



# Coastwatchers

*Eurobodalla's voice for nature*

Peter Cochrane  
Chair  
NRC Forest Monitoring Steering Committee  
c/o Natural Resources Commission  
GPO Box 5341  
Sydney NSW 2001

29 November 2019

Cc: Margaret Blakers, Nick Hopkins, Sean Burke.

Dear Peter

Thank you for taking the time to visit three logging compartments on Monday 25 November with Patrick Baker and Peter Hairsine from the NRC Forest Monitoring Steering Committee and Todd Maher, Director Programs.

Attached are:

- The document provided on the day.
- Two questions asked that we didn't know the answers to and the yields from the harvest plan for the three compartments we visited.

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As discussed following is a summary of the points we covered.

**Early action** - the monitoring program should lead to early action to help build confidence. This could be through quick desktop/expert reviews specifically directed to assess:

- the impact of the north coast fires on species and ecosystems and consequently on wood supply
- listed threatened species where logging/silviculture is an acknowledged threat, including the Swift Parrot and the Koala

**Compliance** - the partial outsourcing of logging compliance monitoring to the community is unfair, unrecognised, unpaid, inefficient and ad hoc. It stems from a realisation in the community that the under resourcing and understaffing of the EPA results in untold minor and major breaches going unnoticed in every operation. It is also essential that timely "stop points" are set for times when critical threats or breaches are identified through monitoring or external circumstances.

**Neighbours - National Parks and Residents** - logging impacts on neighbouring land affecting national parks and residential property alike. There is no buffer, so thousands and thousands of

kilometres of national park and thousands of residents have their boundaries affected by neighbouring an industrial operation involving the removal of adjacent state forest. As upright live green forest is replaced by extensive areas featuring piles of dry tree tops and piles of bark on the forest floor. This increases fuel risk from lightning strike as well as post harvest burns escaping. Wildfires driven by winds from the north west would also place many coastal communities at risk from ember attack many kilometres ahead of the fire front. Exposed trees on neighbouring land are also subject to being blown over.

**Mosaic Burning** - burning whole valleys will only leave fire tolerant flora and very little fauna. Mosaic burning or traditional firestick cultural burning must be adopted to maintain biodiversity.

**Records on the Bionet expiring** - In Mogo 159 there were two square tailed kite nest records each triggering 100 metre radius exclusion zones. Under the new CIFOA, FCNSW ecologists no longer complete a 15 to 18 hr ecological survey per compartment. The bionet records that trigger exclusion zones throughout the 1 million ha of NSW state forest being logged, will systematically expire as some records only remain applicable for two to ten years.

**Retained trees** - as less large trees with hollows or that will form hollows, are kept, the forest species that need to breed in hollows will plummet. These include large forest owls, all cockatoos and many possums including greater gliders and yellow bellied gliders. The loss of hollow bearing trees, including due to logging, has been identified as a [key threatening process by NSW OEH](#).

**Outsourcing ecological responsibility to logging contractors** - logging contractors are driven by wood extraction goals and are not employed for ecological expertise. It is erroneous to expect logging contractors to look ahead for wildlife, including koalas. The drive to over-extract wood, due presumably by lack of profitability, is evident by community reports of contractors working under floodlights until 4am on Buckenbowra Road in the last two years. In the light of these fast extraction practices, how can logging contractors be expected to look for wildlife in the dark from their moving machinery, and would they retreat if they find wildlife when under such pressure to obtain wood?. Also FCNSW are not present most of the time to look for wildlife 100m of the operation, as the EPA has advised FCNSW only need be there 20% of the time, but may be there even less than that.

## Poorly maintained machinery and fire risk



Photos of oil blobs with GPS coordinates found in compartment 139 Mogo State Forest, shortly after the community was evacuated in the Dunns Creek fire, were reported to EPA at a community meeting. Logging stopped the day of the meeting in 2017 leaving 8 hectares unlogged to this day.

