

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 Steve Hartley,
Manager, Crown Forestry Policy and Regulation,
Dept. Environment, Climate Change and Water.

15/9/10

RE: BREACHES OF EDEN IFOA-TSL, TANTAWANGALO SF, CPT 2432-COUP 2

Dear Steve,

On Monday 13/9/10 SEFR conducted an audit of Tantawangalo SF compartment 2432 and found the following breaches of the Eden region IFOA-TSL. All coordinates are AGD 66 datum.

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.*
- c) *Exclusion zones of at least 40 metres wide must be implemented around all rocky outcrops more than 0.5 hectare.*

(Note: it is not intended to exclude SFNSW from all areas that have a scattered or stony or rocky ground cover. Only those areas where rocks and exposed boulders cover greater than 70% of at least a 0.1 hectare area. Those areas that fall within the definition of Rocky Outcrops and Cliffs are considered to contain likely habitat for threatened flora and fauna.)

BREACH 1: 5.11. (a)

At the following two locations unmarked rocky outcrops >0.1ha were found that have been logged. RO 1 0722699, 5921921 : RO 2 0722675, 5921811. RO 1 and RO 2 are both adjacent to dump A. RO1 follows the coup boundary for over 100 metres north of dump A and north of 2432-5 Rd. The outcrop is partly in the FMZ 3b area and is >0.5ha. The entire outcrop that falls in the NHA, which is >0.1ha has been logged. RO 2 is along the coup boundary south of dump A and south of 2432-5 Rd. Whilst not as large as RO 1 it is >0.1ha and has been logged. Photo RO 1.

BREACH 2: 5.11. (b)

RO 1 being >0.5ha requires a 40m exclusion zone and RO 2 requires a 20m exclusion. Both of these exclusion zones have been logged. Once again both of these exclusions would have come close to meeting along a portion of their boundaries.

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.

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.

BREACH 3: 5.6 (g) iv.

With reference to the field notes on page 3, tree R1 has a small DBHOB and the top half of the crown has previously died. Tree R2 also has an even smaller DBHOB than R1 and is suppressed by the nearby H tree and is of poor form. Both trees do not meet the prescription as an R tree. Photo R2.

BREACH 4: 5.6 (k) ii.

Trees R1, H1 and H2 all have debris that is greater than 1m high within 5m of their base. Only a minor part of the coup was audited. Breach 3 and 4 trees represent almost 50% of the retained trees. It is probable that there are further breaches of these prescriptions in the area not audited. Photo R1, H1, H2.

This is the third adjoining compartment in the space of 3 months and the fifth this year that rocky outcrops and associated exclusions have been logged. This situation is completely untenable and requires urgent investigation. Currently compartment 2435, which adjoins 2433 and 2434, is being logged. Areas of rocky terrain are shown on the harvest plan for 2435, similar to the other compartments suggesting similar geology and conditions exist.

The minister needs to be informed immediately and proceedings initiated to restrain potential further logging of rocky outcrops by suspending operations in 2435 until a full investigation of these breaches and a thorough independent inspection of the current compartment for the presence of rocky outcrops is undertaken.

SEFR requests that this breach report be investigated by DECC and not handed to FNSW to self audit. SEFR also requests that after DECC's audit a meeting in the field with SEFR occurs.

Thank you for investigating these breaches in the context of your ongoing regulatory activities and we await your response.

Yours sincerely,

Scott Daines

ID	EAST	NORTH	Sp.	DBHOB approx.	Photo No	Coments
R1	722636	5921847	cyp.	50	R1	Poor crown top half of crown dead. Small DBHOB. Debris>1m
R2	722647	5921872	cyp.	40	R2	suppressed by nearby H tree. Poor form. V small DBHOB.
H1	722728	5921920	fas	90	H1	Past fire damage, poor crown, slight logging damage. Debris >1m
H2	722801	5921907	fas	80	H2	debris >1m