nature conservation council of insw inc.

**39 George Street SYDNEY NSW 2000 Ph:** (02) 9247 4206, 9247 2228 **Fax:** (02) 9247 5945 **Email:** nccnsw@peg.apc.org **Internet:** http://www.peg.apc.org/~nccnsw



28.11.96

## To all CRA Forest Campaigners

## **Re: Meeting with Herman Pintos-Lopez**

A meeting has been scheduled with Herman Pintos-Lopez, Yeadon's new senior policy advisor at **11am Monday 16th December** at NCC. Herman has only been working for Yeadon for three weeks and seems especially eager to meet with us.

A 40 minute meeting has also been scheduled with Bob Smith at 2.30pm on the 16.12.96 at NCC.

A nd a meeting has been scheduled with **Robyn Kruk** and **Leanne Wallace at 4pm on the 16.12.96** at NCC.

All these meetings have been arranged so that regional people coming to Sydney for the Forest Summit meeting on the 15.12.96 can hopefully attend these meetings as well.

N.B. All the above people have requested that they are given some idea of the agenda a few days before hand. So if you intend on coming to any of these meetings and have specific issues you'd like to discuss in mind, please let me know by Wednesday 11th December.

Regards.

Elle No

Elke Nagy Forest Networker



20 02 80 00.02

# Final Draft

## PROTOCOL FOR CONSULTATION

### STATE FORESTS AND NORTH EAST FOREST ALLIANCE

#### Preamble:

Since late 1992 successful negotiations between State Forests and the Nambucca Valley Conservation Association (NVCA) on proposed harvesting operations in forest areas considered sensitive by NVCA have occurred.

A basic tenet has been to treat each individual harvesting plan area as a discrete unit with the discussion centred around whether or not NVCA believes harvesting should occur, and if so, how this can be undertaken without conflict.

The resolution of broader questions including, are Brushbox forests really rainforest and catchment values and slopes exceeding 25 degrees etc., are more appropriately resolved outside this protocol due to the broad consequences of these questions.

It is important that every effort is made by all parties to work on the issues, not the people involved. That is, the discussions are about "playing the ball" not "the player". All people must be treated with respect.

It is often possible to avoid conflict in the forest by reaching compromise positions acceptable to both sides.

This protocol applies for all areas for which Harvesting Plans have not been prepared as of the date of signing. Where Harvesting Plans have already been prepared and where time permits limited consultation may occur within the time available.

#### Methodology:

 For 1995, the order of working will be brepared by State Forests on a monthly basis and faxed to the nominated NEFA contact person for each District close to the end of each month in the following format for each District.

1995 Order.of Work	HCV as per latest list	Current Operations	Fully Licensed	Ápproved Since Last Report	Comment
Work	latest list			Report	

If a compartment becomes licensed and it is intended to commence logging in that compartment before the next monthly report would be available, then advice of this intention should be given to the nominated NEFA contact as soon as relevant licences and approvals are confirmed.

2. NEFA representative advises State Forests of the compartment numbers where concerns exist and seeking to be notified when a Harvesting Plan (either draft or final) for those compartments is available. NEFA's notification of the compartments about which concerns exist will be given to SF preferably within 2 weeks of receiving the Order of Works, but no longer than 3 weeks from the time of receiving the Order of Works. (is. SF will only guarantee the minimum 2 weeks

# **Final Draft**

consultation prior to logging beginning if NEFA indicates interest in consultation for a compartment within the 3 week period.)

- 3. If it is known at this stage that logging is not acceptable under any circumstances for any of the compartments the NEFA representative will advise SF in writing. If so, then the process and negotiations end for those compartments but continue as below for the others.
- 4. SF confirm to NEFA representative that the Harvesting Plan will be provided as soon as it is drawn up, advise approximately when that will be and the window of time available for negotiations before logging begins.
- 5. The Harvesting Plan is supplied to NEFA representative with a fixed timetable to respond. This will be a minimum of two weeks and Ideally should be longer. This Harvesting Plan will be supplied free of charge where it is part of a pre harvesting consultation process.
- 6. Due to the time tag involved in obtaining approvals from other organisations, sometimes the Harvesting Plan supplied in Step 5 is labelled final for the purpose of obtaining approvals knowing that any operations which do eventually occur will be at least as sensitive as the supplied plan. In this event, an undertaking is given not to harvest until the expiration of the timetable period. It is acknowledged that the Harvesting Plan sent to other authorities may be amended following the consultation process.
- 7. Background information relevant to the compartment will also be made available on request if there are no legal or commercial reasons or policy directives prohibiting their release. For example, habitat assessment reports, erosion hazard and sediment control strategies, the basis for the Universal Soll Loss Equation, information on or special conditions on the Section 120 Licence from the NPWS, compartment logging histories and any other documents which are relevant and on which the Harvesting Plan relies. This information will be supplied at the normal cost.
- 8. Written response is received from NEFA by the set deadline. If the NEFA response is that no logging is acceptable the negotiations end for that compartment. If not, they continue as below. NEFA understands that SF prefers to know as early in the process as possible if the NEFA response is that no logging is acceptable in the compartment. NEFA will let SF know this as soon as possible.
- Negotiations commence with nominated NEFA representatives and the District Forester and/or his representatives. The negotiations can be held in the District Forestry Office, in the Compartment, in an Environmental Centre or other agreed venue.
- 10. The first round of negotiations may involve some compromise by both parties and/or the correction of misunderstandings.
- 11. There may be follow up work done by State Forests, for example, checking a specific area for alleged incorrect forest typing.
- 12. Follow up joint inspections in the field then may occur to check contentious points and to try to reach agreement in the field about specific issues.

# Final Draft

- 13. Agreement may involve the removal of small discrete areas from the area originally proposed for harvesting and may involve other compromises. Negotiations may require several meetings over a two month period or so.
- 14. Before the end of each meeting where possible and at the last negotiation meeting, the points agreed to are listed with both State Forests and NEFA representatives taking away a copy of the same. If no agreement has been reached that too will be written down and taken away by each party. The copies are signed by all people present.
- 15. The final Harvesting Plan is prepared in line with the agreed list of points and supplied at normal cost to NEFA.
- 16. NEFA accepts in writing the list of points, the final Harvesting Plan that is in line with those points and that harvesting can occur and continue in an unhindered, manner in accordance with the final Harvesting Plan.
- 17. There is a timetable given up front for the above steps based on the date on which harvesting is proposed to commence.
- If consultations are underway under this protocol concerning a compartment before logging begins then NEFA undertakes not to block access for non roading or non logging activities.
- 19. Any agreement made as the result of consultation at District level will not be overridden by Regional staff. If such an agreement is to be overridden by higher authority, the Regional General Manager will notify the relevant NEFA contact before the agreement is broken.
- 20. Break down of the consultation process in one District or in one compartment will not jeopardise consultation in other Districts or other compartments even if protest activities ensue. However, when offices of State Forests are entered beyond public areas and normal work interfered with then State Forests may cancel consultation and agreements as they see fit.
- 21. This process of consultation will continue until 1st January, 1998.

Signed:	Lyn Orrego for North East Forest Alliance	
Signed:	G. King for STATE FORESTS OF NSW (Northern Region)	••••••
Dale:	: 	

→→→ NPA

(1) 7) 17.19

Environment group's forests policy submission to Bob Carr MP leader of the NSW Parliamentary Labour Party 4NPA

This statement has been agreed to by NCC, TEC, ACF, SEFCC, NEFA. The environment groups are seeking a comprehensive revision of ALP forestry policy. The ALP policy should give the following firm undertakings:

1. The ALP's previously announced promises of new national parks and wilderness areas to be reaffirmed and illustrated on maps before the election and all the new areas to be dedicated within the first 12 months of a Carr Labor Government. All NPWS-identified wilderness areas should be gazetted. The attached notes demonstrate that this is possible without major disruptions to the timber industry.

2. The ALP to publicly support the use of Commonwealth World Heritage powers to protect forests adjacent to and in the catchment of World Heritage areas where World Heritage values are threatened.

3. The immediate establishment of a moratorium on logging in all of the high conservation value forest compartments identified by Commonwealth Environment Minister Faulkner. This moratorium is to remain in effect until superseded by the further forest assessment and protection measures set out in {4} below.

4. Immediate establishment of a moratorium on logging in {a} unprotected wilderness areas as identified by the Director-General of National Parks and Wildlife, {b} all remaining areas of unprotected old growth native forest, and {c} forests adjacent to and in the catchment of World Heritage areas whose values are threatened by logging. This moratorium is to remain in effect until the establishment of a comprehensive, adequate and representative reserve system protecting NSW native forest communities.

5. An immediate direction to the NPWS to conduct, in co-operation with ANCA, a rapid assessment of all NSW native forests within a period of six months to identify those additional forest areas likely to be required to secure a comprehensive, adequate and representative reserve system, and forest areas likely to be of World Heritage value. The rationale, process, and methodology for the assessment will be stated at the commencement of the process in an initial report exhibited for public comment. The draft final report with recommendations on forest areas needed for the reserve system will be exhibited for public comment. The recommended areas will be protected from logging by moratorium until the completion of a comprehensive assessment of NSW forests and a decision by the NSW Government

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establishing a comprehensive, adequate and representative system.

6. Establishment within the first three months of a Carr Labor Government of a process for comprehensive assessment of native forests, with the assessment completed for the whole State by March 1997. At the end of the assessment process the Government will dedicate a comprehensive, adequate and representative forest reserve system under legislation in accordance with the recommendations produced by the process. {Note: The structure, membership, control and related aspects of this comprehensive assessment process are covered in Schedule 1.)

7. Establishment within the first three months of a Carr Labor Government, under legislation, of a Forest Practices Review Board charged with establishing a code of practice controlling logging on lands of all tenures and regulating all forestry operations. The FPRB will regulate forestry activities until comprehensive regional assessments have been completed, comprehensive system of reserves established and a comprehensive code of logging practices developed. The FPRB will be responsible for assessing all public and private lands proposed for logging or clearing. The FPRB will determine whether the activity is appropriate and the conditions to be placed upon operations to adequately protect all forest values. [Refer to TI(IP) Act for public exhibition processes).

The draft code of practice is to be exhibited for public comment before adoption. The code of practice is to be fully enforceable by third parties in the Land and Environment Court. The FPRB is to be comprised of representatives of State Forests, NPWS, EPA, Soil Conservation Service, Nature Conservation Council of NSW, CFMEU, Ecological Society of Australia and an independent {non government} chairperson.

8. Retention and full enforcement of all current environmental controls in forest areas where logging is to continue, including stop work orders made under the National Parks and Wildlife Act, environmental impact assessment, fauna impact assessment, soil conservation and pollution controls.

9. An immediate direction to CALM and the Soil Conservation Service to fully resource, implement and enforce all private land clearing and land protection controls. Immediately gazette all ungazetted proposed protected land maps. CaLM, with assistance of the NPWS, is to review all maps and as for as possible identify inadequately reserved plant communities and habitats of endangered plants and animals for inclusion on a revised set of protected land maps to be gazetted by March 1996. As comprehensive regional assessments are completed for each region a final set of maps will be gazetted.

10. Establishment and implementation in the first six months of a Carr Labor Government of a timber industry restructuring program with priority to those areas of the State where the existing timber industry may be affected by the 1995 new national park and wilderness area gazettals. The restructuring program is to be devised by a committee comprising representatives of DoP, Premier's OFFICE, State Forests (pine section), NPWS, two persons nominated by NCC, a nominee of the CFMEU. Local area consultations are to be undertaken. Key elements of the program will include:

- immediate negotiations with the Federal government for funding assistance for timber industry restructuring;
- provision of low conservation value native forest areas to meet transitional needs;
- comprehensive assessment of available resource (particularly pine plantations and native forest regrowth), value adding potential, review of logging quotas, investigation of alternative fibre sources;
- co-ordination of pine industry developments with withdrawal of native forest resources from industry;
- open tendering process for identified forest resources and consultation with local communities prior to allocation;
- government assistance for milling and manufacturing based on small wood;
- government assistance for ecologically sustainable alternative industry and employment projects including those based on value adding, new national parks, ecotourism, local improvement programs;
- government assistance for new hardwood plantation projects;
- government assistance for structural adjustment packages including redundancy payments and acquisition of plant and equipment;
- accounting reforms which separate State Forests native forest and plantation operations, which require both recurrent and capital accounts, and which require any annual operating shortfall to be carried over to the following year.

@ 005/006

11. In keeping with the principle of ecologically sustainable development, the precautionary principle and the commitment to conserve the State's biodiversity, a pledge to phase out export woodchipping based on NSW native forests within the first term of a Carr Labour Government.

