Hunter Community Environment Centre.

Hunter Community Environment Centre Reply to: Jo Lynch 167 Parry Street, Hamilton East coordinator@hcec.org.au

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Via webform: https://engage.environment.nsw.gov.au/forests

Submission: Draft Coastal Integrated Forestry Operations Approval

Thank you for the opportunity to submit to this draft. The Hunter Community Environment Centre is a not-for-profit charitable organisation advocating for environmental protection in the Hunter region. We will be guided by the North East Forest Alliance in our response to the Government's proposals for the management of public forests in the North East.

We are very concerned that the proposed Draft Coastal IFOA dramatically weakens protection for habitat and other important conservation values in State Forests. This proposal will worsen the position of threatened species in our forests and risks losing forever irreplaceable areas of oldgrowth, rainforest and threatened species habitat.

We are also alarmed at the increasing intensity of logging operations, the use of clear-felling techniques, logging in threatened species habitat, rainforest and stream buffers.

The NSW Government has recklessly increased wood supply commitments despite reduced timber availability and contrary to previous findings and commitments about sustainable timber extraction. To open up oldgrowth and rainforest to meet these commitments is reprehensible and will be strongly opposed every step of the way.

Key recommendations and comments

- There must be no opening up of informal reserve and Special Management Zones including
 for oldgrowth, rainforest, rare forest types and owl landscapes. These special areas are part
 of a comprehensive, adequate and representative reserve system and must be maintained
 intact.
- The move to use revised criterial and methodology to remap oldgrowth and rainforest and make some of these protected areas available for logging is utterly unacceptable.
- We strongly oppose the creation of a 140,000ha North Coast Intensive Zone. Clearfelling is a highly destructive practice and must not be allowed in NSW forests.
- Thirty metre stream buffers in headwater catchments are crucial to maintaining water quality and catchment health, as well as providing riparian habitat for flora and fauna. We strongly oppose the proposal to reduce headwater buffers to 5 metres.
- A 10 metre riparian buffer must be implemented for all streams in the intensive logging zone catchments less than 20 hectares.

- Hollow-bearing tree retention is critical to threatened species and other wildlife survival. All
 hollow-bearing trees must be retained, and five recruitment trees per hectare from among
 the largest and healthiest trees. Recruitment and hollow-bearing trees must be recorded
 such that they are not at risk of being removed during later logging events.
- All trees with a diameter greater than 1 metre must be retained.
- The removal of the need to protect eucalypt feed trees is opposed. The requirement to
 protect sound and healthy mature/late mature individuals of the most important nectar
 producing eucalypt species must be restored and at least five of these trees protected per
 hectare.
- The need for pre-logging surveys for threatened species must be restored as must be the need to survey for and protect high quality Koala habitat.

Thank you for the opportunity to make this submission. We hope that the Government heeds the public outcry against these proposals and safeguards New South Wales' irreplaceable public forests, the catchments they feed and the species that rely on them.

Sincerely,
Johanna Lynch
Coordinator