Submission No 419

INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN NEW SOUTH WALES

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I have been involved in independently monitoring Forests nsw operations in my area for compliance with licence conditions since the inception of the regional agreements.
My view is that the NSW government have serious and pressing a responsibility to managing its public lands so as to ensure that the biodiversity is on this land is maintained, the current logging intensity preferred by FNSW in the State forests is encouraging weeds, pests, disease and most notably fire within our forest landscape. All of these are conspiring is a "perfect storm" for the forests harvested this way pushing them to the brink of a negative feedback cycle.
Securing nsw's biodiversity is in the human populations own best interest as it may it to face significant obstacles in the near future and having functioning ecosystems with their biodiverse genetic background could be the a defining factor.
I put it that the legislation and regulations put in place to safeguard nsw's natural ecosystems is faulty, partly due to the "human error level" causing a creep in enacting the intent of legislation on the ground, coupled with a new intent by FNSW to push the "legal boundary's" of conditions governing logging operations.
The current system has reached its crescendo with the Single Tree Selection silvi cultural IFOA definition being artfully "re interpreted*" as allowing the removal over 40% basal area of trees in a tract pre harvest . In wedding bells state forest Cpt 553 FNSW's reinterpretation of these conditions has allowed harvest intensity's under the IOFA rise until it lead to this operation reaching potential pollution levels that it should have triggered the EPL under the POEO (Which has its own independent intensity guide line, This allegation that the EPL license was triggered in 553 is disputed by the EPA) but regardless is an example of the "accepted" intensity levels being pushed in to the realms illegality, beyond what a forest can be realistically be expected recover from is any sort of functional state…. let alone support any future industry.
I copy below my stump counts in wedding bells as evidence that the FNSW and The EPA in attempts to cover first "the contracts" then the reality of what they have done, have now entered the realms of fantasy.
I also draw attention to the Styx river state forest breaches of Rufus scrub bird habitat (conditions of the TSL) as another example of the current FNSW leader ships public concern for threatened species being expose as nothing more than feigned empathy. (copy of complaint attached)
In closing I draw attention to this as the main problem as I see it : natural ecosystems don't have their true long term values represented in the current system, as usual their only worth is what we can squeeze out of them now.

Wedding bells stump counts and basal area measurements.
Compartment 536.
Transect length 230m width 10m
62 trees measured
Stumps < 40cm: 22 (this equates to 110 stumps to the ha)
Trees left standing: 40
Basal area for stumps measured 2253867 (sqcm)
Basal area in retained trees 2132924
This represents a removal of 51.3% of Basal Area pre harvest.
Largest trees retained 200cm/193cm/190cm
Largest stumps 272cm/260cm/246cm
(this is diameter at stump height. 50cm which has the been adjusted by down by 6cm to account for the difference to diameter at breast height). Retained trees are blackbutt. no trees were marked for retention, exclusions only.
Compartment 553.
1. Transect length 650m width 10m
137 trees measured.
Stumps <40cm: 60 (87 <40cm trees removed from 1 hectare) remaining trees: 71
Basal area of stumps 11253885 basal area of retained trees 2237022
Total BA for tract. 13490907.
83.41% of BA has been removed for this transect.
Largest trees retained 280cm/241cm/232cm (all blackbutt)
Largest stumps 324cm/322cm/308cm (stump just outside transect 338cm ….Tallowood ?)
2. Transect 930m (198m within harvest exclusion)

112 trees measured (21 in exclusion)
Stumps < 40cm = 41 (for 732m within NHA)
Remaining trees 50. (NHA)
Basal area removed 7303225cm
Trees retained 5105737cm
Total BA 12408962
Being 58.8 % removed from NHA
Largest trees retained: 291cm /230cm /224cm
Largest stump: 389cm/381cm/363cm (all blackbutt)
These figures reveal the number of cut trees over 40cm per ha of NHA for 553 is 72. Well above the epl trigger of 30 per ha and makes a mockery of the EPA's claims of 20 per ha. The only way I can see them coming up with this figure is that they have erroneously calculated this figure for the "net area of tract" including the offset areas and non harvest areas in to the calculation. This is a serious mistake by the EPA as the schedule specify's "net harvestable area of compartment" Copy from the poeo act: when carried out otherwise than in a compartment in a timber plantation or on land west of the Great Dividing Range where:(a) at least 20% of the compartment has a slope greater than 18 degrees above or below the horizontal, and(b) at least 30 timber stems (at least 40 centimeters in diameter at breast height) are removed from each hectare of the compartment when averaged over the net harvestable area of the compartment
with this above definition in mind I again assert the following, the basal area calculation under I.F.O.A definition still revolves around the net harvestable area being that the calculation to identifying whether there's been 40 % BA removal is limited to the net harvest area, only, and when you define a "offset area" that it by definition no longer part of the "net harvest area", and as such is not be part of any basal area calculation, so the planed intensity of this operation for 552,553,554 wedding bells of 67% BA has deliberately exceeded the IFOA's allowable harvest intensity to such an extent that it's triggered the schedule of the P.O.E.O, because of the pollution potential of this operation.