

The Hon. Gabrielle Upton
Minister for the Environment
New South Wales
17 March 2019

**re: Immediate Moratorium on logging in compartment #517 and #516
Buckenbowra State Forest and return of these two compartments to the
surrounding Monga National Park.**

Dear Ms Upton

For the reasons laid out below The Friends of the Mongarlowe River request your urgent exercise of powers provided to you in the *Forestry Act 2012* to

A. suspend the application of the transitional provisions in the new Coastal IFOA in relation to compartments #517 and #516 in the Buckenbowra State Forest in Southern NSW.

B. revoke the Coastal IFOA as it applies to these two compartments of the Buckenbowra State Forest and

C. commence the process of incorporation of these two compartments into the Monga National Park that surrounds them.

Background

Jointly with the Minister for Forestry, Paul Toole, you recently revoked the IFOA for Southern Region (the old IFOA) replacing it with the Coastal IFOA (the new IFOA) that commenced in November 2018 with the dual effect of:

- a) extending NSW Forest Agreements allowing logging in these compartments for another twenty years when agreements for these compartments were not due for renewal until 2022; and
- b) permitting logging in these compartments to proceed in accordance with the provisions of the old IFOA under the transitional arrangements.

The application of these provisions has permitted logging practices that are non-compliant, unsustainable, unsafe and uneconomic as well as being out of step with the new Coastal IFOA.

Non-compliance

Such was the rush to commence logging in these Buckenbowra Forest compartments under the old IFOA that requisite standards have been ignored:

1. Pre-logging and pre-roading reports have not complied with requirements;
2. The forest is not sufficiently replenished. Having been logged only thirty years ago it was recommended at the time of the Regional Forest Assessments that #517 be left to grow for sixty years;

3. Vulnerable wildlife is threatened/perhaps by now lost;
4. An Aboriginal scar tree has been found within compartment #517;
5. Compartment #517 is bounded by the Corn Trail, confirmed by Aboriginal Elder, Noel Butler, to have been used as a pathway from the coast to the high country for many thousands of years.

These concerns have been reported to the EPA who have required Forestry to undertake further assessments and who are themselves undertaking further investigations. Without compliant assessments no logging should have begun.

Unsustainable

Many of the provisions in the new IFOA that proscribe logging near the headwaters of water catchments, burns, protections for rainforest and wildlife are defied under current practices in #517.

Unsafe

Safety is a concern for workers, park users and for industries and citizens downstream

1. These compartments contain steep sided slopes - 26% at 20-25 degrees, and 16% at 25-30 degrees - which under Water legislative provisions would be beyond the gradient permitted for logging had they been located on the western - maximum 18 degrees - rather than the eastern side of the Great Dividing Range;
2. These slopes provide the source of the fresh water (Buckenbowra River) for coastal communities for whom constant water restrictions apply;
3. clean water is critical for downstream industries such as the oyster industry;
4. the potential for landslip/loss of topsoil into the river with heavy rain is real;
5. the potential for such a slip to endanger people using the Corn Trail is also real.

Uneconomic

Investigations comparing logging in this compartment to plantation logging have revealed the following commercial realities:

1. The contemporary commercial realities of logging these compartments indicate that they will be cross-subsidised by plantation logging thus, arguably, at taxpayers' expense;
2. Contemporary research indicates that these compartments would offer greater economic value as carbon sinks, ie., left to grow;
3. Tourism and recreational use of the forest adjacent to the ancient Corn Trail is of far greater value to the State;

4. Any danger caused to downstream or other industries or persons would be extremely costly to the State.

Friends of the Mongarlowe River are alarmed that logging of #517 will likely have been concluded by the time the EPA and Forestry investigations are complete. Without pre-logging compliance it is our view that no logging should have commenced at all in #517.

Our conclusion in order to prevent such wilful blindness and damage from occurring in future is to seek from you and the Minister for Forestry

- A. immediate suspension of any applicable IFOA relating to compartments #516 and #517 and
- B. revocation of any or all IFOAs applicable to compartments #516 and #517
- C. return of these compartments to the Monga National Park.

We are aware that our local member, John Barilaro, Deputy Premier, has recently written to the Minister for Forestry on our behalf.

Yours faithfully

Susan Doran

Secretary