

## South East Timber Association Comments on the Proposed Monitoring Program for the Coastal Integrated Forest Operations Approval

### Overview

The South East Timber Association (SETA) understands the political issues associated with the harvesting of native forest in NSW. Decades of activist charity campaigns, with much false and misleading content, has ingrained a view that harvesting of native forests is the biggest threat to biodiversity within native forests. Consequently, the Coastal IFOA monitoring program is being implemented ahead of a cross tenure forest monitoring, which needs to be established as soon as possible.

NSW has about 20.4 million hectares of native forest. Less than 9 million hectares, 44 percent, is on public land. Over 7.15 million hectares, 35 percent is in the NSW parks and reserve system. Less than 2 million hectares, 9 percent, is on state forest. Harvesting is excluded from more than half of the total area of state forest, less than 4.5 percent is available for harvesting over possible 20 to 80 years harvest cycles.

The Australia State of the Environment Report 2016 identifies the intensification of bushfire conditions, as posing great medium-term pressure on Australia's environment and predation by cats and red foxes has contributed the most to extinction of mammals in Australia.

SETA expects the biodiversity outlook in NSW to continue to decline, while the activist charities and bureaucracy maintains a myopic focus on less than five percent of the NSW native forest estate. Examples of the conservation underperformance of the parks and reserves system were provided in an earlier submission to the NRC.

Given the current wildfire situation in NSW, it is extremely frustrating that most of the millions of hectares of native forest burnt in NSW between 2002 and 2019, will not be subject to systematic monitoring in the foreseeable future.

### **Comments**

#### **1. Program Summary**

The integrity of the Program is compromised by the proposal to begin 'rolling out projects' before establishing a 'state-wide monitoring and evaluation Plan'.

The NSW Forest Monitoring and Improvement Program was originally under the control of the NSW DPI. Why was the program transferred to the NRC and does the NRC have regionally based staff to oversee and deliver the cross-tenure program?

How will the Coastal IFOA monitoring program be efficiently integrated into the cross-tenure program?

#### **1.1 Monitoring Approach**

Given the small percentage of the total native forest area subject to the IFOA, how will effectiveness and trend monitoring identify negative impacts emanating from non-IFOA areas?



Experience to date indicates that adaptive management will be stifled by "tape measure monitoring" and enforcement. What has been done to ensure the necessary skills exist in the relevant agencies?

### 1.1.1 Effectiveness Monitoring

The Coastal IFOA is still dominated by requirements that deliver a plethora of paperwork, which do more to aid tape measure enforcement than to deliver cost-effective monitoring. With limited resources, how will excessively detailed planning be managed, to ensure monitoring is not compromised?

### 1.1.2 Trend Monitoring

Thinning of rocky outcrop exclusion zones and thinning of some riparian exclusion zones could provide a win-win for wood supply & biodiversity. The Coastal IFOA is written to ensure this will never happen. The rules still appear to be underpinned by the myth of "permanent protection," which will stifle active and adaptive management in these zones. What outcomes will be different compared to the old rules?

### 1.1.3 Monitoring program for effectiveness and trends

Given the number of "scientists" with terra nullius ecological views, that do not accept much of Australia's forest ecology evolved in a regular disturbance environment, who determines what constitutes an expert from an ultracrepidarian?

About 15 percent of the NSW public native forest estate was burnt in 2002-03. More has been subject to intense wildfire since. Altered fire regimes alter forest structure and species composition, arguably more than climate affects. How will floristic benchmarks be set?

Coarse woody debris is much more prevalent now in south coast forests than at the time of European arrival. Some research on this subject is demonstrably wrong. How will coarse woody debris benchmarks be set?

The largest percentage of land affected by dieback (chronic decline) is outside areas affected by harvesting. At least areas subject to harvesting or low intensity burns will be rejuvenated by this controlled disturbance. Will any learnings from this be transferred to the non-IFOA forests, or will wilderness non-management principles continue?

Site occupancy by many key species, at the landscape scale, is most effected by predators and wildfires. Predator control isn't mentioned in the IFOA conditions and protocols. Wildfire is potentially encouraged by some key IFOA conditions and protocols. Can the rules be readily amended to reflect learnings from the monitoring program, or will changes be mired down by green tape?

Waterway health has been protected by former IFOA provisions. The new ground protection zones will reduce the area subject to post harvest burns and potentially increase the difficulty of containing burns. The post-harvest area burnt will reduce and the high fuel loads will ensure inevitable wildfires will be more difficult to control and have higher intensity in riparian zones and adjacent areas.



