

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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16/10/2006

Mr. Ian Cranwell
Department of Natural Resources

Dear Ian,

RE: BREACH OF SOUTHERN IFOA CLAUSE 22 – CPT 2230,2234 TALLAGANDA S.F.

On receiving the harvest plan for these compartments we feel that Forests NSW are in breach of clause 22 (1) of the IFOA.

22. Principal purpose of harvesting operations

(1) The cutting and removal of timber in the Southern Region for the purposes of producing products other than:

(a) poles;

(b) High Quality Large Logs (within the meaning of clause 5); or

(c) (in the case of Ingebirah State Forest and Crown-timber lands within the Tumut Subregion that lie to the east of Kosciusko National Park) sawlogs having the dimensions set out in paragraph (e) of clause 5(2) that, in the opinion of SFNSW, are of a high quality,

may only be carried out in harvesting operations having the principal purpose of producing one or more of the products referred to in paragraphs (a) to (c).

From section 17-Yield estimates of the harvest plan the following figures are given. We have inserted the percentages and the total column.

Est vol	2230 2334 AGS	%	2234 STS	%	Total AGS STS	%
HQL	475	7.5	255	10.9	730	8.4
HQS	0	0	0	0	0	0
Salv	1665	26.3	595	25.4	2260	26.1
Pulp	4760t (4185m3)	66.2	1700t (1496m3)	63.7	6460t (5681m3)	65.5
Poles	0	0	0	0	0	0
Total	6325m3	100	2346m3	100	8671m3	100

These volume figures can in no way seem to comply with the intent of clause 22. The maximum HQL percentage being 10.9% for cpt 2230 and the combined cpts only 8.4%. Even with salvage logs combined the sawlog component is still only 34.5% of the total volume. 1/3 to 2/3 cannot be justified as a principal purpose.

We have previously obtained figures from another compartment in Tallaganda, which had royalty figures for HQL of \$45/m³, salvage \$13/m³ and pulp \$7/ton. The whole of Tallaganda is in the same price zone and so the above figures are valid for these compartments. The following table shows revenue and percentage of revenue for the products and compartments.

	2230/2234 AGS	%	2234 STS	%	Total	%
HQL @ \$45/m ³	\$21 375	28	\$11 475	36.9	\$32 850	30.6
Salvage @ \$13/m ³	\$21 645	28.3	\$7 735	24.9	\$29 380	27.3
Pulp @ \$7/m ³	\$33 320	43.7	\$11 900	38.2	\$45 220	42.1
Total	\$76 340	100	\$31 110	100	\$107 450	100

The value obtained for HQL at its maximum is 36.9% in 2234 STS but the pulp is still greater at 38.2%. With both combined it is only 30.6% HQL and 42.1% pulp. This is not a sawlog operation, it is a pulp driven operation and therefore in breach of the IFOA.

Last year Forests NSW total volume for the Southern region was 37 526m³, this is 10 974m³ less than the quota volume of 48 500m³. The last few years has shown a consistent reduction in the volume of HQL cut. I find this strange given the line that they can't keep up with demand. This shows that either the timber is not there or that the demand is not there. Either way the small amount of HQL that these compartments contribute (1.9% or 1.5%) to total volume does not justify the environmental damage that will be caused by this operation.

These breaches need to be investigated and also a closer look at all future harvest plans in relation to clause 22 needs to be undertaken. If you require further information please contact me. Thank you for your time investigating this breach and I await your reply.

Regards,

Scott Daines