



Cumberland Bird Observers Club

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5 April 2014

Remake of Coastal IFOAs,
Environment Protection Authority NSW
e-mail: ifoa.remake@epa.nsw.gov.au

Dear Sir/Madam,

Re: Comments by CBOC Inc on *Remake of the Coastal Integrated Forestry Operations Approvals – Discussion Paper*, February 2014

Thank you for the opportunity to provide comments on this Discussion Paper. Cumberland Bird Observers Club Inc (CBOC) has about 600 members mostly based in Sydney; however, we are very interested in the conservation of birds throughout NSW. Coastal forests are very rich in native birds, including rare and currently common species. We are very concerned to ensure that forest management is carried out in a way that will not threaten the survival of any bird (or other wildlife) species.

The Objectives of the IFOA Remake (p. 5) include the statement that “the NSW Government is committed to delivering the objectives [reducing costs and improving clarity and enforceability of IFOAs] with no net change to wood supply and no erosion of environmental values”. We hope and expect that this commitment will be carried out in practice and that wildlife values are not compromised in a quest for unsustainable amounts of timber.

CBOC has concerns about a few of the proposals in the *Discussion Paper*, as detailed below:

Sustainability of both timber supply and environmental values

There is a widely held view that current timber quotas from State Forests are too large, and unsustainable without sacrificing vital areas of wildlife habitat, which would be entirely unacceptable. Even then, the extra wood gained might “prop up” quotas only very briefly. The role of eucalypt plantations as a supplementary (or indeed as part of the primary) wood supply should be revisited, if this is not already being looked at. Most of these plantations are/could be on cleared farmlands and also recycled high-quality native forest sites where trees were planted in the 1960s-1980s.

Landscape scale management prescriptions

Protection of habitat and species is intended through a “landscape-based” approach, by identifying features such as rainforest, old-growth forest, hollow trees, wetlands and creeks/rivers. This aim sounds positive. The habitat features mentioned above need to be protected as far as possible in an integrated network across the forested landscape, not only in isolated patches.

It is absolutely vital that in any remake of the coastal IFOAs, there is no loss of integrity to the existing Tier 1 landscape management prescriptions – it is crucial that these are maintained.

Logging on steep slopes

The current restriction of logging to slopes of less than 30 degrees was, we understand, introduced after much research into the soil erosion and creek siltation effects from logging on steeper slopes. The quarantined steep areas in many forests contain appreciable areas of bulk wildlife habitat, including vital large trees with hollows. Maintenance of these areas has probably allowed many fauna species to maintain viable populations in the wider landscape. These animals/birds would probably be severely impacted by any extensive logging of steep areas. The use of cable logging as postulated may not be as benign as portrayed in the Discussion Paper. It could cause as much ground disturbance as conventional snigging if many logs are dragged across the ground towards a central spar (on a ridge, say) from a semi-circular area below it. Cable logging is most efficient in clear-felling operations, and if introduced in NSW forests there may be temptations to fell more trees, including non-commercial stems to prevent hauled logs from tangling with them.

For these reasons, CBOC is strongly opposed to an extension of logging to slopes exceeding 30 degrees, even on a trial basis.

Streamside buffer strips

Undisturbed buffer strips on both sides of streams are very important – they maintain water quality and preserve some habitat. The minimum width of these strips should remain as 10 m either side. 5m-wide strips as proposed for minor (first-order) streams are too narrow to be effective. The possibility that Lidar might reveal more of these minor streams is not an adequate trade-off for the loss of riparian habitat. Wider buffer strips on larger streams should not be reduced or compromised in any way.

Pre-logging fauna surveys

The proposal to stop systematic pre-logging fauna surveys by regional ecologists is a concern. Without such surveys, important features like yellow-bellied Glider feed trees, large owl nesting and roost trees may only be found as flukes in daylight traverses of proposed logging blocks done while working out landscape-scale conservation zones. Any proposed activities to replace current pre-logging fauna surveys must be effective in identifying habitat areas and individual habitat features needing protection, especially for rarer species. The effort should not be stinted by “penny pinching”.

Post-logging fauna surveys

The proposal to introduce a post-logging environment monitoring program is welcome. This would help to provide important feedback on the effectiveness of the landscape scale management in conserving forest wildlife, and how well forest management is proceeding under the revised prescriptions. **It is important to work out soon how this is to be implemented in practice, and to guarantee it is adequately staffed and funded.**

Yours faithfully,

I. G. Johnson

Ian Johnson

Conservation Officer,

Cumberland Bird Observers Club Inc