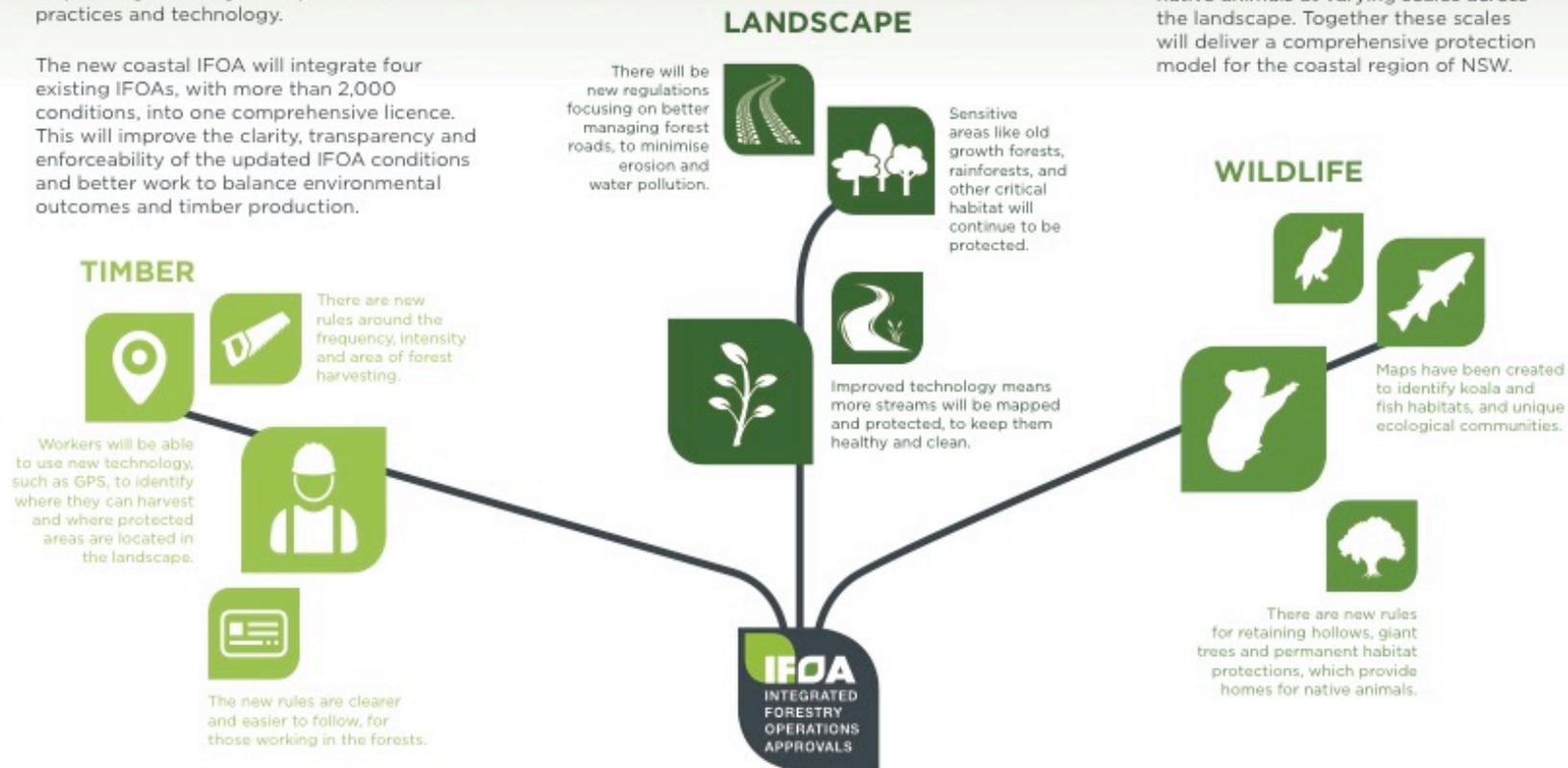
The new coastal IFOA will integrate four existing IFOAs, with more than 2,000 conditions, into one comprehensive licence. This will improve the clarity, transparency and enforceability of the updated IFOA conditions and better work to balance environmental outcomes and timber production.

The new coastal IFOA will be efficient, effective and enforceable. It will reflect modern best-practice regulation and reduce the costs of implementation and compliance, making it easier for industry to comply with forestry rules and for the EPA to regulate.

KEY IFOA INCLUSIONS

The new coastal IFOA will maintain multi-aged forest across the landscape and retain undisturbed habitat so that native species have areas of refuge, and can re-colonise areas after harvesting.

This 'multi-scale' approach will provide permanent habitat protections for native animals at varying scales across the landscape. Together these scales will deliver a comprehensive protection model for the coastal region of NSW.



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