

8th November 2019

Coastal IFOA Monitoring Program
Natural Resources Commission
GPO Box 5341
Sydney NSW 2001
By email: nrc@nrc.nsw.gov.au

To whom it may concern,

RE: NSW Natural Resources Commission's draft Coastal IFOA monitoring program

Thank you very much for the recent briefing and opportunity to comment on the draft Coastal IFOA monitoring program. BirdLife Australia is the nation's oldest conservation organisation with over 145,000 members and supporters. Since 1901, we have been using the best available science to protect Australia's native birds and their habitat. In our research and conservation work we collaborate with government, community and Indigenous partners to prevent extinctions. BirdLife Australia is involved in many bird conservation projects and monitoring programs, and we are concerned by the precarious status of many of Australia's birds, with an increasing number of species having their status upgraded from of least concern to vulnerable, endangered or critically endangered. It is against this background that we wish to respond to the proposed monitoring program for the coastal forests of NSW.

Given that Australia is in the grip of an extinction crisis and climate emergency, BirdLife Australia believes it is time to transition from logging native forests to plantation harvesting. However, we also recognise that the collection of data can be important in improving management practices. We have extensive expertise in designing monitoring programs and as there is quite a lot of detail in the program still to be decided BirdLife Australia would like to continue to be involved in the development of the methods for this landscape scale monitoring program. We would like to see the more detailed methodologies proposed for the biodiversity monitoring as well as more details around plot locations and size. We also have concerns about ongoing habitat loss in the landscape as a result of changing landuse and the ongoing fires in the region and would like to see that this has been taken into consideration with the coup placement and harvest limits.

As such, please find attached some preliminary comments from our monitoring team on the draft monitoring program. Please don't hesitate to get in touch on 0447484067 if I can be of further assistance.

Yours sincerely



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Head of Conservation
BirdLife Australia

BirdLife Australia

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General Issues and Concerns

- The biggest issue is that the actual proposed methods for monitoring are light on details or not yet determined. This makes it hard to comment on whether the monitoring program will actually meet the stated aims of the monitoring program and collect useable data sufficient to answer the proposed monitoring questions.
- Baseline monitoring is also problematic. Logging under these new regulations commenced in November 2018. There has already been a full year of logging and the monitoring for this program will not commence until 2020 at the earliest. Historical data will provide this baseline, but it is not clear whether this will be comparable with the new monitoring regime. Will historical data based on the CAR (Comprehensive, Adequate and Representative) be compatible with the new monitoring regime, in terms of location of sampling and vegetation communities? Ideally, monitoring should have been designed and in place for at least a year, before the new logging regime began. The aims of the monitoring program cannot properly be answered as the baseline data is not yet available.
- Another pressing issue is that the new forestry regulations and the monitoring program take a landscape scale approach, relying on the wider area of habitat (nature reserves, national parks, state forest reserves and private land) to protect fauna and flora. However, this spring has seen unprecedented areas of the national park estate and state forests impacted by fires. This has involved hundreds of thousands of hectares on the north coast alone. Will the monitoring program and the forestry practices be modified in the light of this loss of habitat?
- There is no mention of triggers which could modify or stop logging, if the monitoring program shows widespread loss of fauna and flora species.
- The JANIS criteria was developed for the original Regional Forest Agreement process. If this criteria is still being used we would like to know if the reservation status of all vegetation communities have been reassessed in light of changes in vegetation coverage in the landscape. This is particularly important in light of the large scale vegetation loss that has recently occurred as a result of (ongoing) bushfire.

Specific Issues and Concerns

- The biggest concern with this monitoring program from a bird perspective is the lack of clarity around which species will be monitored. If all species are to be monitored, then the methods are not appropriate.
- Automated Monitoring is appropriate for some species – for example owls, frogs and koalas. However, for some other species, for example reptiles and other birds, technology has not developed enough to effectively sample them. Passive, automated monitoring methods are not developed enough to sample the range of bird species that exist in the landscape. Nor do they sample abundance. This is especially important for threatened species, as the aim should be to increase their populations and this may not be monitored.
- This is also true for all species, even those of least concern. Monitoring should not just aim for species persistence, but species enhancement. The wording “maintain species occupancy” is problematic. Species may be present, but not recruiting into the population. This is especially so for more cryptic or less abundant species, where changes in populations may not be picked up by presence/absence data.
- It is not clear how electronic data will be analysed and stored. Nor that this data will be publicly available and so verifiable. The Natural Resource Commission could consider an open access platform which would allow local people with call identification expertise to undertake the wider call analysis (non-focal, non-listed species). BirdLife Australia has expertise in this area.
- The number of plots may not be enough to monitor the more cryptic/less abundant species. And the size of the plots is not specified, nor are the targeted focal species. Although management plans are mentioned for listed species, there is no indication that other cryptic or less abundant species will be monitored.
- The monitoring of hollow protection is important, but protecting and monitoring younger feed trees is also vital. And all species of feed trees are important for biodiversity, not just winter flowering trees or koala food trees.



- The monitoring program also should include other biota, including invertebrates and fungi. The monitoring of waterways should include all streams, not just class one streams and monitor quality, quantity and invertebrate fauna. If the monitoring program is assessing the impacts of forestry operations on wetlands, then there should be plots in wetlands themselves.
- The methods proposed for monitoring the network of clumps and their value to connectivity is not detailed in the draft monitoring program document. Without detail of this methodology assessment of the effectiveness of the monitoring in this space can not be made.
- Ecosystem services that the forests provide should also be monitored. These include carbon sequestration, water quality and visual amenity. The impact on tourism of heavily cleared forests should also be considered.

In the absence of real details in the monitoring program, it is difficult to answer the four questions asked, so we have noted instead some general and specific issues and concerns. It would be good to have details of survey plot locations and designs, how they are allocated and in which habitats. It would also be good to know how the acoustic and camera data will be analysed, especially for non-focal species and how the data will be analysed to meet the criteria of species occupancy. It appears that the monitoring program will be finalised by the middle of 2020, without any further input from stakeholders. As there is quite a lot of detail in the program still to be decided, this is disappointing.

BirdLife Australia would like to continue to be involved in the development of the methods for this landscape scale monitoring program. We would like to see the more detailed methodologies proposed for the biodiversity monitoring as well as more details around plot locations and size. We have concerns about ongoing habitat loss in the landscape as a result of changing landuse and the ongoing fires in the region and would like to see that this has been taken into consideration with the coup placement and harvest limits