#### <u>Schedule 1</u>

#### Guiding principles

- The assessment must be based on a comprehensive and adequate information base and adopt a precautionary approach to identifying conservation requirements.
- The community must be involved at all stages of the regional assessment i.e, in setting the terms of reference, overseeing information collection and reviewing the results.
- The process must be balanced, open and publicly accountable, with all submissions, data, analyses, reports and minutes of meetings publicly available.
- Environment NGOs must be represented on all committees and working groups involved in the regional assessment process.
- The participation of environment NGO's in these committees and working groups must be adequately resourced.
- Environment NGO's must be adequately resources to carry out independent assessment and advocacy at the regional level.
- The National Parks and Wildlife Service must be the lead agency in identifying comprehensive adequate and representative reserve systems and other conservation measures for each region.

#### **Regional Assessment Coordination Committee**

Regionally based committees will be established for each regional assessment. Each Regional Assessment Coordination Committee (RACC) will oversee data collection and analyses and prepare land use plans for each region. RACC's will be comprised of a representative of:

Department Of Planning, National Parks and Wildlife Service, Nature Conservation Council, Ecological Society of Australia, Industry Group, Labor Council. A land management expert from a NSW tertiary institution will be appointed as Chair.

The input of the following Government agencies to be coordinated by the Department of Planning: State Forests, Environmental Protection Authority, NSW Tourism, Department of Water Resources, Department of Mineral Resources, Soil Conservation Service, Commonwealth Dept. of Environment, Sport and Territories, National Parks Association, Local Government.

The work of the RACC will be divided into three principle stages:

Overseeing data collection, data entry into a computer Geographic Information System and data analyses.

Overseeing preparation of draft land use plans for public comment, detailing all data layers, identifying the conservation and cultural values of all lands, providing recommendations for an adequate reserve system, environmental constraints on other lands, areas requiring rehabilitation, areas suitable for plantations and other uses and management constraints required to maintain conservation values.

Preparation of final land use options and submission of options to the Minister for Planning and Environment for ratification.

# Losing 850 years' history in one fell

HERE has been a passionate row on the North Coast over the logging of a small area of forest known as compartment 579 of Wild Cattle Creek. I had a letter asking: "Have you stood beside a tree that was a seedling when Jesus was alive? Well, if you'd like to you had better be quick."

So I went to see. Because of demonstrations, the forest was closed to the public and the entrance was guarded by police. John Ball of Dorrigo State Forests took me in. He showed me everything that I wanted . to see, he answered all my questions fully and freely, he made no attempt to influence my opinion.

Logging began last April. When the first load of logs drove out, North East Forest Alliance blockaded the Grafton office of the National Parks and Wildlife Service whichresponded by modifying the \$120 licence which protects wildlife."

e t

Work had to stop while a search was made for four species of frogs that might be endangered. Spokesmen for Boral, the millers, scathingly announced that work stopped for five months while searchers found one frog. That was not so - it was six individuals of one species, giant barred frogs, the biggest in Australia and rare indeed. They were always confined to a small area and they are now in extreme danger of extinction. So the compulsory protective band along the creeks was broadened.

Logging began again in September. Members and associates of North East Forest Alliance moved in to stop the work. They threatened loggers, rolled logs and rocks on to the tracks, jumped on moving



ERIC ROLLS -vehicles, barricaded bridges and sat

on the barricades

one night, two girls taunted them by dancing naked, then slipping away into the darkness out of reach of arresting hands. One girl chained herself to a "goanna", a steel rod buried deep underground, and stood in a narrow hole dug in the middle of a track with only her head showing above it.

The first truck driver to come along resisted the late Premier Bob Askin's notorious instruction. "Run over the bastards", and called police. They spent five hours digging a trench through gravel and rock to get at the "goanna", only to discover, when they got it out with the attached girl, that she had a snap link in the high tensile chain near her wrist and they could have simply unhooked it and lifted her clear without any digging at all. She was arrested along. with 115 others.

The forest did not grow up with Christ but the oldest tallowwoods might be 850 years old, still an impressive age. The brush box and blue gum, which was also taken, do not live to that age. They were about 400 years old.

The trees are huge, up to 40m tall and 4m diameter at the butt produc-

ing solid logs 14m long and averaging 1.3m in diameter. They reach that size in about 200 years, then they dominate the area around them until the top branches begin to die and. their leaves grow smaller and sparser. giving light for seedlings to germinate. No log smaller than 35cm wide clear of bark in the centre was taken.

The timber is being treated with the respect due to it. Much of it is milled for superb parquetry flooring. as beams for industrial sheds that are so much more durable and fireproof than steel, as cross arms, as frames As police sat round their camp fire . for houses, as show pieces for cabinetmakers.

> THE opposition to the logging came about because it was believed to be an old growth forest and, under the rather hazy rules that the government works to, such a forest is supposed to be sacrosanct

> No one is arguing about the age of the big eucalypts — "I am old" is written all over them. But nobody has made any long-overdue, definitive pronouncement on what constitutes an old growth forest.

Interested bodies work to whatever principle suits them. One definition coming out of Gippsland fixes the minimum area at 80 hectares, old growth in section 579 covers 30 hectares only.

Moreover, according to someone else's estimate, such a forest must have suffered no significant disturbance and this forest was heavily logged for its rainforest timbers at the turn of the century (the bullock tracks still show), for its coachwood during World War II to make rifle butts and struts for Mosquito bombers, for its hoop pine in the 1950s and 1960s.

There is no big coachwood or hoop pine left, all was taken. There



are also varying opinions as to what percentage of the canopy of an old forest can be occupied by the young leaves of regrowth. The Gippsland figure is less than 10 per cent which certainly rules out Wild Cattle Creek.

The forest is in two sections. rainforest in the valleys and wet eucalypt forest on the ridges and slopes. The total area is 161 hectares of which 55 hectares were logged. The 106 hectares excluded from

logging consist of all the rainforest. slopes above 30 degrees and flora and fauna reserves near the creeks.

Sun Horald -20 Nov q'4

The whole exercise was brilliantly done; it was a model of timbergetting. Only 900 trees of the thousands there were taken. Six habitat trees to the hectare were left, enormous trees with hollow branches for wildlife, each marked by the foreman with a big white H, and six recruitment trees marked with white circles to allow for any natural deaths.

O 12 big trees and many young trees were left to the hectare, 16 Nto the hectare were taken. One outstanding tallowwood was on the edge of a flora exclusion. The foreman painted it with parallel lines to indicate that it was an untouchable boundary tree and then, since it was so impressive, he reinforced his lines with a big painted "No".

Should this forest have been logged? No part of a forest should either be logged or left unlogged without a major study by scientists. General rules do not apply, each forest is different, too little is known about any of them. Because of the pressure put upon wildlife by the present drought, by the consequent enormous number of foxes, this work is now more important than it has ever been. Governments, sawmillers, anti-loggers have an enormous amount to learn.

I believe that the logging of compartment 579 has improved the forest for everything in it. That is a complicated story that I will explain in another article. Even so, it is an awe-inspiring thing to watch the story of 800 years disappearing down the road as a dead log.



No forest in Australia is accustomed to looking after itself. For more than 100,000 years they were modified by intelligent humans. Aborigines worked them with fire and constant disruption for small areas of forest.

9100108

standing of our forests that arguments used by opponents to the logging at Wild Cattle Creek State Forest, near Dorrigo on used against the logging, the NSW north coast. were sound reasons the old growth forest should be logged.

expert. They have to be to keep their jobs under stringent conditions. They must direct falling trees away from reserved areas, they have to fell a group of trees with their tops to a central point so that the first one down is the only one that flattens undergrowth, they must avoid knocking limbs off trees that are to be saved and they have to avoid destroying young trees.



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#### ERIC ROLLS

These turn water, into stone axes and there was the forest so that it filters. on its way to the creeks. With reasonable rains. Such is the misunder- regrowth will be fast In 18. months it will be difficult to tell that timbergetters have been in the forest.

One of the arguments which began last April, was a report by the Australian Conservation Foundation of a study The tree fellers are carried out on the catchment for the Thomson Reservoir in Victoria's Central. Gippsland: "Water production from old-growth eucalypts can be twice as much as streamflow from a young regrowth forest."

That is true, but it is a ridiculous argument against logging. There is greater run-off because try with several healthy there are fewer vigorous plants to use the water. If and light understorey so the catchment were they can travel easily. Big They use chainsaws cleared of plants alto- old trees are useless to

Graphic by Edi Sizgoric.

element for them and the statements concerning them reduce the status of conservationists at a time when they need all the authority they can muster.

Koalas like open couneucalypts to the hectare with 90cm blades. First, gether there would be them, not only because



ΙT TAKES TWO.



KOALAS: Not suited to life in an old-growth forest.

they clear an area around the tree to be felled, then they decide where they will drop it, then they clear an escape route at an angle of 45 degrees to the line of fall. For safety they have to be 6m away when the tree hits the ground.

It takes about half-anhour to fell a tree 130cm across at the butt. The first cut is the scarf, a deep cushioning wedge taken out at an angle of 90 degrees to the natural line of fall. Then the logger moves to the back of the tree and makes the felling cut 20cm higher than the scarf.

By leaving what he calls hinges - uncut triangles between the scarf and the felling cut - the logger can twist the tree at any angle up to 45 degrees from the natural line of fall. The tree turns towards the bigger trianele as it tears the uncut" wood. By varying the size of the hinges, they aim these falling monsters with extraordinary accuracy.

The snig tracks were planned so that each log followed the path of the previous one to the loading dump, causing a minimum of disturbance. Once a track was finished with. the bulldozer pushed up cross-banks along it at specified intervals in to life in an old-growth

even more water, though there would be a lot of mud with it. We have to slow down water movement, not increase it. . Water should trickle into streams, not run.

Another argument advanced by a Wild Cattle Creek Flora Reserve Proposal, launched by environmentalist and former Tasmanian MP Bob Brown two months ago, concerns wildlife. T T states: The proposal encompasses L known > or ` expected habitat for some 20 species of endangered animais. The tall, wet, oldgrowth forest and rainforest provides optimal habitat for most of these species and their longterm survival in the area depends upon the retention of these old-growth stands and the other remaining fragments of old growth."

It lists 10 animals that have been found in the area: koala, sooty owl, rufous scrub-bird, parma wallaby, red-legged pademelon, long-nosed potoroo, greater broad-nosed bat, great pipistrelle, tiger quoil and marbled frogmouth. ~~~

Despite the fact that they have been seen there, not one of them is suited coordance with the slope. forest. It is an unnatural

them.

When climbing, koalas throw their arms around the trunk and squeeze inwards. A tree of 60cm in diameter is the biggest they can climb. To scale a brush box with a threemetre trunk would be like trying to climb a brick wall.

Much was made of the presence of the rufous scrub-bird, which is small, reddish-brown, very rare and very difficult to see, though they have a distinctive, loud accelerating call

An officer from National Parks and Wildlife thought he heard one as he drove along one of the tracks, so forest rangers took in a tape player and broadcast the birds' calls. They received good responses - the birds are there.

But what sort of country do they prefer? A favourite habitat was the rainforest bordering those clearings known as grasses in the former big scrub. The birds sheltered in the forest and fed in the thick grass. S Ferrier, who studied the habitat of the birds for the Royal Australasian Ornithologists Union in 1982, reported that selective logging "might lead to. an increase in the density of undergrowth to the benefit of the scrub-bird".

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Despite the excellence of the harvesting of Wild Cattle Creek, woodchipping in north coast forests is a scandalous waste of natural timber. Trees for woodchipping should be grown on land already cleared.

Australia's forests are inordinately precious. Some should be logged, some should be left alone. It is preposterous that we still do not know which is which.



