



SOUTH EAST FOREST RESCUE

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24/3/2021

EPA Crown Forestry Section

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Dear EPA,

Re: Breaches of the Coastal Integrated Forestry Operations Approval – Condition 13 and Protocol 31

SEFR has conducted a desktop audit of HPRP_Mogo_180A_2021 which is an approved harvest plan for the South Coast region. FCNSW are in breach of the CIFOA Condition 13 and Protocol 31.

Breach 1

Condition 13

13. Forestry operations covered by the approval

13.1 This approval authorises the carrying out of the operations and activities set out in paragraphs (a), (c), (d), (e) and (f) of this condition, in accordance with any other conditions, terms and requirements in this approval and, where relevant, the protocols:

*(b) It is a condition of this **approval** that any of the above **harvesting operations** are carried out so that they:*

*(i) comply with the **timber product** requirements in **Part 5 of Protocol 31: Matters covered by the approval**;*

Breach 2

Protocol 31

Part 5: Timber product requirements

31.4 Timber product requirements

*(3) A **harvesting operation** must not be conducted for the primary purpose of producing **low quality logs** (including salvage and firewood), **pulpwood logs** or **heads and offcuts**.*

Condition 13.1(b)(i) states that operations are to comply with the timber product requirements in Part 5 of Protocol 31. The information below in regards to Protocol 31 clearly shows this is not the case for this operation and therefore FCNSW is in breach of this clause.

The harvest plan states that the silviculture system for this operation will be selective, and as such 31.4 (3) applies to this operation. This operation is not a thinning's operation and therefore cl 31.4(4) does not apply.

Below is the expected yield table from the harvest plan

Product Removal	Volume (m3)
HQ Large Sawlog (Quota)	1000
HQ Small Sawlog	500
Low Quality (Salvage)	500
Pulpwood	1,000
Firewood	1,000
Total	4,000

Pulpwood, firewood and low quality account for 62.5% of the total yield for this operation. This table shows that FCNSW are in breach of cl 31.4(3) as the primary purpose of this operation is clearly for low quality and pulpwood.

As there are also other possible breaches for this operation including failure to have EPA approved Site Specific Operating Conditions and failure to operate in accordance with ESFM we request an immediate stop work order be placed on this compartment if FCNSW commences harvesting.

We also request that the EPA urgently investigates this breach and prosecutes FCNSW to the greatest extent possible.

Please advise by **COB 26 March 2021** whether the EPA will take the requested action as set out above.

Thank you for investigating this in the context of your ongoing regulatory activities and we await your response.

Regards,

Scott Daines
South East forest Rescue