Thank you for the opportunity to comment on the EPA's draft climate change policy and action plan. I have been involved in environmental organisations for nearly two decades, especially the South East Region Conservation Alliance and the Australian Forests and Climate Alliance.

My comments largely focus on the native forest and forestry sector, which gets scant attention in the two papers. .

The Environment Protection Authority's draft policy and draft action plan are so broad and non-specific and in many ways so non-controversial that they could mean anything or nothing. They largely accept the existing set of environmental policies and rules. They lack serious assessment of the impact of climate change on forest species and ecosystems that have already been degraded by decades of industrialised logging, despite claims of ecologically sustainable forest management. Without such a context, how can climate considerations be effectively incorporated and how can measures of progress be grounded?

The EPA is hamstrung by the currently inadequate climate policies of the NSW Government for the forest and forestry sectors; it can only work at the margins at best, and does not have the resources to ensure that even the inadequate IFOA/CIFOA forestry rules can be properly enforced.

For these reasons developing the EPA climate policy and action plan needs to come after, not before, the Government's own policies and plans for the sector are thoroughly upgraded. While good progress is being made to develop new policies in other sectors - especially in encouragement of renewable energy - very little comprehensive policy change is happening in regard to forests and forestry.

I am strongly of the view that fundamental forest and forestry policy change is urgently needed, based on acknowledgment of the poor and declining state of NSW forests, and the further problems from fires and floods and species losses and emerging trends in geographical shifts that climate change is bringing.

We do need to have new forest policies more firmly positioned as intrinsic to climate policies: Ecosystem stability is a vital element of climate stability. Respected climate scientists are warning of ecosystem breakdown. We have an extinction crisis as well as a climate crisis. Wood when burnt is more emissive of carbon dioxide than coal per unit of energy produced, but is treated as carbon neutral under perverted application of carbon accounting rules. Climate policies to date under-emphasise the relative importance of forests' potential roles vis-a-vis reducing fossil fuel emissions. Ending native forest logging would result in reduced carbon dioxide and other health damaging emissions, while drawing down more emissions from the atmosphere and building carbon stocks The comparative ease and speed and modest cost, and enhanced community benefits, with which new climate positive forests policies could be implemented is largely ignored. All these shortcomings are thus inevitably followed by shortcomings in the EPA papers.

Attached is a position paper from the South East Region Conservation Alliance prepared in June 2022 setting out for discussion changes in NSW forests and forestry policies. In particular, making Forestry Corporation responsible solely for plantations, and a new agency (including the National Parks and Wildlife Service) to manage State native forests, would be a positive step towards more genuinely sustainable forest and forestry management. Such an arrangement would make it possible to develop more specific and more effective measures of progress in meeting their respective objectives in relation to climate change.

The EPA papers emphasise the agency's concerns to keep up with - preferably keep ahead of - fast moving new policies and approaches as climate policies are developed. I hope it will

be able to take a more leading role in integrating climate and forest policies. How otherwise can it justify its being the Environment Protection Agency?

Heather Kenway