## SHERATON ON THE PARK "WEEKEND ESCAPE' PACKAGE

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ON THE PARK

SHERATON

Dec 94 Der her Rolls wetlands have been ontotondinger your articles on wrong when you cought to wrote provedont foresto (Sun Herald Could '9 ask just a per questions concoming tere estreles . Was it not the action of the NEFA that elected authorities to the presence of the grant barred groops in the givent place the State forests and fark in meeding When yob property much they should have had the area assessed before logging started? Who provided the information that loggers mere threatened by the protestors? Us a visitor & the protest I saw or beard no such evidence and relation between the police and protestors (with minor saception) use cordual to say the least. When the pour monation come from as & the ages brook box grow? Carbon daten of such these in Terenia creek revealed ages of 1200 years plus, [See Doars Doores Commosion & hyung (report) What evidence do you have that the traber is being Weated not the propert due to it? It would be of interest to know what proportion will end up being estported by Eval as woodchips. Small local millers in this area claim what goes through the bool chiffers are not in their "bread and bottop" so multing the property paid "Boral takes point multing preduces and claim their "bread and bottop" so multing workers and claim their "bread and bottop" so multing to one forstop cofficient paid "Boral takes proceeders logs and preduces and claim the Keepers mill takes and loops logs and preduces 2nd class timber Kenpey mill Jakes and class logs and poduces 1st class timber " Where you aware that a Department & Consider as de growth and that report identified comportment 579 reporting on the Domgo EIS had reported the area as having high conservation value. This was that a year before logging started ?? Value. This was that Are you also aware that the prodular value. This was the



CONSULATE-GENERAL OF SPAIN Postal Address: P.O.Box E441, SL James NSW 2000 Streel Address; Level 24, 31 Markel SL Sydney NSW 2000 Tel: (612)-261-2433 Fax: (612) 283-16 95

# Consulado General de España

# VISA REQUIREMENTS FOR AUSTRALIAN PASSPORT HOLDERS:

Holders of Australian passports residing in the States of New South Wales, Queensland, Northern Territory or in New Zealand, who wish to visit Spain must obtain a visa from this Consulate-General.

For tourist or business purposes two types of visas may be obtained:

- Limited visa: This visa allows traveller to enter and remain in Spain for a period of up to 30 days from date of entry. It allows for one or two entries. Entry must be made within 60 days of date of issue. Fee is \$31.20.
- Ordinary visa: This visa allows the traveller to enter and remain in Spain for a period of up to 90 days from ð date of entry. It allows for a maximum of three entries. First entry must be made within 90 days of date of issue. Fcc is \$62.40.

As of 1st July 1994 requirements for the processing of visa applications will be:

73 application forms (per person) duly completed, dated and signed.

3 recent passport size photographs. M

- Current passport, valid for at least 3 months for a limited visa and 6 months for an ordinary visa, from date of application.

- 2 photocopies of return ticket to Australia or, if ticket not yet issued, 2 photocopies of flight itinerary.

- Photocopy of receipt of pre-arranged tour and itinerary OR latest statement of passport holders bank account in Australia.

- For business visas, letter from employer stating length and purpose of trip.

#### NOTES

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- The processing of visas takes approximately 4 working days and in some instances may take longer.
- To avoid delays, all the questions in the application forms must be answered and all documents listed above
- Children under 14 years of age do not require a visa to enter Spain if accompanied by parents. Relatives of European Union (European Economiq Community) passport holders, i.e. spouses, children under .'e
- 21 years of age (living with their parents and at their expense), parents and parents-in-law (living at their expense) muy obtain a visa free of charge, providing they produce the following documents: · Proof of kinship, i.e. full marriage certificate (or "libro de familia"), full birth certificate.
  - Copy of valid European Union member country passport.

Visas by mail: Visa applicants forwarding their documents by mail should supply a stamped sel-addressed envelope or courier bag for the return of their passports.

TRAVEL AGENTS submitting applications for their clients should make sure that all the necessary requirements are completed and payment included to avoid unnecessary delays. Only cheques and money orders will be accepted.

Governmento no the patronal Forest Bling Stehnit (page 11) agreed What with proper assessment have been, completed quest management agencies will avoid actionties that may significantly That are lital to have high concertan velues The looked after the post before the Coming of humano? Surely the complex from of Anotrolic didn't evolve after the Abong mel prople ? arrived MARING you discuss the logging produces but an you diver that the authorities the burn the area to kill off raingprest speares? The you aware that regeneration in some enco 13 600 Have you read the report on old growth proto and water retention . The study was conducted by the Melbourne Metropolitan Board of Warks (not by the ACF) over 20 years and the second showed much better note producto from old growth aprest, \_\_\_\_ That a number of andangered Species of much puted Perealed the highest aboreal manuel population As jour headline of 20 November proclaim Losing 850 years history in the fell" is a very perons decision and despite State Forest claims to the contrary there is less than 5% of old growth forest left. Do you not agree that until proper assessments are made These areas should be evoralled? State Forests are Friting in hursday at an of the state forests are Conducting Environment Impart Studies but when Challenged two have been mithdraw - Dongo and Att Loyal and Wingham modified. The Wanchope-Kayoa Els withington to idantify all the old growth and in the keyoon area

Perth Sydney Melbourne PASSENGER PROFILE TOUR: 1995 Cuba/Guatemala Travel Wise Tour PASSENGER SURNAME. TEDDER ... GIVEN NAME JAMES. TITLE MM. PAVANS acc. via Stuarts Pt. NSW 2441 TELEPHONE: ATH ( )..... 8/H ..... PASSPORT NATIONALITY AUSTRALIAN. DATE OF ISSUE 22 JUNE 1992 CITY OF ISSUE NEWCASTLE ... EXPIRY DATE ... 2002 TRAVEL PREFERENCES SEATING: SMOKING ...... NON SMOKING ..... OTHER Window SPECIAL DIET: VEGETARIAN/VEGAN/DIABETIC/OTHER ..... ARE YOU A MEMBER OF ANY FREQUENT FLYER CLUBS? IF SO PLEASE SPECIFY WITH MEMBERSHIP NUMBER AND APPLICABLE AIRLINE/S NEXT OF KIN SURNAME . TEDDER ...... GIVEN NAME GREGORY. TITLE ... M. ADDRESS Box 60 Cann River iloria 3890 PHONE: A/H 051.586.321....B/H (051).586251

#### ONE WORLD TRAVEL

3rd Floor, 227 Collins Street, Melbourne, Victoria, Australia 3000. Phone: (03) 650 3322 Fax: (03) 650 4254 Toll Free: (008) 337 372 Travel Division of CAA Trading Pty. Ltd. A.C.N. 006 448 291 - wholly owned subsidiary of Community Aid Abroad Licence No. 31384 I.A.T.A. Accredited

Dec 94

As a Boral shareholder I am concerned about the operation of the Company in NE NSW hardwood operates, I have read the green Gold book bet fulladed by the National Accountion of Forest hudristries and Consider Boral is gailing to compare with a number of points bet out in that book bt. What moves the is the carpoing the hudring to set up process plants in this country to deal with wood chips rather than beforting at low prices? I hat hardwoord their that book black Mate hordwood plantation are being sotablished and the economics of set one in the book Bt? We determined if set out in the backlet." I be the company aware that prover in which it has operated in 1994 foost - was identified by a Defortunat of Conservation should him genere beport as lodd growth andlythehabaral Parks Wild Life Sorrece when commenting on the Dorryo EIS as the fogs were taken of your profile mill and it would be of interest to know theat proportion of the logs were publed to Know that fre that the proposition of the the As you will be aware the patronel Forest Blin Stattment (page #) thid That governments agreed that will proper assessments have been completed spest management agencies well avoid ectivities that may allerness been applied to be and and a point prest or wilderness been all avoid ectivities that may hulderness been alle and anot decide that computent, Should be logged do you conside the company ohould not its influence & answer the NFPS is followed? I be is the company concerned only with the profit motive. 66-56 den go poor sorry in the 59' 69 d 6-1010L plan- and Frache cyry

Accomodation Details Fare Claim Please complete and return to Jim asap I require accomodation at the Backpackers on It is your responsibility to pay for your accomodation and any meals I will provide the manager with a list of names. Yes/No •18th ·19th Yes/No 20th Yes/No 21st Yes/No I will be leaving Coffs by plane/train/car on....... and require/do not require transport to station/airport 'I will make my own arrangements with the Manager should I require any meals prepared by the Hostel I note that there may be a charge for the bus trip on Saturday afternoon. ....signature Fare Refund Form I paid.....for transport to and from the Conference and attach the documents (or copies) for a refund of the fare/petrol cost. (We have to account for the grant to DEST hence the need for documentation) • Date.............. signature Official delegate for the Meal at Thay Restourant Sunday evening Cast approximately # / head

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you wish to come

You

YES NO

Vegan



Boral Limited Australian Company Number 000 051 696 20th Floor Norwich House 6-10 O'Connell St Sydney 2000 GPO Box 910 Sydney 2001 Tel: (02) 232 8800 Fax: (02) 233 6605

22 November 1994

Dear Shareholder,

I am pleased to provide you with copies of my Address and the Comments made by the Managing Director, Tony Berg, to the Company's Annual General Meeting held in Sydney on Monday, 14 November 1994.

My Board colleagues and I greatly value the strong support, interest and loyalty of all of our 145,000 shareholders. The Meeting was, as usual, well attended by about 1,200 people. We recognise that most shareholders are unable to attend and we hope this report of the Meeting is helpful to those of you who were not able to be there.

The earnings outlook for the coming year is encouraging based on results from the first quarter. The results of all major divisions have improved and we will benefit by a full year's results from SAGASCO being included.

Questions were asked at the Meeting about the Boral Timber operations in NSW and our forestry practices. Throughout Boral, we recognise the need to protect the environment for sustained long term benefit to the community. As the largest hardwood timber processor in Australia, Boral Timber is firmly committed to proper forest management by:

- >> harvesting only on a sustainable yield basis and operating only in forests where sustained yield is practised. In fact, Boral Timber has agreed to substantial reductions in log allocations over the last eight years to achieve this.
- >> operating strictly in accordance with the National Forest Policy Statement and under the direction of appropriate State Government authorities.

» efficient timber processing in a socially responsible manner.

The hardwood operations in State forests are controlled by State Governments and timber is not obtained without Government approvals confirming that specific trees can be harvested. There are other strict controls. For example, before approvals are granted in NSW, Environmental Impact Statements are prepared by State Forests of NSW and licences are obtained by them from the Environment Protection Authority and in addition, from the National Parks and Wildlife Service where the preservation of wildlife and their habitat is in any way involved. Woodchips are only produced by us from timber in NSW State forests as a by-product

from sawmill residues (which would otherwise be burnt), from silvicultural activities (for example, thinning of re-growth and plantations) and from low-grade logs from integrated harvesting.

For shareholders' information, we are also sending out with this letter "Green Gold", a booklet produced by the National Association of Forest Industries outlining the policies followed for prudent management of Australia's forests. If you have any further questions on Boral's timber activities, we will be pleased to answer them.

There were also a number of questions on the amendments to the Terms and Conditions of the Executive Share Plan and the approval of the acquisition of shares for Tony Berg under the Plan. The changes to the Plan are designed to increase shareholder value through motivating managers. The Plan is being expanded to increase the number of managers participating from under 40 to about 500 and the benefits to be provided are in lieu of cash which would otherwise be payable to the executives. A requirement is that the shares be held on behalf of the executives for not less than 5 years. As the shares subject to the Plan are purchased on the stockmarket and are not new shares issued by the Company, there is no dilution of existing shareholdings from the operation of the Plan. The motions were put to a poll and were both carried with a majority of over 95% of the votes cast.

Elizabeth Alexander, who was appointed by the Board in September 1994, was elected a Director. Don Hughes and Rod Halstead were re-elected to the Board. All of them bring different skills and experience which will continue to be very valuable to your Company. As I mentioned in the Annual Report, I will be retiring from the Board at the end of this month. I am delighted that Peter Cottrell will succeed me as Chairman and I am sure that under his leadership the Company will go from strength to strength.

I would like to thank all shareholders for their interest, support and kindness during my time as Chairman and I wish you an enjoyable holiday period and a profitable and healthy 1995. Boral is a great Company and I look forward to continuing my association as an interested shareholder.

Yours sincerely,

Leslie

Jim Leslie Chairman



Mr JLO Tedder Honorary Secretary North Coast Environment Council Pavans Road Grassy Head via STUARTS POINT NSW 2441 Our Reference: Environment Protection Authority New South Wales

16 APR-1993-

PO Box 1135 Chatswood NSW 2057 Tel .02. 795 5000 'Fax .02. 325 5678

#### Dear Mr Tedder

Your Reference:

I refer to your letter of 26 March 1993 regarding the Environment Protection Authority's (EPA) regulation of forestry operations.

The EPA is committed to providing information to the community on this important matter and the Director-General has decided that the best way to progress it is to arrange a workshop at which the regulatory process can be discussed with community groups such as yours.

The workshop will be held from 1.30 pm to 4.30 pm in the EPA's Training Room 1 (Level 2, Citadel Tower B, 799 Pacific Highway, Chatswood) on Thursday, 29 April and invitations have also been sent seeking one representative each from the Total Environment Centre and the North East Forest Alliance. The Nature Conservation Council will arrange for the attendance of up to six representatives of environment groups under its umbrella. Lunch will be provided at the meeting so please let Yvonne Lazare ([02] 325-5502) know by 22 April whether you (or one other person from your organisation) will be able to attend.