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Photo: Unregistered, not up to standard diesel cart used in Mogo State Forest Compartment 144 next to the tourist town in 2018. This photo taken in Buckenbowra State Forest compartment 517 in 2019.

**Koalas** - The Murrumbidgee Flora Reserves comprise Bermagui, Murrumbidgee, Mumbulla and Tanja flora reserves. These reserves were created to protect the approximately sixty koalas in this area of forest on the far south coast of NSW. Should this rare colony survive and thrive (hopefully), they will need habitat corridors to move beyond this restricted area. Bermagui State Forest Compartments 2069 and 2003 provide the only publicly owned habitat corridors to the north towards Koorabean (koala) National Park and Gulaga National Park. These compartments are currently approved for logging and must be removed from the logging schedule. Survival of this unique local population of koalas makes protection of these corridors absolutely critical. The [extinction threshold](#) for NSW koalas has been markedly raised by northern koala mortality in the recent fires that burnt out 1.8m ha.

## Swift Parrots



Modelling predicts extinction of Swift Parrots by 2030 if no action is taken. Swift parrots are federally listed as Critically Endangered. In NSW they are listed as Endangered but their status has not been reviewed since 2000. State forests on the NSW south coast are increasingly important winter habitat but are being targeted for logging (as is breeding habitat in south-eastern Tasmania). Logging should be halted in forests covered by the Ulladulla-Merimbula Key Biodiversity Area as defined by Birdlife Australia. Swift Parrots like koalas are now at an [extinction threshold](#) where continued fragmentation or loss of habitat will cause their extinction.

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Photo: Swift parrot

## Information - lack of access/transparency

- Spatial data that should be published is not yet available and not available in a form that can be downloaded for analysis (shapefiles)
- No access to FRAMES so alternative “sustainable yield” scenarios can be modelled
- Untimely updating of the FCNSW portal leaves the community in the dark about upcoming operations
- It should be noted that despite the fact that Forestry Corporation and the logging contractor were aware that NSW EPA were closely monitoring the operation in Compartment 3006, a number of breaches of the CIFOA requirements on environmental protection were observed in our site visit.

**Reducing the buffer from 10m to 5m** for millions of first order creeks will see millions of trees logged. This will reduce cover and see the drying out of first order creeks. Due to tree cover and moisture creeks have higher biodiversity than the surrounding landscape. Reducing the buffer from 10 to 5m will halve tree cover and dry out these creeks in turn reducing frogs and other creatures which will affect the whole forest foodchain.

**First Order Creeks** The advice is more first order creeks will now be mapped, however unmapped creeks will have already have been logged as they were not previously protected. This was seen in Buckenbowra Forest Compartment 159 where a tree was cut in an unmapped first order creek (see photo below).



Photo: Tree stump of tree cut in unmapped first order creek - note multiple dead and live tree ferns. First order creek marked on map starts below road. Buckenbowra Forest Compartment 519 - this photo faces Corn Trail.

**Community Use** There is the need for monitoring, increasing usage of forests as a **Natural Recreational Resource** due to the incredible take up of single track mountain biking all over the country, and how local economies can benefit (such as Derby in north east Tasmania which used to be dependent on logging and now is a mountain biking hotspot, plus Pemberton WA).

Once again thank you for allowing us to show you local state forests and having the chance to go through the myriad of complex issues. Looking at how theoretical practice is applied on the ground is part of an essential transparent accountable process that the local community insist on to ensure environmental and community protections are enforced while this industry remains operational in our local native forests.

Yours sincerely

Secretary

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#### Attachment A: Unanswered Questions

1. Do logging contractors stop work on total fire ban days due to their machinery creating a fire risk ie hot exhaust pipes in dry grass, diesel carts and other fuel supplies ie drums being left in the forest.
2. How many hectares does FCNSW log every year? The Corporation manages approximately 1,884,000 (2018: 1,910,000) hectares of native forests. In 2017-18, FCNSW states that 20,000 ha were logged but does not say whether this is the gross or net harvest area (Sustainability Report 2017-18). As of 7 November 2019, 14 compartments within or adjacent to the Ulladulla-Merimbula KBA were listed as active or approved for logging within the current 12 months (FCNSW Plan Portal). Their gross area is approximately 3900 ha.

