



4-Jul-19 submission on NRC NSW Forest Monitoring of
Coastal RFAs & IFOAs in Southern NSW Forests

... our focus here is on Koala & hollows-dependent Threatened Species



Thank you for the opportunity to comment on the drive for better forest monitoring in Southern NSW. We trust the NRC is correct in saying there will be much more 'open-ness and transparency' in future NSW Forest Management. EPA assurances that 5-yearly reviews herald State Forest 'Adaptive Management' depend upon effective monitoring.

We appreciate NRC's ongoing Koala research and opportunity to protect old-growth in NSW **North Coast Forests**.

Nature.Net is developing a 'win/win/win' South Coast Forest proposal ... for jobs, wildlife & forest carbon credits:

- A. Jobs** in nature-based tourism already in majority (refer Destination NSW 'Unspoilt South Coast' & ABS Jobs Data).
- B. Wildlife** needs Australia's unique 'centuries-old-growth-forest-hollows' animals (ref 2019 UN 'Extinction Report').
- C. 100-year State Forest Carbon Credits** based on UN/IPCC 'Forest Carbon Markets' (Launched in Eden 27-Jan-20).

South Coast data & support is sought via NRC to address the following ongoing requirements in NSW State Forests:

- (a) **KOALA acoustic sensing** to help Aboriginal & 'citizen science' teams discover koalas before logging is scheduled.
- (b) **Assist Federal Environment Minister to complete their NSW 'Koala Recovery Plan'** (EPBC Vulnerable TS 2012).
- (c) **Consult to update measurement and monitoring of BIODIVERSITY & CARBON Stocks** (Refer UN Reports 2019).
- (d) **Protect NSW Taxpayers** by consulting before quantifying any new Wood Supply Agreement for any 'Eden Hub'!
- (e) **Support 'Alps-to-Coast' connectivity** of diverse forest ecosystems from the 'Australian Alps' (2008) via Gippsland.

We note the NSW Government's early "twin commitments" to 'no net change to wood supply' and no erosion of environmental values. Note the loss of over eighty jobs in Eden and Batemans Bay already due to those two sawmills running out of large logs. Next, as all smaller logs are trucked directly to the Eden Wood-chip Mill, will be followed by thirty-year logging rotations. These clear-felled logging areas can never again provide habitat for hollows-dependent TS animals. As you know, hollows only begin to appear in Australia's old-growth Eucalypt trees over 100 years of age.

Nature.Net *Principal Consultant Mike Thompson* is a member of *Forest Stewardship Council (FSC Social Chamber)* and has been a long-term supporter of Australia's *Carbon Market Institute (CMI)* focusing on Land Sector/Forests. Mike attended the EPA IFOA briefing in Queanbeyan 21-Jun-19, before addressing the NCC Regional Conference in Lismore 22-Jun-19 and NPA State Council 29-Jun-19 before returning home to Batemans Bay. Mike organises events and runs workshops (participated in original CFI 'Train-the Trainers' course at invitation of then-Minister Greg Hunt).

Nature.Net's other recommendations on NRC Forest Monitoring agree with the NCC/NPA submission, including:

1. Logging under the IFOA requires monitoring and the establishment of baseline data to be effective operationally.
2. The full costs of monitoring the impacts of logging should be borne by *Forestry Corporation*.
3. Forest research and monitoring should be undertaken independently of *DPI and Forestry Corporation*.
4. Monitoring funds must not be used to remap forests currently protected as old-growth or rainforest.
5. Monitoring should prioritise state forests due to the degree of threat from the new IFOA.
6. All IFOA prescriptions should be assessed against measurable performance criteria.
7. The monitoring program must include triggers, or thresholds, beyond which logging is halted.
8. The monitoring baseline should be based on the condition of forests at the commencement of the CRA.
9. Monitoring should focus on:
 - a. forest growth stage and age structure, large and hollow-bearing trees
 - b. species and habitat features most at risk from logging c.koalas and koala habitat condition
 - c. extent and severity of Bell-miner Associated Dieback
 - d. non-timber ecosystem services - carbon stocks, high conservation value, and water quality/quantity.



'Alps-to-South Coast'

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