I look forward to a productive discussion.

Yours sincerely

WARWICK FORREST <u>A/Director-General</u>



Secretary: Mr Jim Tedder Pavaans Acc Grassy Head via Stuart Point 2441 NSW

Reply to: Lyn Orrego Vice President PO Box 123 Bowraville 2449 NSW Fax/phone (065) 647808 Home phone (065) 647478 (3/4/94-

Mr Allan Crapp, Operations, Policy and Licensing, Environment Protection Authority, PO Box 1135, Chatswood 2057 NSW

Dear Allan,

#### <u>re: Questions regarding the EPA Discussion Paper on</u> <u>Pollution Control Licenses to State Forests</u>

As per our phone converstion of today I now submit to you in writing our Council's questions on the above discussion paper.

I am helping to prepare our submission on the paper. Our Council is the regional environment group on the north coast. Our membership comprises some 40 local environment groups who have a kien interest in this issue. Thankyou for whatever you can do to help us with the following queries.

1. The discussion paper mentions "general operating conditions derived from the SEMGL's" will go on the general license for each State Forest region. It also states many discretionary aspects "have been removed" (p3) implying these have been-drawn up. Could we please have a copy of these?

2. The EPA will require soil erosion and water pollution control strategies to be prepared by State Forests before a license is issued. Could we please have a copy of the document which details the instructions and requirements to State Forests as to how they should do this and what will constitute an acceptable strategy?

3. State Forests will have to propose their own site specific conditions. Will there be any EPA guidance or requirements regarding these specific conditions or any EPA assessment of whether they are adequate? (This is bearing in mind the EPA, as the license issuing body, is reponsible)

4. Does EPA have the forestry-soil erosion expertise to assess the adequacy of license applications, strategies, specific conditions and to accredit those who seek to prepare the strategies? If not, will they seek it and from where?

5. Does the EPA envisage third parties would be able to appeal to the Land and Environment court against the terms of issued licenses (as license proponents who disagree with the license are permitted to do)? 6. Has the advice of the Department of Conservation and Land Management (CALM) been sought to date on the preparation of the discussion paper, the requirements for adequate soil erosion and water pollution control strategies, or appropriate specific conditions?

7. If not, will CALM's advice be sought on these matters?

8. Will CALM's advice be sought on each application from State Forests for a pollution control license and each strategy submitted?

9. The discussion paper says the size of the area over which a single stategy may be prepared will be up to State Forests to determine but must be generally uniform. Will the EPA set a maximum size so as to ensure the stategy represents a more detailed level of assessment of an area?

10. Will the details of the statewide monitoring program required of State Forests be made public (ie methodology, locations, etc)? And will the results be made public annually?

11. Our Council is seeking information on the effects of sedimentation of waterways on wildlife and humans. Does the EPA have a bibliography of relevant documents they could provide us with to help us in our research? If so could we please have a copy of it?

Thankyou again for any information you can give us in response to these questions. I would appreciate it if you could deal with our request as soon as possible as we need the information to finalise our submission to you on the discussion paper which has a deadline of April 30.

Sincerely,

Fyn. Orre

Lyn Orrego (Vice President)

N'L' NCEC/SEMGE

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#### COMMONWEALTH DEPARTMENT OF PRIMARY INDUSTRIES AND ENERGY

EDMUND BARTON BUILDING, BARTON ACT Postal Address: GPO Box 858, Canberra ACT 2601 Tel: (06) 272 3933 Telex: 62188 Fax; (06) 272 5161

Mr James L.O. Tedder Secretary North Coast Environment Council Pavans Road GRASSY HEAD via STUARTS POINTS NSW 2441

Dear Mr Tedder

Thank you for your letter of 1 March 1991 to Mr Kerin, Minister for Primary Industries and Energy, in which you expressed your concerns over resource security legislation. Your letter has been forwarded to the Minister for Resources, the Hon Alan Griffiths. The Minister has asked me to reply on his behalf.

In response to the concerns of State Governments, industry and the Australian Council of Trade Unions, the Government has been reviewing the merits of and means of providing resource security for the forestry sector, while at the same time ensuring adequate protection of the forest environment and heritage values.

As part of this process, you can be assured that the Government will not be weakening its environmental assessment procedures, or its efforts to protect Australia's natural environment. Indeed, it is looking at ways to improve Government processes to identify and protect environmental values and, conjointly, to facilitate investment in the forest products industry.

The processes the Government has decided to put in place involve the development of bilateral arrangements with States on the assessment of suitable forest regions for long term security. The assessments cover environmental, heritage, cultural, social and economic considerations to ensure the Government has available all the relevant information to create sound, scientifically based decisions. These processes could include complementary State and Commonwealth legislation where requested by States and agreed by the Commonwealth. Importantly, this does not involve any amendment to the Australian Heritage Commission Act. Such amendment is not considered a real or desirable option by this Government.

You may recall that at the recent Special Premiers' Conference in Brisbane, it was agreed that to facilitate much needed investment in the forest products industries, Governments will need to provide a higher level of security to the forestry sector. Through a cooperative approach with the States, it is envisaged that greater attention will be provided to identifying and protecting the forest environment. Similarly, as Australia's trade deficit in forest products is equivalent to 10 per cent of the current account deficit, Governments are concerned to ensure we develop in Australia, a secure, thriving industry adding maximum value to our native forest products.

In that regard, discussions are continuing between Commonwealth Ministers, State Governments and other relevant parties with a view to finalising the appropriate means of ensuring an adequate level of resource security, and a clear set of resource conservation and development regimes to ensure the benefits of Australia's forests are available to all Australians.

Thank you for your interest in this very important matter.

Yours sincerely

Lionel Wood Director Secretariat Forests Branch 7 March 1991

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NSW NATIONAL PARKS AND WILDLIFE SERVICE

Mr Jim Tedder North Coast Environment Council

11 May 1992

Lear Sir/Madam

#### RE: OLD GROWTH FOREST REGIONAL WORKSHOP

The National Parks and Wildlife Service has been contracted by the National Forest Inventory to prepare the design for a systematic inventory for attributes of Old Growth Forest in N.E. New South Wales and S.E. Queensland.

To assist this project a technical workshop will be held at Woody Head on the North Coast on the 25 and 27 May 1992. You are invited to participate in the workshop.

The National Forest Inventory Old Growth Forest Workshop held in May 1991 in Canberra identified the essential features of forest structure and composition requiring measurement in assessment of Old Growth Forests. They will serve as a focus for discussion on inventory methods for the project area at the Woody Head workshop.

The Service has contracted Mr. David Milledge to conduct the workshop and prepare the inventory design. Mr. Milledge is preparing a detailed program for the workshop which will be forwarded in the near future.

The workshop will be held at the Woody Head Field Studies Centre, north of Grafton, commencing at 10:30 am on 26 May and concluding at 3:00 pm on 27 May. Accommodation (sleeping bag required) and meals will be provided.

Northern Region 49 Victoria Street Grafton PO Box 97 Fax: 066 420 619 Tel: 066 420 593.

Head Office 43 Bridge Street Hurstville NSW, Australia PO Box 1967 Hurstville 220 Fax: 02 585 6555 Tel: 02 585 6444

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NAT PARKS NTHN.

I apologise for the short notice of the workshop and I hope you are able to participate.

TOURS SINCE PHLY

Alan-

- Less For <u>elfector</u>,

Jim, Tunchenstand Viala Paga is interested in attending Thave agreed to allow a reversentative of the forest Industry to attend with observer 'status. Options for environment groups are to send an offserver or a participant. The ister would need to be a remain who could confrictute in a technical sense - Violan could centant do 16at cheers Ashing



Sec: Mr Jim Tedder Pavaans Rd Grassy Head via Stuarts Point 2441

Reply to: the undersigned September 23, 1992

The Hon. Garry West MLA, Minister for Forests, Conservation and Lands, Parliament House, Macquarie St., SYDNEY NSW 2000

#### URGENT

Dear Sir,

re: Invitation to support scientific assessment of old growth forests within Wild Cattle Creek State Forest

I write on behalf of our council to urge your open consideration and acceptance of the invitation from the North East Forest Alliance, supported by NCEC, for the Forestry Commission to support and participate in a scientific assessment of old growth forest within Wild Cattle Creek State Forest (see attached copy).

Despite logging continuing in compartment 546, we feel the study is still crucial. We understand a scientific methodology for identifying old growth forests has been agreed to by scientists and community groups yet the Forestry Commission has not applied this nor do they assess areas before logging proceeds. Until this is done the conflict in the forests will continue. Wild Cattle Creek State Forest offers an opportunity to pioneer this type of assessment. If worked out successfully it will be able to be applied in other areas and will be like handing over decisions on controversial areas to the scientific umpire.

We understand the Forestry Commission has available to it the scientific expertise, knowledge and experience of the Victorian methodology to enable these assessments to go ahead. If the Commission says no to the invitation to work with NEFA and others on this project they will be seen by the community as rejecting a viable solution to the longstanding and costly conflict over the forests.

As NEFA, supported by NCEC, are intending to commission this assessment in any case, the Commission will find themselves presented with an independent, scientific report which they will have to take into account anyway. Surely the best option is to co-operate through the whole process by doing it jointly, developing trust, and thus all parties having faith in the outcome.

We urge you to let us know of your willingness to accept the invitation as soon as possible. We view this whole project as vital regardless of the logging program the Forestry Commission is pursuing. Of course, the sooner it is completed the better so that the information can be taken into account in deciding the future logging program.

Our call for this assessment to be done is based on the Commonwealth Resource Assessment Commission (RAC)'s Final Report (March 1992) recommendation for the preparation of comprehensive regional management plans that identify and rank old growth forests in terms of their range of values and the protection of sufficient old growth areas within conservation reserves. RAC says that future possible old growth logging should only occur <u>after</u> this has been done and where no alternative resources exist. (RAC Vol 1. p. 27)

As the Commonwealth Government is recommending these assessments be done and should the NSW Forestry Commission agree we suggest the FC could have a valid claim on the Federal government for funds to carry out the recommendation. It should be noted that the assessment process pioneered in Victoria maps all forests by growth stages and thus will also serve to assess and locate timber resources.

Thank you for considering our comments and request. It is our sincere attempt to resolve this conflict for the benefit of all parties and our unique Australian heritage, our old growth forests. We await your considered response.

Sincerely, Lyn prrego Vice President

Reply to: Lyn Orrego P.O. Box 123 Bowraville 2449 NSW

attachments: 2 pages

fle: WG Greek. TZe



Building 2 423 Pennant Hills Road Pennant Hills, N.S.W. 2120

12th October, 1992

Ms Lyn Orrego PO Box 123 Bowraville NSW 2449

Dear Ms Orrego,

Further to my letter of 24th September, 1992, I have now had an opportunity to consider your proposal inviting the Forestry Commission to participate in an assessment of old growth structural characteristics within Wild Cattle Creek State Forest.

The forests of Wild Cattle Creek State Forest and the other Crown timber lands of the Dorrigo Management Area are the subject of an Environmental Impact Statement (EIS) which describes the impact of forest management on all forests values.

In the preparation of this EIS the consultants have reviewed the available information on the flora and fauna values of logged and unlogged forest and considered the adequacy of existing conservation resources at a regional scale. At this time, the Forestry Commission does not support further studies in the Management Area outside this process.

The EIS will be on public exhibition shortly and the public will be able to make submissions on the information presented. The NCEC will have the opportunity to have input on the assessments undertaken within the EIS process.

Yours sincerely

Succes

JOHN HALKETT General Manager, Forest Planning and Environment



The Secretary, North Coast Environment Council Inc Pavans Rd, Grassy Head, NSW 2441

8 Feb 1993

The Director, Mr JW Gillooly, National Parks & Wildlife Service, Head Office, PO Box 1967, Hurstville 2220.

Dear Sir,

re: Submission of Fauna Impact Statement for Mistake State Forest

The NCEC finds this FIS totally inadequate, as it is deficient in its compliance with the requirements of the NPWS Director's letter in the FIS Appendix 2.

The data from which Mr Webster draws his conclusions on the impact (or more correctly the lack of it) of logging on the fauna Mistake State Forest is virtually non-existent.

Binns (1988) spent four days in Mistake SF, visiting only 4 compartments where he undertook four spotlight surveys over three nights, recording 10 Greater Gliders, 1 Yellow-bellied Glider, 2 Mountain Possums and 1 Ring-tailed Possum in total. He gave opportunistic recordings of 10 species of reptiles and amphibians and one of Wompoo Pigeons. This was the total result of his fauna survey work. He spent most of the four days on flora work.