#### Yield Tables for Compartments visited on Monday 25 November

- **Mogo State Forest Compartment 159** logged under old CIFOA
- **Bodalla State Forest Compartment 3004** (Lake Brou) harvest plan published under old CIFOA but FCNSW advise will be remapped under new CIFOA
- **Bodalla State Forest Compartment 3006** under new CIFOA

#### Expected Yields from FCNSW Harvest Plans

Compartment	159 Mogo		3004 Lake Brou		3006A Bodalla	
	hectares		hectares		hectares	
Gross Harvest Area	292		176		179.2	
Net Harvest Area	220		124?		144.4	
	m <sup>3</sup>	%	m <sup>3</sup>	%	m <sup>3</sup>	%
High quality large sawlog (quota)	3,000	39.74	1,200	32.43	1300	30.59
High quality small sawlog	1000	13.25	350	9.46	400	9.41
Poles, piles and girders	0	0.00	200	5.41	50	1.18
Low quality Sawlog (salvage)	1500	19.87	750	20.27	700	16.47
Pulp (1m3-1.2t)	1250	16.56	800	21.62	1300	30.59
Firewood/Misc(1m3-1.2)	800	10.60	400	10.81	500	11.76
Total	7,750	100%	3,700	100%	4,250	100%

Spotted Gum (*Corymbia maculata*) as a proportion of expected sawlog yield for each compartment is:

- Mogo 159 45%
- Bodalla 3004 (Brou Lake) 90%
- Bodalla 3006 74%

Buckenbowra Forest Compartment 517 next to the Corn Trail was 34% pulp, 28% firewood/misc, 22% high quality sawlog and 11% low quality sawlog.

## Attachment B: NRC meeting, Monday 25 November 2019 (handout)

### Monitoring Program (NRC 4 matters)

- Ecological Function and habitat connectivity - impact of logging on rainforest and adjacent national park
- Persistence of native species - extinctions?
- Forest Regeneration and structure - impact of logging on rainforest and national park forest
- Aquatic habitat and water quality

### 1. What is the monitoring program aiming to do?

#### Aims of forest monitoring and improvement program (selected)

- improve adaptive management
- transparent information about performance
- adaptable to changes in priorities

...in order to accord with ESFM principles including, inter alia, maintaining forest values, i.e. biological diversity, sustainability, health of forest ecosystems, soil and water quality etc

- Can there be monitoring of the impact of the new CIFOA regime of leaving tree clumps in logged compartments with respect to arboreal mammals which become vulnerable to predation if forced onto the ground to travel between clumps or isolated Habitat trees

#### Mogo and Bodalla state forests are both:

- coastal forests
- projected climate change impacts - drier, hotter, more fire-prone
- habitat for federally listed threatened species e.g. Swift Parrot, Greater Glider, Spot-tailed Quoll etc
- adjacent to settlements
- have strong community opposition to logging

### 2. How will it make a difference

#### 2.1 How would/will the proposed monitoring change current logging? [*adaptive management*]

#### Taking the Swift Parrot as an example

- Historic records (pre 2000) compared with current, indicate a change in swift parrot distribution from the tablelands to the south coast (Ulladulla to Merimbula). This is likely a response to habitat loss and climate change.
- Prescriptions (old and new) don't meet the species' ecological requirements. Flowering gums essential to arriving swift parrots, spotted gums may not flower for years and other gums are flowering at different times with climate changes..
- Current logging is targeting coastal forests including Mogo and Bodalla and South Brooman and Benandarah 114 immediately north of Batemans Bay on the Highway plus scheduled in North Brooman, Boyne and Bermagui all within the 10km wide Important Bird Area stretching from Ulladulla to Merimbula as declared by Birdlife International.
- FCNSW failed to apply (inadequate) prescriptions.
- EPA failed to identify non-compliance.
- Non-compliance with recovery plan
- Zero adaptive management.
- Pre extinction threshold - are we now at the point where logging needs to stop for Swift Parrots (less than 1,000 pairs) and NSW Koalas (bushfire decimated nthn koalas - <60 sthn NSW koalas and other critically endangered fire affected species.

