



# Coastwatchers

*Eurobodalla's voice for nature*

**Natural Resources Commission NSW Forest Monitoring and Improvement Steering Committee**

**Submission Due 8 November 2019**

## **SUBMISSION BACKGROUND**

The Commission invites comment on the draft monitoring program for the Coastal Integrated Forestry Operations Approval (IFOA) from all interested parties. The NSW Forest Monitoring and Improvement Steering Committee is independently chaired by the Natural Resources Commission,

**Submission in relation to the** monitoring program will focus on issues associated with:

- Ecological function and habitat connectivity
- Persistence of native species
- Forest regeneration and structure
- Aquatic habitat and water quality

The draft monitoring plan is available at:

<https://www.nrc.nsw.gov.au/forest-monitoring>

## **SUBMISSION DOT POINTS**

**Swift Parrots** Monitoring needs to consider the need to immediately stop logging in spotted gum forest compartments on the south coast as is critically endangered Swift Parrot foraging habitat (1,000- 2,000 remain).

<https://fennerschool.anu.edu.au/news-events/news/anu-scientists-develop-new-way-track-swift-parrots> (refers to logging)

<https://www.australiangeographic.com.au/news/2018/07/persistent-logging-greatest-threat-to-swift-parrot-scientists-find/>

<https://www.difficultbirds.com/swift-parrot>

**Logging Rainforest** Another concern is rainforest in compartments are logged as not all the rainforest is protected as the rainforest definition is not inclusive enough. Also an issue when next to National Parks ie Compartment 516 next to 517 next to the Corn Trail and McDonald State Forest (both not yet in 12 month operations).

**Logging next to National Parks without a buffer** There needs to be a buffer next to National Parks and Wilderness Areas otherwise they are impacted negatively by logging. This increases the risk of post-harvest burns escaping into NPs, logging drying out neighboring forest in NP, national park trees blowing over as they did on the Corn Trail when the surrounding protecting trees gone. Also there is no public scrutiny as no neighbors are notified and NPWS is a government agency.

**Creeklines/exclusion zones** were previously marked out with pink and red tape, Habitat and Recruitment trees were sprayed H & R. These visible protections are not going to be done under new IFOA rules. Community including locals who care about their local forest no longer can check exclusions (by checking marked out taped areas) are adequate before logging or complied with after. Unless the community are out in the field with a tablet with overlay maps and gps capability (but often out of range). This means there is no transparency or accountability for the community.

**Modification to structure/Forest Structure** critical to have understorey, negligible understorey after logging and post harvest burn. See example driving out from Nelligen to Braidwood of spotted gum forest with only cycads underneath for ten of kilometres both sides of the roads (except near creeks as they are protected from logging) as all understorey that is not fire tolerant has been eradicated by post harvest burns.

**20,000 ha per year post harvest burns** not to occur as escape into residential areas/national parks. Logging dries forests out, all wildlife dies, also only fire resistant flora will survive leaving a fire resistant monoculture of trees that regrow and burrawangs (on coast). If must do burns replace by mosaic/indigenous fire stick burning.

**Coarse woody debris** 40 tonnes per ha as a baseline seems to justify leaving more cut treetops behind so that 40 tonnes is left after the post harvest burn. Mature forests are balanced and have old fallen logs already.

**Reducing fourth order creek buffers** from 10 metres to 5 metres – this will reduce species that are living in the creeklines that lived in these previously protected trees.

**Issue of bionet records expiring as only valid for 10 years (eg spotted tailed quoll)** as not going to be added to if no ecological surveys. In ten years there will hardly be any species on the bionet in State Forests triggering protection for threatened species if there are no ecological surveys done.

**Hollow Bearing Trees (HBTs)** – Need to keep all HBTs as logging a key threatening process (OEH report) as large forest gliders, owls, cockatoos etc need hollows to breed.

**Coastal SEPP wetlands 20 m buffer** Need buffers on the buffers or hard buffers not soft buffers eg can fell a tree into a soft buffer then retrieve it with machine, post harvest burns also breach into buffers.

**Large Forest owls:** Need to see the map of Landscape area set aside for large forest owls as not seeing adequate Owl Landscape exclusion zones on the logging compartment maps. (~20% of logged area?) Definition below

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| <i>large forest owl exclusion zones</i> | An ESA established for the Powerful Owl, Masked Owl, Sooty Owl or Barking Owl and is mapped in the 'Large_Forest_Owl' spatial dataset. |
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NRC should consult academics ie David Lindenmeyer, Chris Taylor

**Ecological work should be done externally** to FCNSW rather than inhouse. In Victoria private consultants do the ecological surveys (to address conflict of interest of FCNSW meeting wood supply agreements)

**Logging contractors are charged with looking ahead for wildlife**, but unable to do so safely while operating machinery with hood and with driving responsibilities. Also not qualified ecologists. Forestry in the old rules were only meant to be there 20% of the time, hardly ever there.

**Need Fact Sheets** summarising environmental conditions that trigger exclusions so the community can report ecological sitings in the one million hectares of native forest logged in NSW. ie White bellied sea eagle nest – 100 m exclusion zone while nesting etc.

Yours sincerely

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The Secretary

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