Milledge (1988) spent nine days in Mistake SF but only investigated three sites all of which were located in rainforest and spent most of his time in rainforest.

Webster (1992) spent three days in Mistake SF. He calls it a survey yet admits it "consisted of opportunistic sightings throughout Mistake SF" and that windy weather on the middle day and night: "made location of fauna difficult" [FIS p2]. And that is the sum total of the information given about methodology of his survey. Was it replicated as required? No trap numbers or configurations were given as required nor map of sites or explanation of their selection as sampling a range of different vegetation types, altitude and geology as required. He even states that with all three studies combined (16 days) "most forest types within the forest have been visited, not <u>all</u> as required. He seems to admit to not doing a comprehensive fauna survey in accordance with accepted EIS methodology by saying it will be done in the future as part of the Urunga EIS process. His conclusions concerning the impacts of logging on endangered species are frankly unbelievable, given the scanty knowledge of them in Mistake State Forest.

His mitigating requirement, of leaving three habitat trees per hectare, treats each hollow-dependent animal in isolation as if it was the only one using them. It does not take into consideration the territorial nature of most animals, especially birds, and in particular the Greater Glider. Referring to the species list in the FIS, (which is incomplete in our opinion) there are 17 species of hollow-dependent birds and mammals (excluding bats) and another 17 species of bats - most of which are hollow-dependent also. These are all expected to be satisfied by three habitat trees per hectare. Could any ecologist honestly say that this is sufficient?

One glaring omission on the species list is the Powerful Owl - Ninox strenua - which is almost certain to be present in Mistake SF. It has been sighted in the nearby Nambucca SF. The interdependence of one species on another is not taken into consideration in predicting the impacts of logging. For example, the reduction of a prey species would have an impact on the predator over and above the direct impact on it from logging.

Webster's treatment of the effect of feral animals on native species was superficial in the extreme. To say that because no permanent roads would be made, but only temporary logging tracks "the spread of feral animals in Mistake SF is unlikely to increase" is almost a criminal statement given the publicity feral animals are receiving lately. I have walked along 20-year-old snig tracks with relative ease. A dog or fox would have no trouble on even a heavily overgrown one. These tracks are compacted and/or subject to erosion, which inhibits regeneration, and since the Forestry Commission does not regenerate them they never return to forest. These tracks therefore remain as access roads for feral animals for many decades.

No mention is made in the FIS of the impact of foxes, dogs or cats on the populations of the Long-nosed Potoroo and Parma Wallaby, let alone all the other small ground-dwelling mammals, birds, reptiles and amphibians.

His treatment of wilderness is nothing short of breath-taking. Since there are no present Wilderness Nominations over the area then according to Mr Webster, there is no wilderness there! Is it not his requirement to give an ecologist's opinion of the situation?

There are other glaring deficiencies in this FIS, but these alone are adequate, in our opinion, to judge this FIS at totally inadequate, and useless for the purpose for which it was produced.

Before the FC's licence is renewed, a comprehensive fauna survey must be done to establish what species are actually present and in what numbers. This would enable realistic assessments of the impact of logging to be done by a competent and independent ecologist. A moratorium on all logging in Mistake SF should take place until this survey and assessment is completed.

I hope you will take notice of our comments, and take the appropriate action to protect the native wildlife of Mistake State Forest. For too long, the fauna of our state forests has been treated as dispensable. Until strong measures are taken to protect what is left, it is certain that we will continue to see the extinction of more and more species.

Youn's sincerely, For Lyn Orrego

Lyn Orrégo Vice President NCEC



NSW NATIONAL PARKS AND WILDLIFE SERVICE

Mr J Tedder Hon Secretary North Coast Environment Council Pavans Road GRASSY HEAD VIA STUART'S POINT 2441

Our reference: Your reference:

26 March 1993

Dear Mr Tedder

#### GLEN INNES FOREST MANAGEMENT AREA -FAUNA IMPACT<sup>\*</sup>STATEMENT.

Receipt is acknowledged of your submission in regard to the abovementioned Fauna Impact Statement.

Please be assured that your views will be considered before a decision on this matter is made.

Yours faithfully

W J Gillooly Director

> Head Office 43 Bridge Street Hurstville NSW Australia PO Box 1967 Hurstville 2220 Fax: (02) 585 6555 Tel: (02) 585 6444

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29 Jannan, 1993

TheManager Environmental Assessments Forestry Commission Locked Bag 23 Pennant Hills 2120

Submission on EIS for GLEN INNES Management Area

The North Coast Environment Council Inc. is an umbrella group for forty conservation organisations between the Tweed and Newcastle and east of the New England Highway. The Council was established sixteen years ago for, among other purposes, to seek better management of the native forests.

The draft EIS for the Glen Innes Management Area does not contribute in any major way to setting better standards for improving management and conservation of the diminishing resource of native forests.

There have been several notable developments over the past few years in the study of Australia,s forests and timber needs and how these can be met. The EIS for Glen Innes appears to pay scant attention to these reports or to the changing attitudes of the community towards timber use and the other values of the native forests. Various inquiries have highlighted changes in the timber industry both in the supply and demand sides. There is an increasing role to be played by plantation timber in the supply of both hardwood and softwood . The role of tourism has not been mentioned.

Changes are occurring throughout industry and the community and values are changing. As the population becomes more urbanised and the forests more intensively used for wood production so the pressure mounts for reserving what remains of old growth forest and wilderness areas. The EIS fails to acknowledge these changes and in the opinion of this Council the document is quite inadequate and should be rejected.

In December 1992 the Australian Governments except for Tasmania signed the National Forest Policy Statement. This obligates the signatories to implement , as a matter of priority , the policies in the Statement for the benefit of present and future generations.

One of these policies is that the Governments have agreed to a strategy designed to conserve and manage old growth forests and wilderness as part of the reserve system. The Statement (pages 11 and 12) goes on to explain how this will be achieved. Even though the Statement had not been signed before the EIS was issued the Forestry Commission must have been aware that the issue of old growth forests and wilderness was on the agenda.

The EIS for Glen Innes fails to make provision for the protection of the old growth forests and has ignored wilderness values. In fact it targets some of what may be some of the most valuable old growth forest in the areas of Curramore west of Washpool National Park ; Gibralter Range

#### \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

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COUNCIL REJECTS GOVERNMENT'S \$1 MILLION GREEN POINT OFFER

Lake Macquarie Council had cost the region its chance of a 180 hectare regional bushland park by refusing to accept a \$1 million offer from the Government to acquire an area of the Green Point Estate, the Minister for Planning and Housing, Robert Webster, said today.

Mr Webster<sup>1</sup> said the Government was now forced to vithdrav the offer following Council's decision to renege on a previous agreement to accept the money which it had made in January, 1991.

Sept 18

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#### COURT REJECTS LEICHHARDT'S PLANNING OBJECTIONS

The Minister for Planning and Housing, Robert Webster, said he was delighted with today's court decision quashing Leichhardt Council's objections to the State Government's urban consolidation plans.

The decision by Justice Pearlman, Chief Judge of the Land and Environment Court, was in response to a recent challenge by Leichhardt Council over the rezoning for medium density housing of four industrial sites in Balmain.

"Today's decision is a victory for urban consolidation and the Government's right to slow the extent of the urban sprawl," Mr Webster said.

Sept 18

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and in the London Bridge area . The fact that there are wilderness proposals for some of the area covered by the EIS has been ignored

There needs to be proper socio-economic studies to determine the 1. costs of timber extraction from some of the areas proposed as compared to obtaining timber supplies from other sources

2. the cost/benefits of providing employment in other forest activities such as more intensive management of re-growth forests and plantation establishment 3. the value of tourism through the provision of wilderness areas and more national parks. eg the Binghi area is noted for its rare and endangered flora and as such has possibly a greater value as a reserve than in timber production.

There needs to be at the very least an embargo on logging of any compartment which may have old growth characteristics or which may come within a proposed wilderness area until a proper assessment is made under the terms of the National Forestry Policy.

This EIS is cast in the same vein as previous studies. It is incomplete; it is inaccurate ; it views the forests solely from a timber production viewpoint ; and it is, in light of the National Forest Policy, very out of date and contrary to the NSW Government policy set by the signing of the Statement.

Therefore this Council urges the Department to reject the EIS as inadequate for decision making as to the future of the forests of the Department area, and counter to the intentions of Government. Glachance

James L.O.Tedder Hon.Sec.

#### nevs ... 2

The Commissioners have recommended that the vestern half of the site be exempted from mining to protect areas of significant conservation value, including vetlands. They have recommended that the previously mined and disturbed eastern part of the site could be mined, then rehabilitated using modern techniques to a higher standard than its present condition.

Sept 10

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PLANNING BOOST FROM STATE BUDGET

The Department of Planning has been allocated \$40.2 million in the NSW Budget, the Minister for Planning and Housing, Robert Webster, said today.

The Budget allocation includes \$6.7 million for funding of the Area Assistance Schemes. This is in addition to the \$1.2 million "pick up" funding announced by the Minister which assures the future of high need projects.

The Budget also includes \$3.5 million for the acquisition of coastal land, reserved in the Coastal Land Protection Scheme.

In addition to the \$40.2 million allocation the Department vill administer \$19.4 million from the Sydney Region Development Fund and \$2.7 million from the Heritage Conservation Fund.

Sept 15

#### GRAFTON MAIN STREET CO-ORDINATOR APPOINTED

The Minister for Planning and Housing, Robert Webster, announced today that well known local identity, Lynette Clarke, has been appointed Grafton's Main Street Coordinator.

Mr Webster said Ms Clarke's appointment would greatly benefit Grafton's program.

"Ms Clarke has lived in Grafton all her life and is keen to see the Main Street Program succeed. Her experience and enthusiasm vill provide the committee and the community vith a strong leader," Mr Webster said.

Sept 16.


### **Richard Jones** Member of the Legislative Council

Parliament House, Macquarie St, SYDNEY, NSW, 2000. ph. (02) 230 2858

25th May 1994.

Mr James LO Tedder Honorary Secretary NORTH COAST ENVIRONMENT COUNCIL INC Pavan's Road Grassy Head YARRAHAPPINI VIA STUART'S POINT NSW 2441

Dear Jim,

Many thanks for the North Coast Environment Council submission on the EPA Discussion Paper. I'll have a good look at this.

Many thanks for keeping me up to date.

Best wishes,

Yours sincerely,

HARD JONES. RIC

Printed on 100% Recycled Non de-inked Paper. Save Native Forests. Australian Democrats - Caring for You and Your Environment

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NAMBUCCA VAL CONS. ASSOC. 065 647808 THEIR NATURAL STATE - SEL KNIMALS BELIEVED TO BE EXTINCT EXPERIENCE THE EARTH, SUN, MOON AND STARS IN THE WILD LEARN TO SURVIVE AND LEARN TECHNIQUES WHICH HELP SAVE THE PLANET

Location I (see map)

### p) LEARN ABOUT YOUR IMPACT ON THE ECOSYSTEM DIRECTLY ALL FOR FREE LITTLE WONDER and the MISTAKE

One of the last Coastal ecosystem areas still intact in the entire eastern half of Gonwana. Halfway between Sydney and Brisbane, these two adjoining forests support DOZENS of endangered species of mammals, reptiles, amphibians, birds and plants. Unfortunately, Licences to Kill these creatures have been granted to forest killers working for transnational juggernaughts - by the National Parks and Wildlife Service. Licenses to Pollute Waterways have been granted them by the Dept of Conservation and Land Management. So it's up and bushwalking thorough beatiful and idyllic rainforests and finding endangered animals and plants and documenting them. Using this and a number of other peaceful techniques we can stop the destruction of these last intact coastal subtropical forests - with your help - before April Fool's Day, when logging is due to commence without an Environmental Impact Statement. Camps are already operating and need you NOW.

L(nation 2

W.LD CATTLE ( PEEK

This high conservation value highland forest is under immanent threat. Local crew have beenstruggling against all odds for years, but now the tide has turned. Here a local mill burned itself down last year for insurance and tried (unsuccesfully) to blame the 'Green es'. Now they want to sell off the last old growth on the Scarpment to other towns. Here, not enen the local economy will profit from the toral destriction of its bioregion.

CAMP - 018 672 044

EAST GYPPSLAND SEASON ENDING

The last intact wild forests in mainland south-east Gondwana, stretching from the mountains to the sea. Woodchipping them has commenced and ongoing actions are continuing. Destruction here is taking place on a buly humungous scale. The same juggernauts responsible for the near-comfete destruction of the south-east for issts of NSW over the last decade have moved across the southern border. A most nothing remains after only a decade of woodchipping in the South East of NSW. East Gyppsland is Victoria's last large forest ecosystem and is full of DOZENS of endangered species and is going fast.