Biodiversity generally

- which species will be monitored and why? -- focal species? species with specific conditions?
- why choose 2000 as baseline (clearfell logging goes back to the 1960s)?
- why no desktop analysis of the available information?

## **2.2 How will the proposed monitoring respond to climate change and the consequent catastrophic impacts of drought and fires on ecological processes and biodiversity?**

*[changes in priorities]*

Northern NSW -- 1.3 million ha burnt so far

- ecosystems and biodiversity (populations - extensive localised extinctions/habitat destroyed)
- water quality and quantity
- wood supply

Assessment? Monitoring? Immediate response??

### **Precautionary measures?**

- ignition risks
- regeneration burns
- suspend logging
- 10% 'headroom' for climate and all other risks/uncertainties in sustainable yield calculations
- Accumulation dangerous amounts of post logging debris (up to 65% of tree - entire treetop) on the forest floor with not enough safe time in winter or enough staff resources allocated to burn it all

## **2.3 How will the proposed monitoring improve transparency? *[transparency]***

'Sustainable' yield

- access to FRAMES and assumptions

Spatial data

- EPA map viewer - incomplete, unuseable
- EPA map viewer, FCNSW plan portal, BioNet - not compatible
- shape files not available, e.g. retained tree clump, logging maps, logging history (not available at all)
- all designed on the assumption that people are only interested in their own locality; larger scale analysis almost impossible.
- Wildlife habitat clumps (where applicable) not visible on harvest plans

Compliance

- complaints register
- compliance register
- EPA independence?

Performance - what information will be provided about impacts and consequent action e.g. for

- threatened species
- water quality and quantity
- carbon stocks
- etc etc

**Monday 25 November**  
**NRC Site Visit**

Attending:

Peter Cochrane	Steering Committee Chair
Patrick Baker	Steering Committee (ecology/forests))
Peter Hairsine	Steering Committee (water expert)
Todd Maher	Director, Programs 0407 662 763
Jos Van der Moolen	Secretary Coastwatchers 0439 472 921
Nick Hopkins	Friends of the Forest (Mogo)
Margaret Blakers	
Sean Burke	Gulaga Protection Group Friends of Bermagui Forest (koalas)

Schedule 9am Grumpys

- >9.45 Cnr Buckenbowra/Princes Hwy.

Compartment 159 Mogo State Forest - logged.

- Swift parrots, water quality, headwaters Mogo Creek rained, fire risk,

~12 Grumpies

> 2 to Lake Brou (pick up Deb & Brett Stevenson at Moruya Heads turnoff).

Compartment 3004 Bodalla State Forest (next to Brou Lake) - not logged.

- Harvest plan issued under new regime, 8 hollow bearing trees (if present) per hectare, big trees that form hollows already cut down, basal area 10 sq m per ha. First order 10m to 5m, next to Eurobodalla NP and Batemans Marine Park, waterbird habitat, swift parrot habitat - risk of post harvest burn escaping into NP and through rainforest excluded area, abuse of public trust using area for recreational. 10km strip east of Princes Highway - very biodiverse habitat, from estuary to hind dune, littoral rainforest.
- Eden completely cleared re aerial photos.

If time go to Mitchells Ridge Road Compartment 3012 - logged last year without swift parrot prescriptions being applied.

Monitoring Program (NRC four matters)

- Ecological Function and habitat connectivity
- Persistence of native species
- Forest Regeneration and structure
- Aquatic habitat and water quality