

Comments on the remake of the Coastal Integrated Operations Approvals discussion paper.

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I have been involved in Forest conservation since prior to the development of the initial NSW Coastal IFOA's in 2000. I have represented conservation interests on various committees and working groups since this time. I have been Chairman of the Bell Miner Associated Dieback Working Group (BMADWG) for the past ten years. I recently attended the EPA workshop in Lismore regarding the IFOA remake.

2 Why the NSW Government is remaking the coastal IFOAs.

The discussion paper indicates that the Coastal IFOAs have not allowed forestry practices to keep pace with various changes in technology, logging and regulatory practices and over fourteen years since they were developed. However we currently have a situation where Forest corp have repeatedly shown they cannot be trusted to meet their present regulatory requirements. A number of professional audits carried out in NSW North Coast Forests reveal a systemic lack of compliance with even basic regulatory requirements (nefa.org.au) In the rare instances regulatory action regarding breaches is forthcoming it is insufficient to be a major deterrent to future regulatory failures.

Rather than bring Forest Corp into line, it seems that the government's response to this lack of compliance is to further reduce measures to protect the environment and reduce the accountability of Forest Corp through this IFOA remake.

2.1 Objectives

At the facilitated workshop we were asked to comment on the Objectives of the IFOA remake. This seemed a rather pointless, tokenistic consultation exercise, given that as I understand it, the objectives as presented in the discussion paper will not be changed. I believe that the governments position on this is untenable given the current dire situation in our public forests. This situation includes a significant decline in forest health, the increasing difficulty of Forest Corp to meet timber supply agreements under present regulations and the increasing threat to forest dependant fauna resulting from the current regime of unsustainable logging.

The valuable contribution undisturbed forests play in carbon sequestration has not be mentioned in the document. With recent releases of predictions of the serious impacts of climate change by the CSIRO, Australian Bureau of Meteorology and the International Panel on Climate Change by increasing atmospheric carbon dioxide, it seems that many forests are more valuable in their intact, relatively undisturbed state as effective carbon stores than becoming sources of carbon emissions. Additionally degraded forests should be restored to health to maximise their carbon sequestration capabilities.

In 2009 the NSW Auditor General's report, that found that Forest NSW was logging trees faster than they could be replaced should have prompted the NSW Government to address this fundamental failure of Ecologically Sustainable Forest Management.

Any review or remake of regulations that seeks to continue to log our public forests at unsustainable rates is in fact condoning the environmental vandalism which has been significantly increasing in our public forests throughout the life of the IFOA's.

Rather than proposing there be no erosion of environmental values, any remake of the IFOA or other forestry regulations, the objectives of the remake should seek to improve environmental outcomes and address the fundamental problem of unsustainable timber removal through a reduction in quotas.

Section 5

The Outcome based approach to regulation may be appropriate, but only in limited situations, such as where an outcome for regeneration, if not met could require Forest Corp to carry out enrichment planting etc. However failure to appropriately protect a Threatened species population through a logging operation cannot be easily mitigated if desired outcomes are not met. Most of the current Threatened species prescriptions should be retained, compliance rigorously enforced and effective monitoring put in place to inform of their effectiveness or need for improvement.

Section 7

There is considerable mention of a Landscape based approach to Threatened species protection, however little clarification as to what this actually means in regard to changing protections that already exist. These currently include things such as buffers on critical habitat features such as rocky outcrops, wetlands, rainforest, hollow tree retention etc and large reserves and corridor connectivity.

I would expect for the proposal to strengthen, multi scale landscape based protections for Threatened species and communities to be met would require a significant increase in all buffer distances, hollow and habitat tree retention and considerably enhanced corridor connectivity and network of ecological reserves to achieve. This cannot be possible without a significant reduction in timber availability.

There is no better way to protect Threatened species from becoming 'collateral damage' in logging operations than to confirm their presence through appropriate survey techniques and if they occur to implement site specific prescriptions, in addition to generic landscape provisions to improve their chances of survival. nb Advances in ecological survey technology such as relatively cheap remote cameras have significantly reduced the cost and increased the effectiveness of threatened fauna surveys.

The proposal to no longer require surveys for many threatened species will provide Forest Corp ignorance as an excuse to disturb or destroy Threatened species as has been provided for logging on private land under the PNF COP.

7.4 Other important issues -Bell Miner Associated Dieback.

I have undertaken the voluntary role of chairman of the BMADWG for the past ten years. A wide range of community stakeholders have also freely given considerable time and energy to the operation of the BMADWG over this period. (Government agencies have also contributed significantly to the operation of the BMADWG) Several million dollars of public funding has been expended in efforts to better understand the causes of BMAD and develop and implement measures to bring about its prevention and control. (see bmad.com)

The majority of independent North Coast forest ecologists believe that the cause of BMAD can be directly related to forest disturbance which sets in train a sequence of effects which in high risk situations leads to the development and spread of BMAD. These include logging disturbance which initiates the production of epicormic growth and new leaf tissue as canopies expand into gaps created by tree removal. The tender, new growth is high in accessible nitrogen which is attractive to the sap sucking psyllids. The removal of canopy cover also promotes understory growth through enhanced light which is facilitated by ground disturbance to particularly favour the proliferation of lantana in NE NSW coastal forests. The lantana significantly improves the habitat for bell miners and increases their breeding success. The aggressive territorial behaviour of bell miners drive away other birds which are more effective in reducing psyllid numbers. The changed site conditions may alter soil chemistry to increase leaf nitrogen content of eucalypts, further favouring psyllid proliferation. A complex set of interacting factors provide positive feedback loops which predispose the forest to increasing insect attack and cycles of defoliation leading to the full expression of BMAD which is total ecosystem collapse. There is little chance of natural regeneration as seed production from impacted forests is significantly reduced as trees slowly sicken and die.

