



SOUTH EAST FOREST RESCUE

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EPA Crown Forestry Section
Att: Roger Bluett
Email: roger.bluett@epa.nsw.gov.au
info@environment.nsw.gov.au

Dear EPA,

Re: Breaches of the Coastal Integrated Forestry Operations Approval – protocol 31

SEFR has conducted a desktop audit of HPRP_East_Boyd_Timbillica_209A_210A_211A_2019A which is an approved harvest plan for the Eden region and is likely to commence very soon. Following the letter from FCNSW to the EPA saying that future operations are going to revert to the standard CIFOA rules we have concerns that this operation will be in breach of Protocol 31

Breach 1

Protocol 31

Part 5: Timber product requirements

31.4 Timber product requirements

(3) A harvesting operation must not be conducted for the primary purpose of producing low quality logs (including salvage and firewood), pulpwood logs or heads and offcuts.

The harvest plan states that the harvest conditions for this operation will be Modified Shelterwood silviculture. Section 2 of the plan has the expected yield table which is reproduced below;

Product Removal	Volume (m3)
HQ Large Sawlog (Quota)	600
HQ Small Sawlog	2,000
Low Quality (Salvage)	150
Pulpwood	15,550
Firewood	300
Total	18,600

Pulpwood, Low Quality and Firewood accounts for 86% of the total yield for this operation. This table shows that FCNSW will be in breach of cl 31.4(3) as the primary purpose of this operation is clearly for low quality logs and pulpwood.

The report commissioned by the EPA written by Dr Andrew Smith, “Review of CIFOA Mitigation Conditions for Timber Harvesting in Burnt Landscapes” of 17 September 2020 states “The findings of EPA (2020) indicate that the population of Yellow-bellied Gliders within a Yambulla State Forest LLA has a high probability of extinction, even in the absence of proposed harvesting, and the period of time for the population to recover from the 2019/20 wildfire may take over 100 years.” This makes it imperative for the

EPA to not allow this operation to happen considering that a low quality products operation could increase the chance of the local extinction of a species.

We request that the EPA urgently investigates this breach and prosecutes FCNSW to the greatest extent possible. We also request an immediate stop work order on this compartment should FCNSW commence harvesting.

Thank you for investigating this in the context of your ongoing regulatory activities and we await your response.

Regards,

Scott Daines
South East forest Rescue