



Cumberland Bird Observers Club

NSW

www.cboc.org.au

12 July 2018

To whom it may concern:
e-mail: ifoa.remake@epa.nsw.gov.au

Dear Sir/Madam,

Re: CBOC Comments on Coastal Integrated Forestry Operations Approval (IFOA) - Consultation Draft of May 2018

Cumberland Bird Observers Club Inc (CBOC) is a community organisation with about 500 members, based in Sydney. We are interested in native birds - both observing them and concerned about their conservation. The interests of many members extend beyond birds to wildlife in general, throughout NSW. Thank you for the opportunity for CBOC to give feedback on the IFOA draft.

The IFOA Consultation Draft documents (*Conditions* and *Protocols*) detail proposed actions aiming to ensure that biodiversity values (among other values) are maintained across forest areas subjected to commercial logging. This is supposed to be achieved mainly by protecting patches of forest and enforcing a range of exclusion zones around various habitat features important to threatened animal and plant species, where forestry operations will be prohibited or much constrained.

On behalf of CBOC, I offer the following comments and suggestions based on perusal of the two IFOA documents and other resource material posted by the NSW Environment Protection Authority and the Natural Resources Commission. Proposals and protocols concerning the conservation of fauna (particularly birds) and its habitats are of most concern to CBOC; so most of the comments etc below concentrate on these aspects.

CBOC Comments and suggestions

Division 3 - Conditions of Approval

Areas of Outstanding Biodiversity Value (AOBVs) are excluded from forestry operations.

COMMENTS: This is as it should be, although whether such areas exist yet, and the likely future extent of them, are unknown. What is the point of saying harm to **extinct** species is prohibited, while presumably allowing harm to Endangered ones?

Division 4 - Objectives of Approval

Objectives include "threatened species conservation".

COMMENT: Why not include conservation of all native species? Threatened ones would receive more special protections as proposed. It is good that Vulnerable species are given consideration in protocols etc, not just Endangered species.

25.3 - The importance of trained, authorised personnel to implement protocols, and diligently supervise operations etc appears to be recognised.

COMMENT: Adequate numbers of competent FCNSW field staff are extremely important in all aspects from identifying and marking exclusion zones and similar, identifying species and their habitat, and supervision of forest operations to prevent breaches of conditions.

28. - Government Ministers may exercise powers to amend this approval at any time.

COMMENTS: This could raise potential dangers of political interference in decisions, such as ministers being pressured by industry?

In cases where the practical implementation of a condition proves difficult, the true reason needs to be determined. The problem could be caused by inadequate personnel skills or diligence rather than inherent faults in the condition. Real causes should be found, to avoid erroneous watering-down of conditions.

Ch 1, Div 5 - 31 and 33. Firewood and wood for electricity generating

COMMENTS: Conditions for removing logging debris for electricity generation are not given. We have serious concerns about allowing "waste" wood gathering for this purpose - it would be difficult to control, and it would remove important habitat for many animals, notably reptiles and some smaller ground mammals.

Coarse woody debris (including firewood) is not supposed to be removed from a compartment if there is a record of any of nine woodland birds (plus various mammals and reptiles). Good idea, but diligence needed to apply it.

Ch 2, Div 1 - Registers

COMMENT: Operations and Compliance registers should be available to the public. Records of complaints should be kept and be publicly available.

Ch 2, Div 3, 42 -. Notification of harm to biodiversity

COMMENT: A good idea. Notification to EPA and response with appropriate action needs to be rapid. Incidences of harm may often be detected or reported by public.

Ch 3, Division 3 - Environmentally significant areas (ESAs)

Outcome statement for Div 3 says that locally important environmental features are "identified and permanently protected ...". ESAs of most relevance to wildlife conservation are split into Cat 1 and Cat 2, with felled trees not allowed to intrude partly into Cat 1 areas but allowed in Cat 2 areas.

COMMENTS: The two types of ESA (Cat 1 and 2) are both "important" and should have equal protection. We suggest combining all into a single category with the most strict protection rules applying. Road building or reconstruction could not be totally prohibited in ESAs but should be minimised.

ESAs include many features relevant to wildlife. Comments on proposed conditions and protocols for some of these are given below.

Wildlife habitat clumps and tree retention clumps (Protocol 22)

COMMENTS: We understand that wildlife habitat clumps should occupy at least 5% of the "landscape" (or of each compartment?) and be permanently protected (NSW Govt fact sheet). This sheet also implies that a further 5-8% of area must be protected in clumps, but the distinction between these two lots of clumps is unclear. It may be that the additional area comprises Tree Retention Clumps, which have a purpose (among others) of buffering old hollow trees in habitat clumps.

We cannot see the purpose of specifying size limits for tree retention (or any) clumps (e.g. 0.1 to 2 ha) - it is too limiting. Some compartments may have larger areas of good habitat worth maintaining in clumps, while others may have little or none.

