

19-2-2018

The Premier of NSW

The Hon Gladys Berejiklian MP

Dear Ms Berejiklian,

As you are no doubt aware the effectiveness of the Regional Forest Agreements is currently under review with submissions being called for by both the EPA and the Department of Primary Industries.

The contents of this letter constitute my submissions to the EPA and Dept Primary Industries.

Thank you for your reply, received by myself on the 2-11-2017 written by Scot MacDonald MLC on behalf of Minister for the Environment the Hon Gabrielle Upton MP to my letter to yourself, dated 18-9-2017 regarding concerns with the logging of Dunn's Creek (Compartments 147 & 148 Mogo State Forest.)

Scots letter stated "Logging in Mogo State Forest is permitted under the terms of the Southern Region Integrated Forestry Operations Approval (the IFOA) The IFOA includes specific rules to minimise impacts of logging operations on native plants, animals, soils and water."

"The community's concerns have been taken seriously. The NSW Environment Protection Authority (EPA) has actively monitored the operation since it commenced. This was to ensure the community's concerns were adequately considered by the Forestry Corporation of NSW (FCNSW) during the conduct of the logging operation, and to ensure the FCNSW complied with the rules set by the IFOA." It then stated "On the 26th September 2017 Forestry Corporation NSW ceased logging operations and decided to leave the area east of the creek unlogged." Forestry Corporation did, as stated in Scot's letter, leave a large area east of the creek unlogged.

While I am very grateful for the early termination of procedures, this sadly was not before an area containing an enormous amount of wildlife, ancient hollow bearing tree's and the stunning walking/mountain bike riding trail I enjoyed almost daily were destroyed.

I feel disregarded and violated as a resident and Australian citizen that a place so enjoyed by myself and the wider community, providing habitat to an enormous population of wildlife has been decimated for the purpose of timber production.

I acknowledge and thank the EPA for the five separate inspections of areas located ahead of harvest operations and the many hours their staff dedicated towards identifying hollow bearing trees, alerting Forestry Corp of imminent breaches of prescriptions regarding said trees, and attempting to ensure Forestry Corporation adhered to the IFOA.

It is blatantly clear the EPA forestry division is greatly understaffed. Compartments in more remote areas (where communities aren't opposing logging) are largely left unchecked.

As your government is already renewing the RFA's with no regard for recommendations from scientific experts to cease native forest logging, your government must, as a matter of urgency adopt a protocol of pre logging surveys and inspections completed by EPA staff in all compartments (not

just the ones in the public eye) to ensure Forestry Corporation are not left to regulate themselves, as they have proved themselves incapable of avoiding breaches of the already inadequate RFA's.

Although Dunns Creek was logged relatively lightly, compared to regimes endured by more remote compartments, the area has been decimated and will not recover during my lifetime. The area is now void of the profound natural beauty, abundant wildlife and enjoyable community use trails of its pre logging days.

Having witnessed the entire logging operation, and the logging machines at work, I feel qualified to review the effectiveness of the RFA's, and their effectiveness in providing a balance between sustainable timber production, environmental sustainability and community social values, in these compartments and the nearby compartments 137,138 and 139 (behind Batehaven) Mogo State Forest, and to make recommendations for improvements to all these values.

My (brief) review of the effectiveness of the RFA's based on my personal experience predominately in these compartments but also in nearby compartments containing Buckenbowra, Shallow Crossing and Maulbrooks mountain bike track is as follows;

I believe the RFA's DO NOT provide a balance between community social values, environmental values and timber production. I am a member of the community who is extremely distressed by the loss of so many much loved recreation areas and their wildlife.

The forests near my home are now in what can only be described as ruins. They are no longer areas of great natural beauty full of wildlife. The once leafy tree lined paths are now bulldozed into wide barren roads leading nowhere, littered with dead trees, mounds of bare soil, and waist high noxious weeds. This deeply saddens me beyond what words can convey.

The RFA's undoubtedly fail on community social values.

RFA's allow Forestry Operations to be the only Australian industry exempt from environmental law. As such the RFA's are not environmentally sustainable.

RFA's completely disregard native animals that are not threatened species, offering them no protection whatsoever. Iconic species such as wombats, echidna's, possums, and lyrebirds are provided no precautions, re-homing or rehabilitation of their habitat in the unlikely event they survive the actual logging. The RFA's allow forestry Corporation to bulldoze wombat burrows while wombats are inside.

