

From: Don White <whitedon@bigpond.net.au>
Sent: Thursday, 4 July 2019 1:41 PM
To: NRC
Subject: NSW Forest Monitoring and Improvement Program Submission Don White

Submissions are due for this process by Thursday (4 July), today

It is ridiculous to monitor the ecological decline of our forests while the government goes ahead and logs it anyway.

The timing of this is also questionable, with RFA renewals signed just a few months ago. This should have been resolved *before* the renewals were signed.

NSW National Parks have been seriously under-resourced for many years and need major increases in funding to meet the objectives set for them and to deal with various threats from introduced animals and organisms, not to mention a changing climate.

Land clearance rates, including of forest areas in NSW, are at a record high. There are also clear signs of policy failure in regard to private forests.

The new RFA regime has no solid data base for its forest policies. The last comprehensive analysis was conducted before the first RFAs were signed. No such analysis was made before the new RFA regime was agreed between the NSW and Commonwealth Governments.

Given numerous commitments to ecologically sustainable forest management (ESFM) It is difficult to see how the NRC can embark on a monitoring program without adequate base data on the current state of the forests, on the impact of the previous logging rounds under the RFAs, and the capacity of the forests to recover their ability to store carbon, contribute to the water cycles, or provide for interests other than wood supply.

Government ministers and agencies refused to conduct a thoroughgoing review of the state of the forests, or to countenance ending the damaging logging regime of the previous RFA regime before putting the new RFA regime in place. The last serious review was made in the late 1990s. The forests of south east NSW are in a worse state than they were when the Eden RFA was concluded in 1999, and the South Coast/Southern RFA in 2001. Yields are now approximately half what they were, meaning even the wood supply cannot be maintained. The environmental and social impacts are largely ignored.

Similar applies to the North East

Relevant Issues

The NRC was inviting eNGOs to identify which areas they felt required urgent monitoring to obtain baseline data before logging rendered monitoring irrelevant.

The monitoring will be coordinated by a steering committee. The NRC chairs this committee and therefore has the ability to give advice to government. It will be important to make future gains against the IFOA by ensuring the right things are monitored (notwithstanding the dual commitment problem). So I encourage the NRC to pursue this, and this may require support to be given to eNGOs for them to be able to provide resources to articulate a well thought out response

The NRC has said that the protocols of the IFOA will be much easier to change than the conditions. The monitoring projects for the Coastal IFOA will be determined by the end of this year and for the RFA by the end of next year.

I would make the following points

Broad priorities for monitoring:

- Monitoring should prioritise public native forests subject to the CIFOA
- Next should be private lands known to be valuable habitat
- Money should not be used for remapping currently protected old growth
- Forestry Corp should be required to pay for an adequate monitoring program as a cost of conducting their operations
- If monitoring identifies key environmental threats from logging operations then it should be a trigger to immediately halt operations
- The present day should not be accepted as the baseline, the baseline should be pre-logging ecological condition

Focus areas for monitoring

- Presence, condition and habitat extent/condition for forest dependent threatened fauna in state forests
- Water quality and quantity impacts from logging in state forests
- Surveys of large (and hollow-bearing) tree density and the age structure of forests
- The impact of regenerative logging and intensive harvesting
- Identifying appropriate baseline data which is reflective of pre-logging ecological condition

Examples of questions that need answers

- What are the effects on various levels of logging damage on Hollow-bearing tree's longevity (also when a tree is bashed causing minor external damage how severe is the internal damage)?
- What is the survival rate of Hollow-bearing and recruitment trees over logging cycles?
- What numbers of recruitment trees, and age classes, are required to maintain hollow-bearing trees in perpetuity?
- How many retained Hollow-bearing trees are suitable for use by hollow-dependent fauna ?
- How effective are prescriptions for threatened fauna - needs pre and post logging assessments ?
- How effective are 10-20-50m buffers for various threatened plants ?
- What are the effects of logging on promoting lantana and/or Bell Miner Associated Dieback (BMAD) - these and their severity need to be accurately mapped as part of the harvest planning process so they can be monitored over time
- What is the current extent and severity of BMAD and how is this changing (a helicopter sketch mapping was done in 2004 and again over the same area in 2017 and there was little correlation – so we are wasting time and resources on subjective non-repeatable and incomplete assessments)
- What are the most effective widths for riparian buffers? I contend that are 5m buffers next to useless.
- How effective are erosion mitigation prescriptions in minimising stream pollution ?
- NRC should revisit some of the flora and fauna sites they took systematic surveys of for the CRAs (there are numerous sites), or in earlier research (ie there were lots of systematic arboreal mammal and owl surveys undertaken in both the north and south). Some of these are now national parks and some SFs.
- These are long term data sets here that can be remeasured to identify changes over time - without having to wait for years.
- There were a number of water yield assessments undertaken in the north (ie Karuah) and south a long time ago that need remeasuring to see how water yields are going.

Here are some questions identified already by NRC:

1. Where have we been? Where are we now? What is changing?

- What is the current status and trend of a particular species, in a certain tenure or bioregion?
- What is the current status and trend of forest dieback?
- What is the economic and social contribution of forest-based recreation and tourism to regional economies and human well-being?
- Are the full suite of forest values being maintained or increased across the NSW forest estate?

2. What is working? What is not?

- Are koala browse tree retention rates adequate on state forests?
- Does ecological and forest thinning improve biodiversity and forest stand health?
- How effective are initiatives to improve regional nature-based tourism?
- Are forests in a better condition for being in the conservation reserve system?

3. What do we do next? What needs to change? Where do we want to go?

- How might the population of a particular species change under a range of forest management settings for habitat tree retention?
- How might the distribution and extent of an important timber species change under various climate change scenarios?
- How might forest ecosystems respond to disturbances, such as drought or increased fire intensity, under different climate change scenarios?
- Is the forest-based economy in NSW effectively responding to future opportunities and emerging risks?

Best Regards *Donald*

Prof. Don White

Don White and Co Pty Ltd

ABN [REDACTED]

Mail to : [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

Please consider our environment before printing this email