The draft document states: Suggested habitat features that could be incorporated in wildlife habitat clumps include:

Previously protected habitat for subject species or threatened species;

Previously unmapped rocky outcrops, cliffs, heath and scrub, wetlands and their associated exclusion zones;

Rocky ground and valuable understorey habitat such as grass trees, fruiting and flowering shrubs, allocasuarina stands.

COMMENT: We strongly disagree with any minimisation of the extent of habitat clumps by counting as part of them areas already protected under other conditions (threatened species habitat, stream buffer strips, unloggable land - rough, rocky - etc.). Clumps should be additional to these features.

Retained individual trees are under (Protocol 23)

COMMENTS: We do not know if c 5 hollow-bearing trees per ha in net harvest area would be sufficient to support many hollow-needing birds or mammals. In areas where there are enough suitable hollow trees to choose from, skilled assessors are required to identify the best quality trees which are likely to last some decades without collapsing.

Occasional giant trees and glider sap feed trees should be additional to hollow-bearing trees as above. It is not clear why blackbutt and alpine ash trees need to be of larger diameter than other species before they are called "giant".

Species management plans (Protocol 21)

COMMENT: There appear to be only 4 species covered by these plans, including one bird. We would expect some other rarer species of birds (and koala) to merit such plans.

High conservation value old-growth on unassessed crown timber land (Protocol 24)

COMMENTS: Attempts to re-map forest areas originally judged to be old growth are being proposed, no doubt in the "hope" that many of these areas can now be redefined as other than old growth and thus be made available for logging. If this line is followed, proponents will need to explain very accurately for every area affected why the original assessments were erroneous and why the new assessments are reliable.

Rainforest on unassessed crown timber land (Protocol 25)

COMMENTS: As in the case of old-growth, the amount of rainforest in the North-east Region is thought to have been over-estimated originally, but to a lesser extent. Re-mapping may reveal some areas where the forest could be reclassified as moist eucalypt rather than rainforest (traditionally a contentious issue). Comments in the previous section re opening up some re-mapped areas for logging also apply in this case.

Large forest owl exclusion zones on unassessed land (Protocol 26)

COMMENT: Identification and composition details of these zones appear reasonable (to us as non-experts). As proposed, they need to be maintained permanently.

Threatened Ecological Communities (Protocol 27).

COMMENT: Certified TECs include 16 types. Proposed protective exclusion zones of 10-20m width are considered much too narrow; these zones should be more like 80-100m wide.

Ridge/headwater habitat (Protocol 29)

COMMENT: It is important to maintain some unlogged corridors of vegetation linking the buffer strips of parallel streams near their headwaters. This improves the connectivity of retained habitat and facilitates fauna movement across the landscape. This seems to be recognised in the protocol.

Species covered by the approval (Protocol 31)

COMMENTS: Part 1 includes threatened species considered "adequately protected by the multi-scale protection measures of the approval". This group includes 15 threatened species of forest birds. Among these are some rare/range restricted species such as Eastern Bristlebird and Black-breasted Button-quail, which might need extra protective measures (e.g. prevention of nest disturbance).

Chapter 4, Div 4 - site specific measures to protect habitat of fauna species

COMMENTS: These measures seem to apply only to three bird species (plus about 5 mammals and some frogs) - not clear why.

83.1. Exclusion zones are specified around nests and roosts of a limited number of bird species; but only 22 of a total of about 40 possible forest species are included. Some rare species are not included (such as Red Goshawk, Black-breasted Button-quail, Coxen's Fig-parrot, Eastern Bristlebird). Threatened diurnal birds of prey (Red Goshawk, Little Eagle, Square-tailed Kite) may be covered by exclusion zones for large stick nests. However, 50 m is probably an inadequate radius for these zones.

We also question the adequacy of 25m radius exclusion zones around nests of some parrots and most small birds, as well as large owl roosts; however we do not really know what is adequate. It

may vary depending on the vegetation density and/or topography in the buffer. Noisy machinery as close as 25 m would be likely to cause desertion by the birds. Owl roost sites may encompass a patch of trees (e.g. rainforest in a gully) and not just one tree - so in this case the whole patch would need buffering.

Also, it is not logical to prescribe fairly wide exclusion zones (100 m) around Emu nests on the North Coast but zones only 50 m wide in other areas. Emu populations existing anywhere in coastal NSW are probably threatened and all their nests should be protected by exclusion zones of at least 100 m.

Chapter 4, Division 7 - 94. Limits on the application of fire

COMMENTS: A general prohibition on deliberate burning in all Environmentally Significant Areas (ESAs) is sensible. These areas are almost all important for threatened wildlife and flora, and too-frequent fires would degrade their value. There would rarely be occasions for FCNSW to deliberately allow fire in any ESA. Such proposals would go through the EPA and be judged carefully.