The RFA's result in cruel and callous animal treatment, which in any other industry or circumstance, would be illegal.

All threatened species protective measures are too weak to provide effective protection of animals and cannot possibly claim to be ecologically sustainable. There are too many clauses allowing the decimation of exclusion zones in the interest of timber production, for instance the building of roads in exclusion zones completely voids the effectiveness of the zone.

RFA's do not require or include a post logging faunal surveys. Without this information the claim of environmental and ecological sustainability is unfounded.

I have personally completed post logging surveys in the Dunns Creek compartments and have found no evidence of the wildlife, threatened or common species that inhabited areas pre-logging. By contrast I have seen a change in dominant species to predatory birds and feral animals such as foxes.

RFA's allow the frequent Forestry Corporation practice building of log dumps at Yellow bellied glider feed trees. This exposes the animals to predators and elements while feeding. No evidence of Yellow Bellied Gliders has been found at these feed trees post logging.

RFA's require a few large hollow bearing tree's to be excluded from logging to serve as "habitat "and "recruitment" trees. These trees are rendered useless for arboreal mammal habitation by the removal of surrounding trees exposing them to the elements and predators. In addition, these trees are often poorly selected by Forestry staff, hence one reason for the need of EPA pre logging surveys.

RFA's rely largely on outdated data (recorded 20 years ago) to indicate the presence of threatened species in compartments.

RFA's (written 20 years ago) do not take into account forests ability to store carbon, in the age of climate change this is a grossly neglectful omission. There is much scientific evidence that proves old growth forests store enormous amounts of carbon.

RFA's allow heavy machinery operations and road building without the mandatory (for all other Australian industries) siltation prevention methods. Our forests are full of huge barren areas of soil that continue to erode after each period of rainfall. Our once pristine beaches are now full of sediment after heavy rain. I believe this is largely due to logging.

RFA's allow Forestry Corporation to be the only Australian Industry not required to provide toilet facilities for its staff.

The RFA's undoubtedly fail on all environmental values

Although Forestry Corporation claims to replant logged areas, I have not seen any evidence of this in any of the dozens of logged areas I have witnessed. I do not doubt this lack of post logging care contributes to the unsustainable nature of timber production in our native forests and is possibly the cause of the Allied Timber Industries current push to allow State Forestry Corporations to manage (log) National Parks.

RFA's fail on sustainable timber production values.

Native forest logging under the RFA's is failing on all values. I believe it should be abandoned and industry personnel retrained in the formation and management of plantations and rehabilitation of damaged bushland and its wildlife for the purposes of the extremely popular and profitable eco-tourism trade, carbon capture and wildlife habitat.

I do not believe it is possible to log in an environmentally sustainable manner with the industrial logging machines used in the present day, regardless of the care taken by machine operators. I do not believe it's possible to drive a bulldozer through the bush, creating access for an industrial harvesting machine and not cause permanent harm to soil, waterways, wildlife and its habitat.

These machines were intended for use in plantations. To use them in native forests is abhorrent. I have watched a team of just two men to virtually clear fell acres of land in less than a day using a bulldozer and an industrial logging machine. Native forest logging can no longer claim to provide employment for huge teams of workers as it did in years gone by.

I have encountered Japanese eco-tourists at what used to be the stunning Maulbrooks mountain bike track in Mogo State Forest, they were bewildered and horrified by the shocking sight of our beautiful bushland, lying wasted on the ground, broken and burnt. Their sentiment of disbelief and disgust at the damage inflicted on our forests for the sake of timber production is very typical of all who encounter it and very damaging to our tourism image.

Forestry Corporation claims to only log a "tiny percentage 1-3%" of our native forests each year. This figure is highly disputable. The cumulative effects of this regime on our slow growing forests add up to enormous amount of forests in the regrowth stage. This may not be visible at ground level, because of strategically placed road side "visual zones" (that are now becoming less evident with the failing sustainability of timber regrowth)

Satellite imagery tells the true, appalling picture. Virtually all of our forests show the tell tale scars of logging with the barren log dumps, bright green re-growth (that usually indicates weeds) and distinctive evidence of virtually clear felled land. The frequency of logging regimes has decimated wildlife populations, devastated communities, increased sediment in our waterways and greatly reduced the forests ability to store heat and carbon. Dunns creek has now been logged twice in 15 years.

