

# SOUTH EAST FOREST RESCUE

S T O P P I N ' T H E C H O P P I N '

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Mr Ian Cranwell  
Manager,  
Forestry Policy and Regulation  
Dept of Environment and Climate Change

3/11/08

Dear Mr Nicholson,

## **RE: BREACHES OF EDEN REGION IFOA-TSL, GLENBOG SF. CPT 2314-1, 2315-7**

SEFR conducted a one day audit of small areas in cpt's. 2314-1, 2315-7 and the following breaches were found. Attachments 1 and 2 are our field notes, attachment 3 is a map of plot and cd contains photos.

### **BREACH 1;**

#### **5.11. Rocky Outcrops and Cliffs**

- a) *Specified forestry activities are prohibited within areas of rocky outcrops and cliffs.*
- b) *In addition, exclusion zones of at least 20 metres wide must be implemented around all rocky outcrops more than 0.1 hectare (approx. 30m x 30m), and all cliffs.*

At the following locations we found rocky outcrops that had been logged within the outcrops themselves.

A: 0716762, 5951572 photo 677-8

2315-7 B: 0717357, 5951520 photo 704-5 C: 0717275, 5951287 D: 0717277, 5951288 p 701

These compartments contain many areas of exposed rocks and boulders and we think there would be more breaches of this type in the areas that we did not inspect. The outcrop at point B is massive, and how this was overlooked by the SFO during mark up is of great concern. Why the contractors did not stop once they realised the size of the outcrop is also of concern.

### **BREACH 2;**

#### **5.6. Tree Retention**

- f) *Non-regrowth Zone Hollow-bearing Tree Retention*
- iv. *Retained hollow-bearing trees must be selected from the trees with the largest dbhob within the two hectare area and must be live trees and should have good crown development and minimal butt damage.*

Trees H1, H3, H5 and H7 do not meet this prescription. H5 we don't think has any hollows, H7 has had its head taken out due to logging damage and inspecting what we could on the ground it is doubtful that this tree had hollows. H1, H3 and H7 are small diameter trees compared to the other H trees and stumps.

### **BREACH 3;**

#### **5.6. Tree Retention**

- g) *Non-regrowth Zone Recruitment Tree Retention*

*iv. Retained recruitment trees must show potential for developing into hollow-bearing trees. Retained recruitment trees must have good crown development and should have minimal butt damage and should not be suppressed. Mature and late mature trees must be retained as recruitment trees where they are available.*

Trees R4, R5, R6, R7, R8, R9 and R10 definitely do not meet this prescription. R4, R5 and R6 have poor crowns and form and R6 would have been suppressed. R4, R7, R8, R9 and R10 all have small DBHOB with respect to the forest stand. In regard to this point it could also be said that R1, R2 and R3, while being reasonably good form, with DBHOB's of 71cm seem on the small side for this area. These 3 trees are also right on the coup boundary. R11 has suffered major wind damage after logging, but seems that even if in one piece it would not meet the requirements.

#### **BREACH 4;**

##### **5.6. Tree Retention**

*k) Protection of retained trees*

*ii. In the course of conducting specified forestry activities, logging debris must not, to the greatest extent practicable, be allowed to accumulate within five metres of a retained hollow-bearing tree, recruitment tree, stag, Allocasuarina with more than 30 crushed cones beneath, eucalypt food tree, or Yellow-bellied Glider or Squirrel Glider sap feed tree. Logging debris within a five metre radius of a retained tree must be removed or flattened to a height of less than one metre. Disturbance to ground and understorey must be minimised to the greatest extent practicable within this five metre radius. Habitat and recruitment trees must not be used as bumper trees during harvesting operations.*

Trees H1, H5, H7, H10, H11, H12, H13 and S1 (a stag) had debris around the base. At H10, H11 and S1 the debris has been pushed there by the contractors. This makes the excuse by contractors of stags being dangerous and not clearing debris a very poor one.

#### **BREACH 5,6 AND 7;**

##### **5.6. Tree Retention**

*f) Non-regrowth Zone Hollow-bearing Tree Retention*

*i. In High Quality Habitat a minimum of 12 recruitment trees must be retained in every two hectares of net logging area.*

*g) Non-regrowth Zone Recruitment Tree Retention*

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#### **6.3. Masked Owl *Tyto novaehollandiae*, Sooty Owl *Tyto tenebricosa* Barking Owl *Ninox connivens*, and Powerful Owl *Ninox strenua***

##### **6.3.1. General**

*a) Where information indicates that Greater Gliders occur at densities of more than one per hectare within a compartment being planned for harvesting, eight hollow-bearing trees per hectare must be retained within the net logging area.*

A one hectare plot was audited, as shown on the map (attachment 3) and included trees H1-H9 and R1-R6 (attachment 1). Habitat quality was assessed as high. We think that only trees H2, H4, H6, H8 and H9 meet the HBT prescription. This is not enough to meet 6.3.1 or 5.6 f) i. Of the six R trees only R1, R2 and R3 are possible candidates but as stated above we think these trees are of too small diameter, and so 5.6 g)i. has also been breached.

With these latest areas audited it brings the total to 7 compartments with the same breaches in the past 6 months featuring 5.6 f)iv. 15 breaches, 5.6 g)iv. 16 breaches, 5.6 k)i. 23 breaches and 5.11 6 breaches. We have probably only audited 25% of the total logged area in these

compartments. We are in no doubt that there are countless other breaches that remain undetected.

The extent and consistency of these breaches shows they are not isolated one off lapses of judgement but a complete disregard for the prescriptions of the TSL by Forests NSW and contractors. All these people are meant to have read and understand the IFOA and yet these simple breaches keep occurring.

Again we ask to meet in the field to discuss these breaches. Thank you for investigating these breaches and we await your reply.

Yours sincerely,

Scott Daines