The discussion paper quotes an outdated statement from the 2008 Scientific Determination as a justification of inaction on this very serious decline in forest health ' Due to the complex interaction between factors that have been altered as a consequence of landscape-level disturbance, there is at present no obvious means of arresting the threat presented by 'Forest eucalypt dieback.'

A more relevant and informing expert from the 2008 Scientific Committees determination is ' 'Forest eucalypt dieback associated with over-abundant psyllids and Bell Miners' cannot be arrested by controlling a single factor. Over-abundant psyllid populations and Bell Miner colonies tend to be initiated in sites with high soil moisture and suitable tree species where tree canopy cover has been reduced by 35 – 65 % and which contain a dense understorey, often of *Lantana camara* (C Stone *in litt.*). Such conditions arise as a consequence of landscape-level disturbance of forest ecosystems. 'Invasion, establishment and spread of *Lantana* (*Lantana camara* L. *sens. lat*)' is listed as a Key Threatening Process under the *Threatened Species Conservation Act 1995*.

The preceding statement provides two clues about the prevention of BMAD development. Limit canopy removal to less than 30% of a fully stocked forest and prevent the proliferation of lantana or other very dense understory components initiated by logging disturbance.

While there may be academic arguments as to the exact causes of BMAD, it is clear there is a very strong correlation between the proliferation of dense lantana understory's in 'at risk forests' and the development and spread of BMAD.

The discussion paper refers to Forest corps involvement in the BMADWG and some 'adaptive management' trials, at Mt Lindsay, supported by the BMADWG. When initiated it was agreed that these trials would have to be run over at least fifteen years to determine any meaningful results. There is presently some uncertainty whether the appropriate monitoring and adaptive responses will be carried out for a further ten years given the reduced resources provided for forest research and management. What the Forest Corp trials have shown is that it is far more cost effective to initiate BMAD prevention and control at the early stage \$200-250/h for preventive weed management than \$2500/h for total replant required to restore forests following fully developed BMAD.

Rather than mentioning an incomplete and inconclusive Forest Corp trial, a far more informative, practical and successful project supported by the BMADWG has been completed by a farming couple across 470H of severely BMAD impacted forest adjacent the severely impacted Toonumbar State Forest and National Park in NE NSW. By utilising latest techniques in herbicide application they have reversed the serious decline in forest health caused by BMAD on their property. (Sommerville et al, Ecological Management and Restoration Volume 12 number 3 Dec 2011, 'Regenerating native forest using splatter gun techniques to remove Lantana.')

The key to the prevention and control of BMAD is effective post logging rehabilitation and ongoing maintenance to prevent dense understory weed development over the long term. Practices to ensure effective post logging regeneration occurs are fundamentally important, however BMAD generally does not occur until trees are about ten years old, so the maintenance of a relatively weed free understory needs to be ongoing. This ongoing cost cannot be avoided but should reduce over time as the repercussions of the logging disturbance subside.

An effective, outcome based requirement for post logging BMAD prevention and control in North Coast coastal forests at risk of developing BMAD would be that two years after logging there should be no more than 10% cover of Lantana across the logging compartment. This level should be maintained below the 10% threshold as routine ongoing management for forest health.

8.3 Steep slope harvesting trial.

There is genuine concern from forest conservationists that the trial of cable logging will lead to an increase in maximum slopes allowed to be logged in our public forests. Any increase over current slope limits will invariably facilitate logging operations into new 'old growth' areas that have previously never been logged. These areas have always been considered 'defacto reserves' as they were never considered to be available for logging. The fact that there is pressure from industry to access these previously considered 'inaccessible areas' is itself demonstrative of the unsustainable and insatiable nature of our timber industry. These

trees in the steep upper catchments are far more valuable as a long term carbon storage and wildlife refuge than any short term profit as a saw log.

9 New Technologies.

The adoption of new technologies to improve accuracy and efficiency of the identification of protected areas of environmental significance is fully supported and long overdue.

Conclusion

It is clear that the overall decline in the health of our public forests has been facilitated by the significant reduction in resources provided for native forest management since the 1960's. At this time government made a decision to divert much of the native forest budget to the purchase and establishment of the states pine plantation resource.

In a guest editorial in the Australian Forestry journal 2005, Vol 68 No1, Florence shows how the financial priority accorded the softwood program has had some detrimental effects on the native forests. He explains that while the pine estate was being established the old-growth mountain forests were accorded the primary role in hardwood production, and these were heavily logged and importantly, and perhaps most critically, essential post-harvest treatments were substantially reduced in order to fund the softwood program. While many foresters were concerned at the environmental implications of these policies, they believed there would be ample opportunity to restore the productivity of the native forests as the softwood program entered its mature phase and generated positive flows. However, there has been no substantial investment in native forest restoration. Now that the plantations have taken over the primary wood supply role, society should accept a responsibility to restore the productivity, health and vitality of the native forests.

Given the situation of declining native forest health, a growing list of species threatened with extinction, the rising concentration of atmospheric carbon and its implications for an uncertain future for the present biota, the State Government should be developing measures to improve the sustainable stewardship of our native forests and enhancing their carbon storage capabilities not facilitating their ongoing destruction through a weakening of environmental regulations and approving the exploitation of native forests for new low value products such as biomass energy.

Thank you for considering my comments
Jim Morrison