It deeply saddens me that so many places of profound natural beauty, once dense with cool fresh air and birdsong are now hot, sparsely timbered areas, virtually void of wildlife, over taken by noxious weeds. Our forests are being treated as plantations, but without the management and care provided to farmed timber plantations.

Recommendations regarding changes to RFA's and the way our public forests are logged have previously been submitted to Forestry Corp via a community meeting with EPA staff on 3-11-2017 in an itemised document set out below. I have added a discussion in italics in some instances to further clarify the issues to the independent auditor of the RFA's

Community requests intended for mitigation of harm and death to native wildlife and reduction of negative effects on the community caused by tree harvesting carried out by Forestry Corporation in each and every harvest compartment in NSW.

These requests have been made due to the extremely high level of native animal deaths occurring while tree harvesting and the distressing effect the loss of nature and wildlife is having on the community.

Designed to assist the NSW government's vision of a sustainably managed forest estate that delivers social and environmental benefits, as per Forestry Industry Roadmap.

1. Forestry Corporation to immediately abandon the common practice of building log dumps and roads in the vicinity of yellow bellied feed trees.

The building of log dumps and roads within threatened species zones is allowable. This has led to the frequent inhumane practice of building log dumps at yellow bellied glider feed trees.

So long as 15 trees are retained within 100 metres of a feed tree all else can and is often removed including all of the undergrowth and smaller trees that provide protection to the gliders while feeding. This results in the feed trees becoming a virtual trap for gliders unable to establish a new feed tree within the decimated landscape. Any glider trying to feed from these trees will be picked off by predators.

This is a disgusting practice and must, in the interest of humane animal treatment be abandoned. One could concede it so frequently occurs as it is in the interest of future harvests to ensure the feed tree and its 15 retained trees are no longer required when the next harvest occurs. Feed trees should be given a total (no log dumps or roads) exclusion zone of at least 50 metres diameter.

A post-logging nocturnal faunal survey conducted by members of the Dunns Creek community failed to show any evidence of the yellow bellied or greater gliders that inhabited the area just months prior to logging.

2. Forestry Corporation and EPA to equip themselves with drones for the purpose of positively identifying nest trees, hollow bearing trees and arboreal mammal or tree hollow dwelling bird occupied trees.

Copious amounts of discarded hollow logs lying in logging compartments are evidence to the difficulty contractors have in identifying hollow bearing trees. Drones are now assessable and easily operated. They should be utilized to avoid animal and habitat destruction.

3. Avoidance and protection of trees identified by point 2, including an exclusion zone around each tree to avoid accidental damage by machinery or falling trees
4. Forestry Corporation to equip each individual harvest team with a hydraulic crane (cherry picking machine) for the removal of the limb containing the wildlife and replacement of said limb in another suitable tree (of the same type) in an exclusion zone if avoidance of occupied tree is impossible.

5. Forestry Corporation to self implement the Glenbog Protocol to avoid the burying alive of wombats in each and every harvest compartment in the entire harvest area, not limited to roads and log dumps.

Forestry Corporation crew including managers, ecologists & planners have voluntarily attended a training day presented by wildlife experts on how to identify and avoid wombats and their burrows. The fact they chose to ignore this knowledge and continue to bulldoze wombats in their burrows is an extreme display of animal cruelty.

6. Forestry Corporation to provide a chemical portable toilet for each and every harvest crew, in the interest of public health.
7. Forestry Corporation to ensure that nature trails are protected, avoided and restored (cleared of fallen canopies) to lessen the great sense of loss of recreational areas experienced by the community.
8. Forestry Corporation and EPA to conduct a comprehensive post harvest nocturnal faunal survey in each and every compartment and publish findings on their website.

As our government has failed to make a responsible decision and end native forest logging, drastic changes must be made to provide protection and habitat for our native wildlife (not just threatened species) Protection for our water ways and protection of community use areas.

I end by concluding the RFA's are failing on all levels. I have seen evidence of this failure with my own eyes and make this judgement on my own experiences. Native forest logging is an irrational use of our countries forests. Plantations can provide jobs for industry personnel and timber for export and domestic use.

I will never again vote for or support a Government that condones native forest logging.

Yours sincerely,

Lisa Pfitzner

C.C ;

Environment Protection Agency

Department of Primary Industries

Hon Gabrielle Upton MP Minister for the environment

Hon Penny Sharpe MLC shadow environment minister

Hon Mark Pearson MLC Animal Justice Party

Hon Mark Butler MP shadow minister for energy and climate change