

# 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 Andrew Mattes,  
Acting Manager, Crown Forestry Policy and Regulation,  
Dept. Environment, Climate Change and Water.

27/5/10

**RE: BREACH OF EDEN IFOA-TSL 8.8.12, MURRAH SF CPT 2052, 2051, MUMBULLA SF CPT 2133**

Dear Andrew,

SEFR has audited the Koala transect surveys for Mumbulla SF Cpt 2133 and Murrah SF Cpt's 2051, 2052 and found that all surveys fail to comply with the prescriptions in the IFOA-TSL.

## **8.8.12. Koala survey**

### *b) Transect Survey with Quadrats*

*i. An intensive survey within the proposed logging area will occur prior to harvesting to determine whether koalas use the compartment.*

In our previous breach reports on Koala surveys for Mumbulla SF Cpt 2135, SEFR expressed concern about the level of training and commitment of FNSW staff undertaking these surveys. SEFR as well as David Milledge also had serious concerns about the time taken to undertake some transects.

The following table shows the time taken per plot for all transects in the three compartments. It is in order from the quickest to the longest.

| Transect | Mins/quadrat | Surveyor | Transect | Mins/quadrat | Surveyor |
|----------|--------------|----------|----------|--------------|----------|
| 2052-7   | 0.94         | W.P      | 2052-3   | 3.2          | D.W      |
| 2051-14  | 1.05         | C.S      | 2051-3   | 3.33         | R.D      |
| 2052-6   | 1.64         | C.S      | 2051-4   | 3.33         | D.H      |
| 2051-13  | 1.71         | C.S      | 2051-21  | 3.42         | S.V      |
| 2052-5   | 1.97         | W.P      | 2133-9   | 3.5          | K.R      |
| 2051-6   | 2.18         | D.H      | 2052-2   | 3.51         | S.V      |
| 2051-15  | 2.22         | W.P      | 2052-4   | 3.58         | D.W S.V  |
| 2051-18  | 2.24         | D.W      | 2051-23  | 3.63         | S.V      |
| 2051-8   | 2.27         | D.H      | 2051-19  | 3.8          | S.V      |
| 2133-8   | 2.27         | K.R      | 2052-1   | 4.07         | S.V      |

|         |      |     |         |      |     |
|---------|------|-----|---------|------|-----|
| 2133-11 | 2.3  | W.P | 2133-1  | 4.09 | S.V |
| 2052-8  | 2.32 | C.S | 2133-10 | 4.16 | J.P |
| 2051-16 | 2.5  | C.S | 2051-10 | 4.37 | D.H |
| 2051-1  | 2.64 | R.D | 2133-2  | 4.37 | D.W |
| 2051-5  | 2.72 | D.H | 2133-6  | 5    |     |
| 2051-7  | 2.77 | R.D | 2133-7  | 5    | D.H |
| 2051-12 | 2.91 | W.P | 2133-4  | 5.62 | D.W |
| 2051-22 | 3    | D.W | 2133-3  | 6.5  | S.V |
| 2051-11 | 3.07 | W.P | 2051-17 | 6.87 | D.W |
| 2051-9  | 3.12 | R.D | 2051-20 |      | S.V |
| 2051-2  | 3.18 | R.D | 2133-5  |      | P.K |

The tasks that are to be undertaken within this time are to walk 25m while looking for evidence of Koalas like scratch marks, locate a tree within 10m, do 4 quadrat surveys, measure the DBHOB and then record this information on the data sheet.

From the table above the average time per plot is 3.25 minutes. In SEFR's opinion all plot times less than this average are totally inadequate and do not comply with the TSL and are not undertaken in the spirit of the TSL, being the protection of species. In the David Milledge report he states that plot times of 5-10 minutes would be more appropriate to adequately do all tasks. Using this as a benchmark would mean that all but 5 transects do not comply.

There is a strong correlation between the quickest plot times and certain surveyors. This reinforces SEFR's concerns about the skill, commitment and rigour of FNSW staff to undertake these surveys.

With multiple transects in all 3 compartments that do not comply, the pre-logging and pre-roading survey reports are in breach of the TSL and need to be corrected and resubmitted to DECCW, 10 days prior to logging commencing. Unfortunately compartment 2133 has been logged but FNSW are planning to move to the Murrah at any time.

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

Yours sincerely,  
Scott Daines, Tony Whan, Lisa Stone.