Cintact: (051) 540 156, (054) 241 399, (018) 597 139

# - EAST GIPPSLAND FOREST ALLIANCE GOONGERAH VICTORIA 3888

SIOWAWAYS

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N.3 : All convicts please note that most environment centres have arranged for Community Service to be channelled to tree planting and other global rehabilitation projects in local areas.





# Bureaucratic Conservation

Grants to peak environmental organisations, initiated by the Whitlam Government, were seen as a measure which would partly redress the imbalance of the resources available to them, as compared with those of development interests. The grants may, however, have initiated bureaucratic growth rather than enhanced the campaigning effectiveness of the favoured organisations. In the Feb.May issue of the Total Environment Centre's Newsletter, Milo Dunphy writes:

'Perhaps the Government departments' substitution of a soft environment agenda for hard issues has finally captured the public mind. Tree planting, landcare, ESD are much safer political topics than stopping the beachminers at Shoalwater, the woodchippers at Eden or cancelling the proposed munitions depot at Jervis Bay.

'Are the economic rationalists right? Are jobs and the economy far more important than the environment? Or is it the fault in the environment movement itself?

'When Whitlam was elected in 1972 there was an obvious case for small Federal grants to one or two major environment groups in each state. The grants enabled the societies to translate from part-time voluntary groups to fulltime professional/voluntary organisations. The Government's idea was that

... continued from last page

cial question of principle - why should the public be made to pay for the use of its own land? The answer might be that the public should be required to pay for the management of its land, an answer which invokes a double standard. There is no charge for the use of urban parks, though they represent Sbillions in real estate value and a vast management outlay. National Parks fulfil the same function of making open space available to the public, a very desirable amenity for those who cannot afford to own any open space. The Government's program for making money in parks accords with its policy of cashing in on public assets.

the grants would service the grass roots movement.

'But in 1993 the offices are becoming self-serving. Sums once beyond the movement's dreams are swallowed up in office costs, overheads and academic exercises like ESD.

'The professional fundraisers advising the peak groups harp on the need for 'profile' to keep the money flowing.

'Maximising individual group profiles inhibits collaboration between groups and hence the mobilisation of the whole movement and the voting power it represents.

'There is a tendency by paid staff in the peak groups to regard grass roots organisations and membership as milch cows. A member's task is to cough upperhaps six times a year.

'Understandingly the grass roots societies and members think the full time offices of the peak groups can handle the politicians and the big issues.

'The few hundred full-time paid staff of the major environmental groups around Australia are frantically increasing their output of documents, submissions to inquiries and meetings with ministers and departmental officers.

'But the politicians are watching the growing gap in the movement's organisation. They know a few hundred staff members can't win the resources struggle of Australia, by themselves.'

**Donations** 

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We gratefully acknowledge donations from the following supporters during the half year ended June 30th. J.T. Aiken, J. Ambler, V. Attenbrow, L. Berkeley, G. Bolton, D.J. Bowman M.P., C.O. Boyd, P.E. Boyd, J.W. Brown, I.D. Bryant, The Budawang Committee, C. Cadzow, R.O. Chalmers, E.A. Chapman Wade, Coast and Mountain Walkers, M. Colless, A.G. Colley, A. Coote, D.M.R. Coward, E. Cunningham, J. Dillon, A.E. Dixon, R.A. Duncan, M. Ellwood, H. Gold, L.A.J. Hamill, E. Hanvin, P.B. Haydon, G.E. Heinsohn, M. Hillsmith, J. Holly, M.J. Holmes, D.C. Johnson, L. Jones, G.F. Kallir, A.J. Keen, H.A. Kilby, P.G. Kodela, G.W. Lawrence, C.J. Lubbers, J.G. Marsden, J. O'Reilly, M. Phillips, J.H. Pratt, J.L. Rentoul, R. Rickert, M. Rodd, J. Scarsbrook, G. Sefton, F.E. Smith, P. Tafe, Upper Blue Mountains Conservation Society, M.J. White, J. Williamson, J.D. Wrigley,

In addition the following have made donations to the Australian Conservation Foundation enabling the ACF to make grants to our organisation, or have donated to the National Parks Association of NSW's Colong Foundation Project: Mr. & Mrs. C. Austin, J. Barnard, J. Beck, C.G. Benjamin, J.W. Blanche, D. Butler, M. Cawte, R.J. Conaghan, G. Cox, J. Howell, P.G. Laird, J. Lawler, J. Mayer, B. Meek, P. Millard, G. Orr, M. Plumridge, J. Simons, S. Stevens, L. Sullivan, J.J. Veevers.

Paying Loggers To Wreck Forests

The Forestry Commission has generated a nearly \$2 million debt between 1985 and 1991 by its subsidisation of private logging in the Narooma Management Area (which incorporates the eastern part of the Deua), according to 1992 research by Macquarie University economist Dr John Formby.

The Forestry Commission is selling off our forests to the loggers at such low prices that they're not even covering costs.

This cheap wood is a direct subsidy to the industry, on top of the subsidy in the form of logging roads and inadequate supervision by the Commission.

The bottom line is that we pay the loggers to wreck our forests. This situation has been documented independently by the Resource Assessment Commission.

The Wilderness Society, quoted in the NPA (ACT) Bulletin June 1993.

# Blue Mountains National Park Extensions

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### by George Threifo

During 1988, Blue Mountains City Council (BMCC) supported the concept of transferring various Crown Reserves under its care, control and management to the Blue Mountains National Park. A joint study was done by BMCC; the National Parks and Wildlife Service and the Lands Department. Local environmentalists did not have a prominent role in discussions, nevertheless they agreed with the areas listed (limited as they were). The lands in question stretch from Mt Wilson, Blackheath and Katoomba down to Glenbrook.

The subsequent report was buried for the next four years by the State Government. Upon leaving the Blue Mountains National Park Advisory Committee, 1 finally was able to obtain a copy of the report. The report has now been provided to the State Opposition Leader, the Hon. Bob Carr, who publicly endorsed it recently at a meeting in Katoomba.

The current local member, Mr Barry Morris, criticised Mr Carr's action. He has been aware of the report for some time and his Party has obviously ignored it.

We should publicly encourage individuals and groups to nominate other areas for inclusion in the National Park, as the report omits large areas (e.g. Sassafras Creek and Florabella Pass). Those areas already identified are either Reserves or tragments of Crown Land adjacent to the Park.

l am preparing a case for the inclusion of various Crown Reserves, Crown lands and limited private lands along the Eastern Escarpment between The Bluff (at Glenbrook) and Hawkesbury Lookout (at Winnalee). This is being done in co-operation with the local member for Penrith Ms Faye Lo Po.

### Meeting Dates :

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Meetings will be held on July 29th, August 12th and 26th and September 9th and 23rd.

# Making Money In Parks

The 1991-2 report of the National Parks and Wildlife Service describes the mission of the Service as being to 'conserve, protect and manage the State's natural and cultural heritage'. Management should therefore be for the purpose of conservation. Not so. Management is to be for profit. The NPWS is seeking a business team to advise it on the development of business opportunity to secure the best commercial rates of return for its service.

Several attempts have already been made to market the Service's real estate. One was the proposed \$1.5 million 100 seat restaurant and viewing platform to be built at the top of Fitzroy Falls, a proposal fortunately vetoed by Tim Moore. One of the most blatant commercial developments was the leasing of a prime site on the waterline of Middle Harbour in Garigal National Park, Tim Moore approved a 100 seat function centre, boat and bike hire facilities, a caretaker's residence and an information outlet. All but two of these activities (public toilets and information centre) are unrelated to the purpose of national parks. The building is now nearly completé and is the only substantial intrusion on an otherwise unspoiled section of Middle Harbour. When the Willoughby City and Kuringai Municipals took the matter to the Land and Environment Court with the aim of stopping the project, all work was halted until a proper environment assessment had been done. In his judgment Justice Stein found that:

'Both the Davidson SRA Trust (responsible for the area when the lease was approved) and the then Minister Tim Moore did not fully consider the environmental effects of the development. Both were in breach of the Environmental Planning and Assessment Act. The use of the land for private catered functions (such as weddings) would exclude the public. This is contrary to the National Parks and Wildlife Act which requires that the land be used for public recreation and enjoyment.' Justice Stein also commented that 'Erosions (of the dominant purpose of national parks), however small they may seem individually, have the capacity on a cumulative basis to drift imperceptibly towards commercialisation of activities within parks, and this may have the inevitable effect of limiting the enjoyment and recreation of the public at large...national parks are held by the State for the enjoyment of citizen, including future generations'.

Another development has now surfaced after secret negotiations (as was the case with Garigal) extending over the last two years. It is for the lease of Bantry Bay to the Sydney Church of England Girls Grammar School for a sea school with overnight accommodation. The lessees have indicated their willingness to invest some \$2 million for a lease. The term of the lease has not yet been determined, but if the Akuna Bay precedent is followed it would be for 20 years. The area would be closed to the public for only 361 days of the year, leaving four days for their enjoyment of the park.

The commercial development of NPWS policy was expressed by Acting Director Alastair Howard who said: 'NPWS is committed to investigate its commercial potential to increase funding for its natural and cultural heritage activities." (Financial Review 20/5/98). Mr Howard's statement accords with recommendation 5 of the Public Accounts Committee Report which is 'that the NPWS adopt a strategy of basing the growth of its commercial function on established programs such as concessions and leasing corporate sponsorship, NPWS shops and collection of park use fees, whilst allowing for new commercial programs which may prove to be environmentally and financially sound'.

There is no way in which buildings in parks can be environmentally sound, as the development of Kosciusko NP proves. Nor did the PAC address a cru-

continued on next page ...

AUSTRALIAN HERITAGE COMMISSION

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TWO NEW AUSTRALIAN HERITAGE COMMISSION BIBLIOGRAPHIES

THE FORESTS OF SOUTH-WEST WESTERN AUSTRALIA (containing 781 annotated references)

### AND

THE FORESTS OF THE CENTRAL HIGHLANDS AND EAST GIPPSLAND, VICTORIA (containing 580 annotated references)

The Australian Heritage Commission is assessing three important native forest regions - South-west Western Australia, and the Central Highlands and East Gippsland in Victoria - for their National Estate values.

In association with this work the Commission has produced two new bibliographics

The bibliographies provide useful summaries of references to the cultural and natural values of the forests and provide a better understanding of why these places should be documented and conserved.

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Minimum total mail order sale for credit cards is \$10.00.	DS 44	
AUSTRALIAN GOVERNMENT	PUBLISHING SERVICE	

URGENT The 10 . NCC f.a. S. Cork-4 From NCEC J. Teddes 5 May Date Pollution Control hecences - dropt submossion Checked by h. Orrego & self. Recommend the following alteration Use State Forests valter than FCNSW throughout Add in \$ ara 5 "additional patine..... need for none research on adverse effects of follution on aquatic environment - not just fish Þ5. pora 8 - mout correct names Þ. 6 upper limit of 300 ha - agreed þ. 7 p. 8. line 16 specifically address susting Catchment Gronon most question on following lines "How much will cost of preasures have a bearing an practicality ? Will State Forests pay it is too separate to do He right Hong ? What will be EPA approach to such statements ? " p. 11 line & "OG forests or wilderess or proposed willings areas or areas offer 25° (due to their prostruity) # para 5. Add something to the effect that "S.F. forvesting planse should include ate specific conditions from the housence". This requirement would move contractors were sware of all conditions inforded to prevent erosion and contain moof " P. 18

SUMMARY OF SUBMISSIONS AND HEARINGS

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RURAL ENVIRONMENTAL STUDY AS EXHIBITED BY THE COUNCIL OF THE SHIRE OF NAMBUCCA

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Submission Humber	Person Making Submission/ Representation, Name and Address	Details of Submission Land Description - Submission and Reasons	Council's Consideration and Decision
PRIVATE 1,46	Address	32.0 VILLAGE EXPANSION (continued) mentioned above have superseded portions 7 and 88 as a result of subdivision activity over the years. Broadly, the study recommends that those parts of the property below the 1 in 100 years flood level be subjected to an environmental protection zone. That a buffer, presumably an open space buffer from between 100 and 250 metres wide be created above the 1 in 100 year flood level. The residue of the property not affected by flooding or the buffer is proposed for village expansion. It is further recommended by the study that the land proposed for village expansion not be subjected to any rezoning in the immed- iate future and that development consents within this area be withheld until sewerage is available to the property. In addition to the abovementioned recommendations, the study details existing and likely future populations of the Valla Beach Village. Whilst our Client Company does not object to the broad thrust of the study recommendations, they do however question some of the detailed implications of the recomments and requests with regard to the study : 1	and Decision
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produced or likely to be produced by water (ALM whech licences add "I not will EPA require. "protocled " londs to obtain a licence on the com-way as S.F. NCEC considers aperations on private." "land should be licenced" include demucal composition para 3 p. 16 Þ. 18 pare 1 format of report add " rainfall readings on the week leading up to the event " action the beam or proposed to aneliorate the event " p. 19 para 1 " that this Franning include basic information to He fublic on how to identify pollution "

p. 20 as par p. 18 para 1 see additional momentia

No spelling / typing orrors lave been corrected.

