

Draft Coastal Integrated Forestry Approvals Monitoring Program 2019-2024

Comments by Harriett Swift

General Comments

1. The draft is generally comprehensive and if strictly applied should improve on current outcomes.
2. Many aspects lack independence. The Forestry Corporation has a conflict of interest and should always have independent scrutiny.
3. The budgets are often inadequate and unrealistic.
4. There should be triggers which dictate that if certain standards are not achieved, logging should cease.

Some specific feedback on particular items.

p.1 The purpose of the program is to ensure the monitoring of Coastal IFOA is delivered effectively and that its objectives and outcomes are being achieved within the available resources.

Comment: the available resources are not adequate.

p.4 Monitoring regenerating forests.

Comment: Forestry Corp is listed as responsible for monitoring this. The monitor should be independent.

p.9 Historical trends (1999 – ongoing)

In the Eden Region, this should begin in 1969, when intensive woodchipping began.

p.14 1.3 Budget

Comment: this should be funded by the Forestry Corporation and directly or indirectly from industry. This could be via a levy or bond to ensure that monitoring and restoration costs were paid by those responsible. They should not be paid by a Community Service Obligation grants to the Forestry Corporation.

p. 27 Given the high costs associated with monitoring and the limited resources available for the program, these strategies were selected through a strategic, risk-based prioritisation process in order to make the best use of available resources.

Comment: this is an acknowledgement that the monitoring program is not adequately funded and will probably fail.

p. 31, 32 Species specific monitoring – fauna and fauna

Comment: this should be independent. The \$100,000 budget is unrealistically low.

p.33 Research program - How are koalas responding to koala conditions, including tree retention rates and size?

Comment: none of this looks very relevant to south coast koala populations which are extremely low density at high risk of extinction.

p.37 Establishing baselines for trends in environmental values.

Comment: Intensive logging for woodchips has been happening in the Eden region since 1969. This was the era of the chainsaw. The baseline chosen should reflect this. Even the baseline of 1999 chosen for historical trends is unrealistic. Most loggers still used chainsaws then. Virtually none do now; they now use mechanical harvesters.

p.43 5.1 Developing supporting plans and documentation ♣ Yellow-bellied Glider (Petaurus australis) (Bago Plateau), in operation since 2013

This should include consideration of the fact that this Yellow-bellied Glider population had its endangered listing suspended by the then NSW Environment Minister, Robyn Parker together with the Primary Industries Minister Katrina Hodgkinson to enable logging in 2011. The listing was restored once the logging was completed.