



South East Region Conservation Alliance

www.serca.org.au
sercansw@gmail.com

PO Box 724 Narooma NSW 2546 AUSTRALIA

Breaches of the IFOA by State Forests NSW (SFNSW) in Mumbulla State Forest Compartment No 2135

Table of contents

CONSULTATION	1
SURVEYS	1
'ROAD MAINTENANCE' / HARVESTING	2
REGULATION TREE HARVESTING CHOICES.....	2
SUSTAINABILITY	3
DATA.....	3

CONSULTATION

SERCA finds that SFNSW has breached Clause 8.8.12 a) regarding pre harvest consultation.

"Consultation with the local community should be undertaken during the harvest planning stage. **As a minimum** this should include contact and exchange of information with neighbours, local animal welfare and conservation groups." In response to this:

1. SFNSW contacted neighbours.
2. SFNSW did not contact the local animal welfare group as reported by Lois Katz, a WIRES member.
3. SFNSW did not consult with SERCA, the main south east area conservation group.
4. SFNSW did not hold community information sessions regarding logging in the area.
5. SFNSW did not consult with the local Aboriginal community via the Biamaga Board.

SURVEYS

SERCA discovered that SFNSW had breached Clause 8.8.12 b) regarding how Threatened Species Licence (TSL) surveys are meant to be conducted.

1. 8.8.12.b) i
SFNSW did not comply with the requirements of the TSL. Because of this, SFNSW was told to stop logging, which they did.
2. 8.8.12.b) iii
SERCA attests that the second lot of surveys were still in breach because SFNSW still did not comply with TSL requirements and resumed logging.
3. SFNSW is prohibited from logging within a minimum of a 2k boundary from where koalas have been surveyed or where local knowledge indicates such proximity of koalas to logging activities. SERCA attests that SFNSW has breached this requirement.

'ROAD MAINTENANCE' / HARVESTING

SERCA finds that SFNSW has undertaken 'road maintenance' illegally and in breach of the TSL and the Eden IFOA.

1. When told to stop harvesting, SFNSW breached the TSL by undertaking road maintenance. SERCA finds SFNSW in breach because the IFOA states, Clause 5 Forestry operations to which the IFOA applies, that SFNSW were only permitted to undertake "... ancillary road construction, namely the provision of roads and fire trails..." but not road maintenance.¹
2. SERCA also finds SFNSW in breach of "routine road maintenance" (as defined in the TSL and the Eden IFOA), in that they logged trees which were over 20cm in diameter. (See pic below)
3. In any event, SERCA finds that SFNSW breached Clause 40 of the IFOA in that their road and fire trail management plan (even if that was their intention) was not made publicly available.

So SERCA finds that SFNSW undertook an illegal harvesting operation while conducting illegal road maintenance.



Figure 1: Tree logged during illegal 'road maintenance' breaches the 20cm diameter provision

REGULATION TREE HARVESTING CHOICES

SERCA finds that SFNSW has breached tree-harvesting regulations as in Retention Clause 5.6 h.1 and 5.6 k.3 of the IFOA.

1. In logging operations, the biggest trees must be marked as recruitment trees, with an R and left to turn into hollow bearing trees. If trees with hollows exist they must be marked with an H and a certain amount of trees have to be marked as R trees. SFNSW has not retained the biggest trees in Compartment No 2135 and not marked any R or H trees.
2. This breach is not specific to Mumbulla State Forest. Locals have noted that SFNSW has been in breach of this RFA requirement for the past 10 years.

¹ Eden IFOA, clause 5(9)

SUSTAINABILITY

SERCA also finds that SFNSW is cutting above sustainable yield. Several clauses relate to this requirement in all forestry agreements.

The average age of trees in all the unlogged forest is about 200 years. This is based on local knowledge of a Tanja State Forest sawmill employee experience when working in a small salvage sawmill in 1978 - 1988.

The first round of integrated logging in these forests in 1970-1980 removed trees in about 50% of the coupes in each compartment.

The second round (now) is going to remove all the trees in the remaining coupes, meaning that when completed 100% of available trees will have been removed.

This means that within a period of 40 years, all available trees will have been removed, and it will be at least 150 years before similar trees will again be available in the forest

This forestry practice is therefore deemed unsustainable.



Figure 2: Gnupa State Forest, 2009.

DATA

In presenting this data, it should be noted that it was taken from a week's activity in only one logging compartment, Mumbulla State Forest, Compartment No 2135. Logging activities are currently being undertaken or planned at Yurammie, Bermagui, Murrah and Tanja State Forest.

In view of these serious known breaches by SFNSW, SERCA calls for an immediate cessation of all logging activities in the SE of NSW until SFNSW complies with all the IFOA breached clauses as stated above.

Dr Bronte Somerset
SERCA
15 April 2010