## SUMMARY OF SUBMISSIONS AND HEARINGS'

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# RURAL ENVIRONMENTAL STUDY AS EXHIBITED BY THE COUNCIL OF THE SHIRE OF NAMBUCCA

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Submission Number	Person Making Submission/ Representation, Name and Address	Details of Submission Land Description - Submission and Reasons	Council's Consideration and Decision	
PRIVATE 1,45	W.R. & F.B. Hughes	32.0 VILLAGE EXPANSION (continued)		
	-	The small land area for example in Lot 41, D.P. 619047, is not conducive to any economically viable agricultural pursuit.		
	· ·	That portion of lot 41 which is free of the 1:100 flood encumbrance is we believe ideally suited to a continuance of the ribbon style development already allowed adjacent to Wilson Road.		
		Why does the proposed eastern boundary of the areas marked for potential village expansion not extend back to the Wilson Road?		
	•	Why does it not for example, follow the boundaries of the marked road on lot 166 with a southern boundary at the southern end of portion 29.		
		Turning now to the map on page 132 it would appear from our view of the location of lot 41 in this presentaiton that given our land is pocketed and surrounded by areas allowing for small and medium lot rural residential areas. The delineation of "proposed agricultural protection" zones in proximity and including lot 41 is we believe discriminatory of our position and not based on logical, economic,		
		agricultural or environmental factors.		
		We protest the proposed potential boundaries for village expansion of Bowraville and the proposed zoning of lot 41 in D.P. 619047.		
PRIVATE 146	Messrs. King & Campbell Pty. Ltd.,			
R.0 .	P.O. Box 243, Port Macquarie. 2444.	Re: Land Owned by Australian Recreation Limited at Valla Beach. We act for Australian Recreation Limited who are currently the registered		
		proprietors of lots 1 and 2 in deposited plan 581794, lot 3 in deposited plan 512170, lots 1-34, 36-44, 46-87, 90-104 inclusive in deposited plan 228703, lot 1 in deposited plan 529828 and Portion 132 in the Parish of Valley Valley, County of Raleigh. The abovementioned study generally refers to the land as Portions 7 and 132 and part of portion 88. The various deposited plans		
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MTE: 4-5-94 11 Pages THE WILDERNESS JOCIETY TO: Lyn Orrego follow ATT: Toohey Submission EPA Poll Ctrl Lid OFFICE 141 ST 10 HERITAGE CENTRE 90 HUNTER STREET NEW CASTLE \$300 TELETHONE 049 294 395 FAUSD III E 049 295 910 SHOP 50 HE NTER STREET NEWPASTLE 2510 TELEPHONE IN 1263 909 10.9 0+6562670 SM1 87:01 ∂⊄ MED

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CONFIDENTIAL ..... 3/5/94 [JRC 11:\NCEC\LIC2POLL:TIT] draft two 3/5/1994 [jrc:Ii\ncac\lic2poll.epa] < on NORTH COAST ENVIRONMENT COUNCIL letterhead . 0. SUMMARY (next draft!)  $\mathbf{ro}$ : etterhend Submissions - Forestry Licences, INTRODUCTION TWS. Environment Protection Authority, The North Coast Environment Council Inc is the regional umbrella Waters and Catchments Branch, organisation for the north coast of NSW. Established for 18 Cocked Bag 1502 years, the Council, or NCEC as it's sometimes known, has over 40 BANKSTOWN NSW 2200 local member conservation and environment groups. TWS MCEC congratulates EPA for recognising that "soil erosion caused SUBMISSION ON from forestry operations can be a significant source of water pollution" and for addressing this important issue through the N.S.W. ENVIRONMENT PROTECTION AUTHORITY (EPA) DISCUSSION PAPER release of a discussion paper of a proposed licencing framework. "THE ISSUE OF The Council is pleased that EPA has recognised and acted upon the historic opportunity for the issue of pollution control licences FOLLUTION CONTROL LICENCES for forestry operations, which was provided early in 1992 by the notification of pollution due to logging and roading in the Oakes TO STATE FORESTS OF NOW" SF, in the upper reaches of the Bellinger River catchment. CONTENTS The Environment Council wishes to thank EPA for convening several Paga No. meetings with public interest environment and conservation groups 0. SUMMARY on this topic: the issue of water pollution control licencing for state forests; and for responding to our member groups concerns. 1. INTRODUCTION \ NCEC requests written answers be provided to questions posed to 2. GENERAL REMARKS EPA in its letter of 13/4/1994, signed by Ms Orrego. COMPENTS ON The Council welcomes the opportunity to comment on EPA's Discussion Paper on 'The Issue of Pollution Control Licences to З. NEW FEATURES State Forests of N.S.W.'. NCEC's Submission offers the following 4 general remarks, more detailed comments, further questions and RPOAD FRANTLIGRE a series of recommendations. 5. AREAS TO BE COVERED BY A STRATEGY 7 Council seeks a written response from EPA to its submission whic: answers the questions, addresses the various recommendations and 6. MATTERS STRATEGY MUST ADDRESS 8 advises how NCEC's submission has been taken into account by EPA. 7. DUAL PURPOSE OF STRATEGY Very significant further work is required to adequately develop-11 the proposed licencing tranework into an operational process, and 8. SITE SPECIFIC CO.DITIONS Council is concerned that rapid progress needs to be made if the 12 licencing framework is to be operational by the date of next EXPERTISE IN PREPARATION OF STRATEGY AND CONDITIONS 9. FCNSW (SF) licence renewal application on August 7 1994. 13 10. SCOPE OF LICENCES Further Council requests that EPA convene another meeting with 14 environment and conservation groups to discuss the EPA's 11. WATER QUALITY MONITORING refinement of the proposed framework for water pollution control 15 Licencing, soon after EPA has digested the various submissions, REPORTING OF POLLUTION 12. and prior to any licnce renewals. 17 13. POLLUTION WD COMPLIANTS REGISTER Council recommends this meeting include all parties interested 19 in the final framework's design including FCNSW (SF), timber 14. LIST OF RECOMMENDATIONS industry, consultants, Department of C&LM, Water Resources. " next dusit

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MER lac, Sibnission on STA Discussion Peper un 'The (same of Politicion Control Licences to SP'(PC) - Page2

#### 2. GENERAL REMARKS

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NCEC supports the approach taken by EPA to date in seeking to achieve water quality protection through the requirement that best management practices be observed. To date those 'best management practices' have included the SEMC's and more lately the 1992/93 SEMGL's.

However, Council believes that despite their recognition as emergent 'best management practices', because the SEMGL's are acknowledged as still needing scientific validation on their adequacy to prevent water pollution, there is scope for the use of prescriptions of discharge limits to in achieveing water quality standards. These discharge limits must be set at zero permitting no pollution.

While Council is happy enough to have the opportunity to comment on the framework for licencing Forestry Commission of NSW (SF's), Council is concerned that each 'pollution control licence' ought itself to be the subject of a public participation processes. NCEC recommends that each 'pollution control licence' be the subject of a public participation processes.

The appropriateness of seeking further public participation is underscored by the the facts that:

the soil and water likely to be affected are public resources, as is the timber proposed to be harvested,

proposed works are on public land, allegedly under the supervision of a public authority;

 Forestry Commission's operation of their statutory powers has been appalling in most areas of its responsibilities;

Council notes the invitation to submit public comment on components of the framework, but is concerned that many matters relevant to the effectiveness of the proposed 'icencing framework's are not able to be commented upon because the 'components' underdeveloped and not presently publicly available.

Commonents which the Council would have preferred to be able to review publicly include:

- the 'general operating conditions';
- soil erosion and water pollution control strategies, especially any guidelines for the preparation of these stratgies;
- the qualifications and experience required in order to be trained in soil erosion assessment and management in the forestry context;
- the processes by which FPA will approve a person as being trained and "approved : this purpose";

MED Lac. Sabaissing on EPA Miscossion Paper on "The Jusce of Pullistics Control Signates to SF (FE) - Page3

- \* protocols approved by the EPA\* for water quality monitoring;
- the proposed "standardised format" for the periodic reporting of water quality monitoring "results";
- \* EPA's investigation and reporting resources and procedures;

The commission of these important components does not represent a commitment to an open, transparent regulatory process.

The Council seeks the opportunity to comment on these components in due course as they are further developed, prior to their formal adoption.

Council is also disappointed that in discussing the EPA's licencing powers no discussion, let alone reference, is made to the trigger for such a rapid recognition of the applicability of the Clean Waters Act to forestry operations - i.e. the massive pollution event which was detected and reported by North East Forest Alliance in the headwaters of the Bellinger River in the Oakes SF.

EPA's discussion paper ignores the role that the community played in alerting EPA to that breach and in providing the motivation to commence a licencing process for forestry operations. This ommission is unfortunate since the discussion paper fails to identify the very considerable public interest in and community concern about the maintenance of the highest possible water quality.

Regrettably, no further role for the public is indicated by the TPA in its discussion paper, despite the substantial role played by public interest groups to date.

The North Coast Environment Council is keen to challenge an apparatly fundamental assumption being made by EPA in its draft licencing framework. This assumption is the repeated assertion that the Clean Waters Act permits EPA to only consider the amacts on water quality which might be caused by pollution which may arise from the proposed forestry operations.

EPA should accept that it has a responsibility under s.17D(4)(a) of the Pollution Control Act 1970 (as amended) to have regard to "the impact of that pollution on the environment".

In order to do this, EPA must firstly know what constitutes "the environment" which is, or is likely to be, affected by pollution. In order to know the environment at risk of pollution, regard should be had for the the whole environment and various discernible components of the environment including: streambed features, invertebrate communities, macro vertebrates such as platypus, fish, birds and certain hats, and rare fish such as Zastern Cod and rare crusteacea such as the Spiny Crayfish. MCR. Jac. Salmission on BPA Discussion Paper on "The Issue of Pollotion Control Licentes to SP [192] - Pager

The proposal for a pollution control licence to be issued for each of 5 forestry regions is not supported.

The central notion of a broad area 'head' licence subject to more detailed approval processes and more site-specific conditions is supported but under no circumstances could forestry regions be accepted as being the approriate boundaries for such licences.

Each 'ead' licence must apply to no greater area than a total river catchment area such as the Clarence River, though it may be appropriate to limit the 'head' licence area to a subcatchment area such as the Nymboida River catchment (as a major tributary of the Clarence R.).

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This catchment area focus is needed and much overdue, since the target of the licencing process is the protection of identifiable water quality standards in watercourses. In the past Forestry Commission has demonstrated repeated ignorance of and/or confusion on the catchment values of SF's and possible downstream impacts. Licensing on the basis of catchment areas would focus management activities on the functional systems under management.

Issue of licences on a catchment or sub-catchment basis would also assist accountability and auditing processes since all licences and subsidiary conditions and approvals for any major water course would be immediately identifiable ...

WCEC rejects the use of Forestry Commission (SF's) regional moundaries since these are arbitrary, administrative units which are subject to periodic adjustment (last changed 2 years ago) and poor map and on-site definition. Use of FCNSQ regional administrative boundaries would continue confusion in the field, revent easy identification of which watercourses were subject licences and subsidiary approvals and would perpetuate the . 

CEC agrees that new general operating conditions (GOC) should\_ be enforceable, but is disappointed that the GOC are not specified or given in example in the Discussion Paper.

It is encouraging to see the claim that "many of the discretionary aspects of the SEMGL have been removed for this urpose to create enforceable conditions" but because the draft SOC's are not avilable there as no evidence to support the claim.

The Council advises EPA that it has substantial concerns about N the nature, scope and perational effectiveness [SEMGL's. These concerns are present), being documented to the Department of onservation and Land Management. A copy of this document will a provided to the EPA for information shortly.

