From: [redacted]
Sent: Saturday, 5 April 2014 10:12 PM
To: _ALL-EPA-Forestry-IFOARemake
Cc: [redacted]
Subject: Coastal IFOA remake

Re:**7.4 Other Important Issues - Bell miner associated dieback**
pp 27-28

The discussion paper should note, BMAD affects are not only 'top downward' (27) but also soil upward, and ground level disturbances associated with BMAD need to be taken into consideration.

The discussion paper should note that psyllid population increases are associated with tree health and vigour, and tree health is associated with soil health and structure, as well as forest structure.

The section on BMAD should indicate inappropriate anthropogenic landscape changes are associated with BMAD. See BMAD Lit Review.

The discussion paper should indicate that the large-scale operational trial that Peter St Clair has reported is not a trial for controlling BMAD (28); it is a trial for the continuance of over-logging, and the restocking of stems, despite the presence of BMAD, and is therefore inappropriate as a decision support tool where the real costs in forest regeneration of further harvesting may not be financially appropriate.

Some research identifying BMAD has already been completed, it is important not to ignore present knowledge. Please refer to the BMAD Literature Review.
The research that is required is in developing and producing and implementing BMAD risk assessment, and forest health husbandry models, as decision support for any forest based activity, along with treatments that increase the forest health factors present and reduce the factors associated with BMAD.

It is also important to not ignore the other trials being run by NPWS and private landholders which have found that BMAD spread and severity can be controlled by removing structurally inappropriate *Lantana camara* in such a way that local mesic species recover. In the southern coastal forests native vines over-growing where canopies have been disturbed, are known to provide similar structural changes as *Lantana*. Also, as BMAD has been found by the BMAD Working Group to also occur in regrowth forests without *Lantana* or rampant vines, but that are overstocked with same age young trees, where drought conditions have exacerbated the high water needs of the young trees, and resulted in tree stress, and as tree stress is associated with increased psyllid activity, a dynamic system model of the biotic functions that maintain healthy forest communities, free of upscaled BMAD, is required as an appropriate IFOA response to BMAD.

As BMAD may occur as a result of both anthropogenic and climatic conditions, if these are not the same, then the precautionary principal must apply to the management of forests for health, and it is therefore appropriate and vital that a BMAD forest health risk assessment protocol is developed and implemented. To do this a dynamic system model of forest health for each BMAD at risk forest community is required, in which the known factors associated with forests expressing health and BMAD are calibrated and used to determine which management actions, over what period, and to what degree, are required for Ecologically Sustainable Forest Management. It is appropriate that a BMAD forest health risk assessment protocol is put in place so as to inform all public forest operational decisions and actions.

The BMAD WG has already completed a preliminary potential risk by forest type map.

The discussion paper has failed to deliver for forest health with reference to BMAD with only intention to repeat preliminary studies already completed by the BMAD Working Group, and failing to indicate the real measures that will achieve reasonable control of BMAD as indicated by the NPWS and private landholder trials carried out under the auspices of the multi-agency BMAD Working Group.

Best regards,
Michelle

Michelle (Woo Wei) Richards
NEFA Representative, BMAD W
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