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13/6/2019

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Dear NRC

Comment on: **NSW FOREST MONITORING AND IMPROVEMENT PROGRAM - Program Strategy - DRAFT FOR CONSULTATION, June 2019**

The Wilderness Society makes the following comments in relation to the draft monitoring program strategy:

1. We understand that all the money (\$11m?) for the monitoring and old growth remapping program is from public funds. This amounts to a further large public subsidy to the native forest logging industry, once again demonstrating that the public is paying for the destruction of our forests and propping up an uneconomic industry.
2. There should be a nominee of the community/conservation sector on the steering committee overseeing the monitoring program. At present there are multiple representatives from government agencies on the committee, all bound by government policy to support the current unsustainable level of logging in native forests. Notwithstanding the presence of four experts on the committee, a community conservation sector representative is essential to provide balance and community perspectives.
3. To demonstrate its independence and integrity, the steering committee should explicitly state that where monitoring indicates logging operations are (or are likely to be) ecologically unsustainable, it will recommend to government that logging levels (areas, volumes and/or intensity) be reduced.
4. Monitoring should be commenced in all high risk locations prior to any logging operations commencing in those locations. This is especially the case where the Forestry Corporation intends, under the new Coastal IFOA, to intensify logging operations and remove existing protections, e.g. stream buffers; threatened species' habitats.
5. Given the serious concerns raised by scientists and conservation and community groups in relation to the ecological impacts of the Forestry Corporation's proposed new Coastal IFOAs, and in recognition of the requirements of the precautionary principle as referenced in the draft strategy (p.4), an independent scientific risk assessment of the CIFOA should be conducted as the initial task of the monitoring program.
6. The compounding impacts of climate change, Bell Miner-associated dieback and other pests and diseases which are facilitated and exacerbated by logging and logging-associated roading should also be priorities for monitoring and reporting.

Please let us know if we can be of further assistance.

Yours faithfully

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