

Comments on the IFOA remake discussion paper

The discussion paper suggests the IFOA remake will not affect commitments made under the Regional Forest Agreements (RFAs) and NSW Forest Agreements. These agreements do contain provisions for promoting ESFM, sustainable timber supply, community consultation and Aboriginal involvement in forest management, including Native Title rights and interests. However, there is very little evidence to suggest these commitments have been met, or that there is any intention of meeting them.

With regard to promoting ESFM, the discussion paper singles out BMAD indicating,

There are circumstances where forestry operations may influence the state of an area even where they are not directly identified as a key threat, e.g. Bell Miner Associated Dieback (BMAD).

Bell miners occur naturally in eucalypt forests, and they normally have a minor (and positive) impact on forests. However, bell miner populations have increased in size, and the birds have become more widely distributed.

Dieback is a condition that affects the health of trees from the top downward. It spreads through the leaves and branches and often the whole plant will eventually die.

According to FCNSW's most recent (2005) Eden ESFM plan

Dieback in trees occurs naturally as a result of short term adverse physical impacts such as drought, unseasonally high soil moisture or damaging wildfire. Dieback in native forests is not common, especially over large areas and, when conditions ameliorate, is usually followed by tree recovery or regeneration. Chronic decline occurs when long term environmental changes, as a result of human management, impair tree health. It is increasing throughout dry and moist eucalypt forests, particularly in coastal areas. Approximately 124,000 ha of forest within Eden Region, including 22,500 ha of State forest are thought to be susceptible and much of this area is showing signs of decline.

In its 2008 BMAD listing the NSW Scientific Committee indicated

It is one expression of a range of dieback events in Australian eucalypt forests that may or may not have common underlying causes as yet poorly understood. The presence of psyllids and Bell Miners may be secondary and tertiary consequences of the syndrome, or they may contribute directly to the process of dieback.

When local residents first raised concerns about BMAD in 1994, State Forests of NSW said it was ridiculous to suggest it had anything to do with their management. In 2007 the Scientific committee rejected a nomination to list koalas on the far south coast as endangered, because they were happy to believe FCNSW's claim that koalas are every where. In the process the committee rejected the scientific data pointing to the common underlying causes of koala decline and forest dieback.

While noting reference to the north coast BMAD working group, the management of the 'Koala core habitat and corridors' Biodiversity fund project confirms the OE&H, FCNSW and the EPA have no interest in acknowledging or addressing dieback in any form on the south coast. This approach would also appear to be based on a belief that there are no common underlying causes.

Soil mass movement is also a consequence of complex interactions, although as occurred in Cpts

2133-2135 in Mumbulla State Forest, FCNSW did not identify dispersible soils using its preferred soil sampling methods. Hence, if one were to rely entirely on this soil information, it becomes difficult to explain why there would be a 'stabilised' soil mass movement area in Cpt 2135.

Studies of landslides, undertaken by the Washington State Department of Natural Resources suggest " . . . the main factor triggering a landslide is a significant natural disturbance such as a large magnitude precipitation event or earthquake. Other factors, including topography, geology, reduction of material strength over time due to weathering and land use history can predispose a site to slope failure and contribute to instability." ¹

The reference to reduced material strength over time, where shear points are more likely to develop, is consistent with the analysis of materials undertaken in 1994 from the Murrah soil landscape. These data provide some certainty that dieback is a consequence of broad scale land degradation and the processes can only accelerate.

Evidence to demonstrate the relevant agencies have complied with the Eden Forest Agreement, (clause 2.11 Forest Health and establishment), would seem to be based on the notion that logging and burning represent 'best practice management' activities.

With regard to sustainable timber supply, the RFA indicates

95.6 In accordance with clause 46(f) develop and implement an inventory system for regrowth forests and review the calculation of Sustainable Yield, using methods consistent with Attachment 11 and the principles and processes used in the Forest Resource and Management Evaluation System (FRAMES), in time for the first RFA review;

FCNSW have never accepted the methods developed by the FRAMES committee. As the NSW Auditor General (2007) indicated, 'It uses an industry accepted process to develop estimates, but more could be done to improve reliability.'

Claims that 'Current coastal IFOAs support a sustainable and value-added industry' cannot be true, because the inventory methods FCNSW and the industry agree on, do not and cannot demonstrate sustainability. Similarly, the large reduction in Net Harvest Area in the Eden region since the RFA, has not influenced rates of timber extraction.

According to FCNSW's most recent claim, average growth rates in hardwood forests are 5m³/hectares/yr. Cpt 2001, the only compartment FCNSW admits logging in Bermagui SF, up till 2011, is claimed to have been clearfelled from 1912 to 1930, is said to be a high quality site, yet was estimated to have a merchantable volume of only 33.15 m³/ha. This is less than 14% of the merchantable volume one would expect from FCNSW's average growth rate, and after 98 years, only 8.1% of the trees were estimated to have a DBH greater than 70cm. FCNSW suggests the compartment, after being thinned, is now 'post 1970 regrowth'.

In its 2009 report, the NSW Auditor General indicated the estimated remaining standing volume in Eden was 201,196 m³ of HQ sawlogs, 16,744 m³ small sawlogs and of 527,789 m³ of pulp - logs. Based on FCNSW's most recent suggestion, that trees in hardwood forests have a 'Basic Density' of 0.65t/ m³, extraction of this remaining volume would theoretically provide 1 m³ of sawlog with every 1.04 tonnes of pulp-logs.

In the absence of reliable data, and given proposals to log steeper slopes, there can be little

¹http://www.dnr.wa.gov/Publications/lm_hcp_geo_lndsllds_200901_storm_whatcom.pdf

confidence that current volume removal does not exceed sustainable levels.

The new regeneration provisions seem a little late for the Eden region, where most of the small number of unlogged alternate coupes are in Murrumbidgee and Murrumbidgee State Forests. The notion that these remnant forest patches would be logged, mostly for woodchips and firewood, to see what regenerates, when there is no concern about what previous logging has created, the known threats, or any apparent understanding of koalas, confirms a short term commitment that only benefits NSW government employees and the logging industry.

With regard to community consultation, on the south coast, the 'Koala core habitat and corridors' Biodiversity fund project has confirmed consultation remains constrained to those who agree koalas are not endangered, dieback is not a threat, and cleared private land will readily grow trees suitable for koalas.

With regard to Aboriginal involvement in forest management, it cannot be said this doesn't occur, as some Aboriginals protested about the logging of Biamanga Aboriginal Place. FCNSW has also suggested an Aboriginal work crew could be employed to ensure scientifically based community attempts to address dieback across tenures, do not proceed.

The NSW government has spent 20 years dithering, and since 2006, wasting public funds on koala surveys that have not increased an understanding of the trees koalas prefer, and more importantly, why koalas are where they are.

The IFOA remake confirms a commitment to unsustainable management. This commitment requires ignoring the known threats, the science that provides a plausible theory for the decline in forest health, and reaffirms the NSW government's ongoing rejection of the National Forest Policy statement.

At a local scale, it is apparent that the 'Koala core habitat and corridors' Biodiversity fund project has fallen well short of its reporting requirements. In the absence of any evidence to demonstrate otherwise, it is assumed previous reports of proposed koala moratorium areas in the Eden region, and 'best practise management' for these areas, were not reliable.

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