

# 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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22/8/08

Mr David Nicholson  
Manager,  
Forestry Policy and Regulation  
Dept of Environment and Climate Change

Dear Mr Nicholson,

## **RE: BREACHES OF EDEN REGION IFOA-TSL, CPT 734-3**

An audit of cpt 734-3 was conducted on Sunday 17/8/08. Only two small areas were inspected. Attachment 1 consists of our field notes for this compartment. The disk supplied contains photos of the trees in the field notes. GPS coordinates are AGD 66. The following breaches of the Eden TSL were found.

### **BREACH 1**

#### **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.*

We inspected five trees that were marked as H trees and found they had no hollows present. The forest must have had an adequate supply of hollow trees as evidenced by several hollows in heads on the ground. There is no excuse for marking H trees without hollows.

Of these five only H1 and H4 were trees of the largest diameter. H2 was a very small tree and was in fact smaller than the nearby R tree. With H3 they have again marked a multi stemmed tree (3) which seems to have at least 1 inclusion. Each stem is extremely small and unlikely to form hollows for a very long period of time. The area around H3 contains numerous stumps that are larger than anything retained.

### **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.*

Two R trees were found in breach. R1 looks suppressed and has a poor form. R2 is yet another multi stemmed tree (2). Its vertical stem has suffered major logging damage and the leaning stem has a major basal cavity due to fire with very little holding wood.

## **BREACH 3**

### **5.6. Tree Retention**

#### *k) Protection of retained trees*

*i. When conducting specified forestry activities and post-logging burning, damage to trees retained under Conditions 5.6 f), g) and h), of this licence must be minimised to the greatest extent practicable. During harvesting operations, the potential for damage to these trees must be minimised by utilising techniques of directional felling.*

Of the seven H and R trees four of them have suffered logging damage to varying degrees. The contractors had used a mechanical harvester. These machines were meant to enable better directional control when felling. The compartments that we have audited this year have shown that this is not the case. Our opinion is that the feeling of increased safety in these machines has made the operators less focused on the felling of the trees resulting in damaged trees.

The marking of H and R trees has again been found to be substandard. As the tree retention prescription numbers are already inadequate and with these ongoing breaches it is leaving huge areas of forest with minimal hollows to sustain the hollow dependant species. This is a systemic breach by Forests NSW and needs to be addressed immediately.

Thank you for investigating these breaches and we await your reply.

Yours sincerely,

Scott Daines