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The photo below illustrates what happens when landscape scale wildfire denuded catchments experience intense storm activity. Mass movement of tens of thousands of tonnes of rock, mud, ash, charcoal and woody debris can inundate waterways in minutes. A narrow focus on minimising the risk caused by controlled activities and the elimination of broadscale fuel management using low intensity fire can have perverse outcomes for terrestrial and aquatic biodiversity and water quality.



**Photo Border Morning Mail**

How are koalas responding to IFOA conditions? NP&WS scat surveys in the former Murrumbidgee and Mumbulla state forests, showed koala site occupancy in integrated harvest regrowth, were double and triple the density to that found in adjoining, less disturbed national parks. Controlled regeneration and chronic decline both provide browsing conditions to support koala densities which are significantly higher than historic population levels.

There are many less iconic species, particularly critical weight range mammals, that may be in greater need of research and monitoring than koalas.

Exclusion of pre and post-harvest burns from "permanently protected" areas ensures the ongoing degradation of reptile habitat and ensures any orchids and other flora, will be decimated by wildfire at some point. The conduct and evaluation of pre and post-harvest burns in some key habitat features, should be a priority action.

Current fire "research" in NSW, Queensland, Victorian and Tasmanian universities is driven by academics with a terra nullius view of Australian fire ecology. Where will the NRC find an independent evaluator who brings the necessary historical context to the evaluation?





## 1.1.4 Compliance Monitoring

EPA compliance monitoring under the prior IFOA rules has been dominated by a tape measure methodology. Most prosecutions have been for breaches that have no measurable environmental impact. In some cases, fuel reduction burns which affected "permanently protected" areas may well have had positive environmental outcomes, if post burn monitoring, rather than prosecution had been undertaken.

## 1.1.5 Adaptive management

Adaptive management opportunities will not be recognised unless regulatory staff have some forest ecology skills. What changes has the EPA made to ensure their auditing/investigative staff have the necessary skills?

## 1.2 Proposed program schedule

Monitoring forest structure and health, will require people with an understanding of what a healthy forest looks like. Will likely pre 1750 structure, informed by any available historical descriptions, be the benchmark, or will the structure resulting from less mild fire and more intense wildfire be accepted as the norm?

Understanding the historical structure of landscape features such as rocky outcrops will be key to returning this habitat to a structure that supports repopulation by declining reptile and sensitive flora species.

Protocol 38.3 (1) (c) requires landscape scale monitoring. "Local landscapes" are up to 1,500 hectares. What constitutes a "landscape" is not defined. Even at 1,500 hectares, Coastal IFOA landscapes will abut private property and parks. How will the monitoring differentiate cross boundary effects, such as wildfires and predators, from the effects arising from operations conducted within the Coastal IFOA area?

The monitoring program, is to be at "multiple landscape scales." What are the characteristics of the different landscapes?

Trend monitoring requires a cross tenure plot network to be established. What is the timeframe for the establishment of this network?

## 1.3 Budget

Funding for remapping of old-growth should be used for remapping old-growth. The resource availability and the remapping of old-growth issues must be separated. The reasons for the high error rate in the original mapping need to be understood, so that incompetent management and the use of activist mates, rather than skilled professionals is not repeated.

Old-growth is a key habitat feature and its location must be known if it is to receive priority management and protection. The current lockup and neglect management has added to the severity of the 2019 north coast bushfires, which have been ecologically destructive. Active management of wildfire risk in parks and state forest must be implemented. Given the crappy state of the old-growth mapping, how much real old-growth has been lost in the current fires?



## 1.4.1 Steering Committee

The steering committee does not appear to have anyone with the necessary historical understanding and applied ecological experience, to provide the necessary expert advice to the EPA, DPI and FCNSW.

## 1.4.2 Agencies

Open reporting and sharing does not appear to be a strong characteristic of the EPA forestry section culture. The few staff who appeared to be more team oriented and to have a good practical understanding of the old IFOA rules, were not in the right positions to make a difference. Too many staff did not have the necessary skills and behaviours and regular churn added to the problem. A cultural-change program would appear to be a necessary part of the new IFOA, if the necessary collaboration between agencies is to be achieved.

## 1.6 Community and stakeholder engagement

The program proposes to build partnerships with research institutes, NGOs and citizen science. It is of great concern that most of the forest scientists, who have science training and applied ecological and other skills relevant to native forests, are not represented within these groups.

It is recommended that the Institute of Foresters of Australia be included in the list of partner stakeholders.

