

# SOUTH EAST FOREST RESCUE

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

PO BOX 5224, COBARGO, NSW, 2550 PH: 0427 221 691

E-MAIL: [sefr@fastmail.fm](mailto:sefr@fastmail.fm)

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

18/4/10

## RE: BREACHES OF EDEN IFOA-TSL, CPT 2367- COUP 3

Dear Steve,

On Saturday 17/4/10, SEFR conducted an audit of Glenbog State Forest compartment 2367 coup 3 and found the following breaches of the Eden region IFOA-TSL.

### BREACH 1

#### **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, H2, H3, H4, H6, R1, R2, R4 and HR1 all have debris >1m within 5m of their base. Most notable were H/R1 and R1 where the debris has obviously been pushed towards the trees.

### BREACH 2

#### **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 R1, R2, R3 and R4 do not meet the prescription for a recruitment tree. R1, R2 and R3 all have a poor crown and are of poor form. All trees are not late mature or mature and show a significant size difference to nearby stumps.

### BREACH 3

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

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

*i. In High Quality Habitat a minimum of 12 hollow-bearing trees must be retained in every two hectares of net logging area. Where this density is not available, the existing hollow-bearing trees must be retained plus additional trees must be retained to meet the requirement of 12 in every two hectares. The additional trees retained must be those with the largest dbhob.*

*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.*

Tree H4 has no visible hollows and is not of the largest dbhob. Judging by the size of the stumps they would have been a better tree to retain as a H tree than this one.

## **BREACH 4**

### **5.6. Tree Retention**

#### *i) Stag Retention*

*i. Where more than ten stags per two hectares occur in the net logging area, a minimum of ten stags must be retained per two hectares of net logging area where it is safe to do so. If there are less than ten stags per two hectares, then all stags should be retained where it is safe to do so.*

There are no stags left standing in the entire coup. S1 and S2 have been pushed over for no apparent reason. There are many more stags that have been pushed over that are not listed as it was only having walked the coup that this breach was realised. It would be highly improbable that all the stags in this coup were unsafe to leave.

Tree H5 has a snig track cut 30cm deep and only 30cm away from the base. This root damage and subsequent compaction will impact on the future health of this tree. There was no obvious terrain constraint for placing the snig track so close to the tree.

Once again SEFR has found breaches that we find in every compartment audited. Individually these breaches might seem minor but at a landscape level they become very serious breaches. The application of the tree retention prescriptions by Forests NSW has been a constant source of breaches. This situation must be rectified immediately by vigorous enforcement if the TSL.

The investigation of several of our previous breaches have been given to Forests NSW to self regulate. SEFR disputes many of Forests NSW outcomes from these investigations and therefore requests that DECCW officers undertake the field audit.

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

Yours sincerely,

Scott Daines, Lisa Stone, Tony Whan

Photo numbers 309, 315 and 317 are attached. Other photos are available if requested.

## FIELD NOTES

ID	EAST	NORTH	Sp.	DBHOB approx.	Photo No	Coments
R1	715147	5947321	Fas	40	309-10	very poor form, poor crown, not next age class, log damage, debris>1m
H1	715126	5947854	Fas	100	311	debris >1m
H2	715114	5947861	Fas	80-90	312	debris >1m
S1	715092	5947857	Fas			stag pushed over, solid base and trunk, no reason for safety
H3	715014	597817	Fas	>100	313	debris >1m
R2	714890	5948095	Fas	50	314	poor form, poor crown, debris >1m
H4	714886	5948142	Fas	50	315	no visible hollows, logging damage, debris >1m
R3-S2	714924	5948134	Fas	50	316	poor form, poor crown, not R tree, stag pushed over next to it
R4	714953	5948098	Fas	40-50	317	small tree, not next age class, debris >1m
H/R1	714973	5948073	Fas	50-60	318	debris >1m, at edge of dump, debris pushed into pile 2-3m away
H5	714987	5948058	Fas	>100	319	snig track cut 30cm deep 30cm from base, butt damage
H6	715090	5948051	Fas	>100	320	debris >1m