

# 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.

14/9/10

**RE: BREACHES OF EDEN IFOA-TSL, TANTAWANGALO SF, CPT 2434- COUP**

Dear Steve,

On Monday 13/9/10 SEFR conducted an audit of Tantawangalo SF compartment 2434 coup 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 locations three unmarked rocky outcrops were found that have been logged. RO 1 0723073, 5922772 ; RO 2 0723184, 5922681 ;RO 3 0723161, 5922547. RO 1 is located west of dump D and east of 2434-2 Rd. Dump D is the first place that we stopped. As soon as we got out of the car we were confronted with the rocky outcrop. Inspection of the area confirmed that the outcrop is greater than 0.1ha with logging disturbance over much of the outcrop. Photo RO1

RO 2 is a continuation of the rocky outcrop that is mapped on the harvest plan to the south of dump D. The marked 40m exclusion zone for the outcrop is not in the correct place. The SFO has marked the exclusion zone right on top of a rocky outcrop which is connected to the mapped outcrop. Several trees have been felled on the outcrop.

RO 3 is on the southern side of the above marked rocky outcrop approximately at dump C. As

with RO 2 this is a continuation of the mapped outcrop. A large part of the southern boundary of this outcrop is marked in the wrong position. Photo RO 3

### **BREACH 2: 5.11. (b)**

RO 1 requires a 20m exclusion zone that has been logged. RO 2 and RO3 being part of the mapped outcrop require a 40m exclusion but again this has been logged. The distance between RO 1 and RO2 is 75m which should have meant that only a 15m wide area could be logged between them. Unfortunately the entire 75m and more has been logged.

### **BREACH 3**

#### ***SCHEDULE 4***

- 89. Waste must not be buried or otherwise deposited in a compartment or roading area.*
- 90. The general work area must be kept free of waste generated during forestry activities.*
- 91. Waste must be properly and efficiently stored until it can be removed from the forest.*
- 92. Waste stored for removal must be removed within seven days after completion of harvesting or roading operations in the compartment or roading area.*
- 93. Waste must be removed from the forest and disposed of in a proper and efficient manner at an appropriate facility.*

At 0722959, 5922485 two oil filters were found left on the ground. The filters were not in a container or bag and had no oil in them. SEFR is concerned at the whereabouts of the oil that was in the filters. There can be no excuse for this breach as it is not a forestry specific rule, it is common sense, but seems to happen all too regularly. Photo W 1

This compartment is right next to 2433 which was the subject of our last rocky outcrop breach. The logging started more than 3 months after the 2433 breach report was sent to DECCW. How is it possible that the same breaches have been made in Cpt. 2434.

The rocky outcrops in Cpt. 2434 are of the same size and visibility as Cpt 2433. As stated in our report on Cpt 2433, the contractors have to be held to account over these breaches as they are meant to know the IFOA as well as the SFO. The fact that all these people have not identified these outcrops is outrageous considering the size that they are.

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