Pre- or post-harvest burns in production areas are supposed not to damage large fallen logs, or standing habitat trees (alive or dead). This is difficult to ensure; but it should be possible to remove debris from around bases of retained trees so their butts are not severely burnt.

Chapter 5, Division 3 - Riparian protection

COMMENTS: Undisturbed vegetation (buffer strips) on both sides of streams can be valuable as habitat, as well as filtering soil running off logged areas to maintain water purity. If fairly wide, the strips can protect areas of intact forest including stands of old/hollow-bearing trees. For wildlife, very narrow buffers <20m each side of streams have limited long-term value (probably none for larger arboreal animal species). They would make a much better contribution to wildlife conservation if the width was about 40 to 60m each side of most streams.

For defined wetlands (swamps, lakes etc), exclusion zones should be wider than prescribed. Even small wetlands may have high ecological value. Exclusion zones of 60-80m, measured from the normal full point, would be better for all natural wetlands; plus preventing trees outside this zone from being felled into it.

Chapter 8 - Monitoring

COMMENTS: This aspect is very important, though little detail is given in the Conditions draft. Monitoring is to be applied to "ensure the ongoing effectiveness of the approval in delivering stated outcomes". The "outcomes" should include successful long-term conservation of species and ecological communities across timber production landscapes

The steering committee as proposed is a good idea, and very necessary. Including at least 3 experts such as ecologists is vital - it needs to be free of political interference.

Important data, to be collected regularly, should provide trends in indicator species populations from before logging (if possible) and for a long time after logging. This requires a commitment by Government to employ skilled, dedicated field staff over many years, to get accurate data; staff need to be able to identify individual species and habitat resources important for them.

Conclusions

The IFOA Consultation draft documents appear overall to be an honest attempt to formulate management prescriptions intended to maintain wildlife (including threatened species) in native forest areas subjected to logging operations. It is difficult for CBOC, as non-experts in the ecology of various species, to objectively judge the adequacy of some of the proposed exclusion zone areas, distances, buffer widths etc. We trust that knowledge of ecological experts was used in developing prescriptions. It is clear that aggregating these zones and patches where possible, and linking them to large, permanently reserved habitat areas should increase the utility and resilience of the whole system over time.

We consider it vital that the numerous, often detailed conditions, protocols and prescriptions for biodiversity protection are consistently and accurately applied on the ground, where they will really count. This involves a large amount of specialised fieldwork, as well as adequate numbers of skilled supervising Forestry Corporation field staff to ensure very high compliance levels by operators who may "cut corners" and violate some protections if they have to try interpreting prescriptions themselves. High levels of training of FCNSW field staff by ecologists will also be necessary, to give them ability to correctly identify animal and plant species and particular resources important to these species in the bush.

Monitoring of logging areas for indicator species (and a wider group) before and at intervals of say a few years after logging, is also very important. Over several years, observations may indicate the success or otherwise of retained unlogged areas in helping fauna and flora to survive *in situ*, or recolonise patches, or spread into regenerating forest. A long-term monitoring program would require consistent dedication of adequate numbers of skilled staff in several regions, over many years.

The proposed scenario of many fairly large areas of forest in the landscape being logged perhaps every 15-20 years and containing strips and patches of unlogged forest, could lead over time to increasing areas of young trees and declining numbers of old "habitat" trees and associated fauna. Fortunately there are some vital habitat resources in the zone covered by this IFOA, which should greatly improve the chances of survival for arboreal wildlife and which need to be maintained rigorously against all comers:

(1) Eucalypt forest (mostly old-growth) and rainforests placed in national parks and other secure reserves in the 1980s-1990s, aiming to achieve a Complete/Adequate/Representative reserve system. This process was probably never completed in some regions. There are still areas (we do not know their extent) of "informal" reserve that we consider should be rededicated as National Park or Flora Reserve as soon as possible. Until then, they cannot be regarded as safe from exploitation.

(2) Areas within State Forests that are considered too steep or too erodible to log. These form a considerable percentage of the land in some areas (30%+?). Although these areas are often of low infertility they can contain significant numbers of old trees useful for arboreal wildlife, and act as reservoirs of species to help wildlife recolonise burnt or logged areas. It is gratifying that proposals to extend cable logging to such areas have been dropped after public opposition.

We are very concerned by the possibility that many areas of forest in the North-east Region judged to be "old-growth" about 20 years ago might be re-mapped and found to not be old growth. A

similar situation exists for some original "rainforest" areas - their true forest type is in doubt. The impetus for these reassessments is an ongoing gap between hardwood supply and demand. If there is ever an intention to declassify any former old-growth forest or rainforest to allow the removal of ESA protection and logging of eucalypts, authorities will have to convince the community that the new assessments are really accurate, and explain why. Otherwise there would be widespread suspicion of a "land grab" by the timber industry.

Yours sincerely,

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Cumberland Bird Observers Club Inc

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