## 2.1 The Coastal IFOA

The Coastal IFOA conditions set mandatory actions and controls for protecting ecological assets. The most common control is exclusion of any form of disturbance. In an ecological system, which evolved in a regime of regular disturbance by human and natural fire ignition, there is no guarantee of ecologically sustainable forest management ever being implemented.

Forest managers and regulators must recognise that controlled disturbance is a key component of ecologically sustainable forest management and include this component in relevant management plans and actions.

## 2.3 NSW Forest Monitoring Steering Committee

The makeup of the independent expert panel appears to be missing members that have applied ecological experience and historical ecological perspective. Without these skills it is likely that the deficiencies of terra nullius ecological mindset, that undermines sustainable forest management, will not be addressed.

## 2.4 The Coastal IFOA Monitoring Program

What qualification does the chief environmental regulator and the deputy director general have, to know what they are signing makes ecological sense?

## 3.1 Objectives and outcomes the program will assess

The legislative and regulatory regimes are underpinned by terra nullius principles. The IFOA "permanent protection" rules, to date have also stood in the way of the



implementation of species conservation and implementation of active and adaptive management programs.

Who will have authority to change the rules when the rules are shown to impede the implementation of sustainable forest management?

Protecting the aquatic environment seems to ignore the fact that water pollution from forestry operations is dwarfed by wildfire impacts, as illustrated in the photo above. When will the focus shift to the more than 95 percent of forest not covered by the IFOA?

**Table 8 Chapter 4 Division 2 Habitat Protection**

It is claimed that *protections are permanently established to mitigate the impacts of forestry operations.*

"Permanent protection" is a myth. This clause just perpetuates the lockup and neglect approach implemented under the former IFOAs. Any management programs must take into account threats that don't read or abide by the IFOA Protocols and Conditions. Actions that mitigate threats from wildfires, predation and other causes, must be allowed inside protected areas.

*Woody debris is maintained across operational areas....."*

This requirement lacks historical context. Early Europeans did not have to find their way through heavy under-storey and woody debris strewn forests. Current debris retention in harvested forests is excessive and adds to the intensity of inevitable wildfires.

Managers and regulators must develop a shared understanding of what constitutes a reasonable amount of woody debris, to set the habitat requirements against the management of wildfire risk. Without cooperation, it is likely that post-harvest and later fuel management burn conditions will be too prohibitive and forest managers will avoid burning.

**Table 8 Chapter 5 Division 3 Riparian protection**

This protection measure, in riparian areas, dominated by heavy ground fuels and dense regrowth results in slower growth of habitat trees and higher fire intensity when wildfires hit.

This is just one area where harvesting or low intensity burning might be used in selected area as a tool to modify habitat or reduce wildfire risk.

**Table 8 Chapter 8 Monitoring Conditions**

*"Monitoring programs are applied at multiple landscape scales...."*

As only local landscape areas have been defined, what is the process for identifying landscapes at multiple scales? Will land tenure be one boundary determinant?

### 3.2 Design requirement under the Coastal IFOA



Are the Protocol 38 requirements listed, that are relevant to parks and reserve management, also applied to management of the parks and reserves estate? If not, why not?

#### 4.3 Trends

*"The Coastal IFOA Protocols require the program to assess landscape-scale trends....."*

How will issues arising from adjoining land tenures within the landscape, that are negatively affecting environmental values on adjoining Coastal IFOA areas be dealt with? For example, where failure to control feral predators impacts on species that may or may not be subject to recovery plans.

#### 4.4 Compliance

Over the past three years, several issues have arisen relating to EPA compliance monitoring and investigation. What is the EPA doing to ensure staff are adequately trained on content of the Coastal IFOA documents and the practical application of the rules? Are staff adequately trained, to ensure authorised officers understand the extent of their powers and have the necessary investigative skills?

##### 4.5.1 Reporting Requirements

Will a similar level of detailed reporting requirements and frequency of reporting also apply to the parks and reserve management?

##### 5.1.1 Evaluating existing species management plans

SETA has noted that the Long-footed Potoroo, NSW recovery plan does not appear to have been updated since 2002. Will this plan be subject to similar review as those listed under 5.1.1?

#### Attachment 1 Risk-based prioritisation process to inform program design

As the current list of risks is not yet available, SETA reserves comment on this section.

#### Table 18

*"Harvested areas are adequately stocked with a natural floristic composition....."*

How is the natural floristic composition determined? Is it a guess at pre-1750 makeup? Or is the current composition accepted?

If the current composition is accepted, this decision may normalise an understorey dominated by invasive native species, which is usually an artefact of inappropriate fire regimes, rather than a natural floristic composition.

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