Nome of ou. conc. about the SEMGL's may be able to be dealt with by way of redracted GOC, but other concerns may need greater '9 Sideration.

+ Research needed on adverse impacts of pollution on aquatic species . ... op ETA Discussion Typer on 'The Issue of Juliat. ... Control Licences to SF'(FC)- Page

It is essential that in reviewing any soil erosion and water pollution control strategies that this broader understanding of the EPA's responsibilities be accepted and operated.

NCEC recommends that EPA respond to this iportant point in its revised framework for water pollution confiol licencing.

Council is disappointed in the presentation of the discussion p per in that no pages, headings or paragraphs are numbered. making reference to relevant sections difficult. No research is  $r \in \mathcal{T} \subset \mathbb{R}^{n}$  to nor are other relevant publications referenced.

STATTS ON NEW FEATURES

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errors and for setting site specific conditions; and augure compute to monitor water quality

are generally supported, subject to specific comments made in the repevant contions of this submission below.

the of marking out Additional features which the Environment Council would have A liked to see included in the framework include:

processes of consultation with relevant state agencies such as NSW Fishering, Water Resources, water supply authorities. local councils etc;

. public participation processes for each 'head' licence and for soil erosion and water pollution control strategies:

- a complete description of the baseline studies required before any strategy for any operation can be commanced. including methodologies for describing soil types, hydrology, aquatic systems (including hed loads), climatic and topographic conditions, etc.
- the involve int of an independent scientific advisory body is oversee. . Later quality monitoring methodology design, implementation, reporting and review;
- an evaluation of the effectiveness of the newly released 'Codes of Logging Practice' (or similar)

As it presently stands, the proposed licencing framework does not appear to be an open, accountable, transparent process.

#### 4. COMMENTS ON BROAD FRAMEWORK

NCEC generally supports the proposed framework, though it does so conditionally and with considerable reservation.

While it appears that the proposed framework may be practical and capable of being operated, its effectiveness and accountability remain under serious question since relevant information appropriate to these issues is not available to the public.

A great many relevant matters, itemised above, ought to have been included in the discussion paper to enable greater than soutiously conditional support to be expressed.

ECEC for. Submission on SPL Discussion laper on "The issue of Pollotion Cubing Licences to SP'(FC) - Pages

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### 6. COMMENTS ON MATTERS STRATEGY MUST ADDRESS

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This section is generally supported though concern is expressed that there is no specification of how (i.g. accepted methodologies) descriptions will be made, or hazar's identified.

Council recommends that EPA include as part of the final licencing framework an inventory of approved rethodologies for achieving reliable information in soil erosion and water pollution control strategies.

Additionally, NCEC recommends that a strategy must include a water quality profile of the area proposed to be harvested, compiled prior to the conventionent of any works, to provide baseline information upon which to measure future water quality standards.

### /ADD "EXISTING

The ommission of this requirement is disappointing .

NCEC also recommends that each strategy be required to specifically address tarchment erosech and hydrology, stability of hillslopes and scream banks, specifical sinks and any potential culminative impacts. Cumulative

The inclusion of an "outline" of the practical measures etc is not considered appropriate. An "outline" will not be satisfactorily detailed for an effective strategy. Rather than in "outline", a strategy ought to include a full description of the "practical measures" etc.

Council's earlier comments about the inappropriateness of any reliance on FCNSW (SF's) discretion in interpretation is also partiment ir considering the application of the term "practical" in association with measures etc.

It is recommended that EPA specify what matters could be considered in deciding "practicality". No discretion should be iforded FCNSW in this matter. However before adopting such opproach EPA ought to consult widely across practitioners in soil conservation and water pollution control to discover new, ffective, innovative, practical measures which are currently in use or under development.

"t is retical to roid forestry operations on slopes over 25 and in hig, reservation value old growth forests and wilderness areas.

Mowever, FCNSW will claim that, given its alleged commitments to the timber industry, or the local MP's predilection to maintain unsustainable levels of timber industry employment, it is NOT practical to avoid operations in these areas. How will EPA assess whether measures proposed are "practical" or whether there are "practical" measures available which lave been committed?

Also how much will cost of measures have a bearing on practicality? Could SF say its too expensive to do the right thing therefore its improprial. Would EPA reject this? Submission on EPA Discussion layer or the issue of Pollotion Control Licentes to SF 181 - Page9

Obviously it is more practical to completely avoid areas which could only be logged subject to rigorous and exhaustive conditions, than it it is to go through the lengthy and complicated process  $c^2$  is an approval for a controversial and vulnerable area.

The Council is concerned a substrate internal contradiction in this section. It is fire provide a the practical measures be outlined for conditions which "<u>minimise</u> water pollution which could be caused by soil erosion", and yet later a strategy must "be capable of <u>protecting</u> from water pollution the whole of the forestry area"...

It is NCEC's strong recommendation that the strategy and conditions must aim to prevent all pollution, and must not be allowed to degenerate into a lower standard of minimising pollution or regulating 'acceptable' levels of pollution.

No goal except the prevention of pollution is acceptable since maintaining or recovering high was nat al objective. Further, east appropriate the restry-which requires a sermissible level of pollution cannot claim to be ecole. not permit activities which are not spically sustainable.

The precautionary approach set out in the National Strategy on Ecologically Sustainable Development (NSESD) and in the Inter-Governmental Agreement on the Environment (IGAE) is particularly relevant a setting the primary aim of the licencing process. It is an enged by EPA elsewhere that pollution control in for it perations is a new regulatory area, where not a great light is shown about effective mitigation measures, potential spects and their consequences.

iven this imprecise knowledge, in an emergent technical field, fleat care must be exercised by EPA and FCNSW in their proposals for operations and approvals.

. relation to "practical measures" NCEC submits that for the corests of the north east of NSW it is practical to limit:

- logging to slopes below 25 degrees;
- road construction to grades of 6 degrees;
- snig tracks to slopes of 25 degrees or below;
- handfire burning to slopes of not greater than 25 degrees.

It show to incumbent upon FCNSW (SF's) to establish beyond reasonable doubt, consistent with the principles of ecological sustained the development (including the precautionary principle), that to practical to exceed these recommended limits.

Given the dearth of a guantifiable body of research or verifiable data demonstrations the effectiveness of any conditions being applied to contained, let alone operations in excess of these limits, and the uncertainty inherent in any operations over these imits expressed by various researchers, scientists and field

#### WE Lat. Submission of CTA Discussion Paper on "The issue of Pollation Control Lineares to SC (R) - Pro-

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practitioners, the FCNSW's satisfactory demonstration of the practicality of exceeding these limits seems unlikely.  $\mathcal{MDP}_{\mathcal{F}} \times \mathcal{R} \cup \mathcal{F}''$ 

In the absence of such demonstrable practicality EPA will have no option to refuse to accept proposals for operations which exceed these limits.

NCEC is aware of research relevant to se limits as fo/lows:

- logging on slopes not to exceed 2° legrees: Dr J McGarity, § UNE Conference 'Sustainable Forestry in Australia': Future Directions' 1993;
- road construction grades not to exceed 6 degr/es: M.S. Harewood 1994;
- \* snig tracks wit to exceed 25 degrees: Bill Kervuish CSIRO 1993;
  - handfire burning to occur on slopes greater than 25 degrees: Cheney, and & Knight 1992 for National Bushfire Research Unit.

NCEC is not confident that FCNSW /SF) is capable of identifying whether any additional water quality monitoring should be carried out. Council has grave the methodologies for water the intering. Given the FCNSW's current withodologies for water the intering. Given these concerns NCEC recommends that for  $M_1$  rely on FCNSW to identify whether, or areas wher intering monitoring should take the transmission.

Forther, Council is considered that notwith and the early assertion that the SEMGL's were being developen to enforceable standards through the expunging of discretionary aspects, the <u>Discussion Paper requires that the strategy must take into</u> account (presumably on a discretionary basis) the SEMGL.

It is not explained why this reference to SEMGL and a perating conditions) continues. Nor is it explained we the strategy would "take into account" the "relevant of logging practice prepared by State Forests (if approximate the relevant that compliance, with the relevant (unspecified) code of logging practice will be required.

Council recommends that these matters be explained.

There is no reference in the Discussion Paper to a timetable for the preparation of soil erosion and water pullution control strategies.

NCEC recommends that a timetable of proposed strategies be submitted to EPA by FCNSW (SF) with the pollution cortrol licence application or within 7 days after its lodgement

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TEC recommends that such a timetable of states sught to be prepared on the basis that strate, a = aprepared for areas of no or low conservation support last for areas of highest conservation value.

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Ξ Σ In considering particularly the first of these proposed strategies and conditions NCEC submits that the EPA, in satisfying itself of the suitability of the strategy and conditions, must exercise the precautionary approach and err on the side of caution in issuing approvals. Little is yet known on the reliability of certain prescriptions, because postimplementation monitoring of the effectiveness of prior applied conditions (SEMC's and SEMGL's) is presently rudimentary and underdeveloped.

NCEC considers the adoption of such a precautionary approach essential for EPA's and its' licencing process' credibility.

NCEC regrets that EPA did not include in the Discussion Paper, or refer to, a detailed list of the methodologies which must be applied to produce an acceptable strategy. The short and general list of matters to be addressed does not provide this level of information.

Council recommends that EPA include in the final licencing framework a  $\phi$  failed list of the methodologies which must be applied to  $\phi$  face an acceptable strategy.

CONMENT: MEAS TO BE COVERED BY A STRATEGY

NCEC recomments that the EPA impose an upper limit of 3007 ha? on the area the subject of a strategy, to prevent FCNSW trying it on again' by deliberately choosing a very large area and preparing a strategy which cannot provide the necessary level of detail and site specificity. Left to themselves FCNSW cannot be trusted to interpret regulatory requirements in a descretionary manner.

Too many examples exist, particularly in it estry EIS's, of FCNSW attempting to thwart regulatory requirements by adopting obtuse, administratively convenient or 'creative' interpretations of legal obligations, for this discretion in determining the size of a strategy area, to be allowed to be operated without dire guidance.

If EPA fails to direct or otherwise specify the upper limit for a strategy's area, it can be reasonably predicted that this issue: size of strategy area; will become a matter of contention in due course.

The statement of how the size of the forestry area to be covered by a strategy is to be ascertained is not well expressed. Given that many compartments, particularly remaining old growth forest areas, have, in a compartment of average size 250-300ha, a broad range of topographic, climatic and geologic variation, how will an area generally "uniform in relation to the conditions needing to be applied" be identified?

Will this approach mean that some compartments may require the preparation and approval of more than one strategy?

KOE Isc. Subcission on EPA Discussion Paper on The issue of Po. . . . . . . . Licentes to SF'(FC) - Page6

Why remove "many" discretionary aspects to create enforceable conditions but not remove ALL discretionary aspects? What aspects remain discretionary? Why are these unchanged?

Council recommends that EPA convene a working group with C&LM and SF to address concerns with SEKGL's and to further develop the proposed General Operating Conditions.

Reference is made to "the relevant codes of practice" prepared by FCNSW (SF's) and "other conditions included in the current licences" but these are not specified.

What is the relevant Code?

What other conditions continue from Parlier to Subsequent licences? Will all relevant water policition control licence documentation, such as licences, conditions, and strategies, still be required to be publicly available at FCNSW (SF) offices?

What steps has EPA taken itself to evaulate the appropriateness and effectiveness of "the relevant cores of practice"?

Is the EPA aware that the recent "relevant codes of practice" prepared by FCNSW (SF1s) were developed prior to the adoption of national standards for such codes of logging practice?

Is the EPA aware that a joint Commonwealth/ State Government discussion paper "Setting Baseline Standards for F estry Operations (check corect title) is being developed for the [new name for Australian Forestry Council].

Will EPA overhaul FCNSW (SF's) Codes of Practice once these national standards are adopted to ensure that the "relevant codes" meet the national standards?

Council recommends that EPA undertake a review of the "relevant odes of logging practice" immediately following the adoption of "ay national standards" or guidelines by the [AFC renuaned?]" and "ior to considering further applications for renewal of annual licences.

The proposal to prevent forestry operations until a soil erosion and water pollution control strategy and site-specific conditions have been considered and approved is endorsed.

NCEC believes that any Notice to permit commencement of operations ought to be made public at the time of the Notice's issue and be available as part of the licence documentation.

The Environment Council recommends that both the soil erosion and water pollution control strategies and site-specific conditions be the subject of public participation processes that would allow the public to comment to FCNSW (SF's) on their proposed strategies and conditions prior to FCNSW forwarding them to the EPA for consideration for approval.

Aque because not provide the control of the control of the because of the because of the because of the control RUST Inc. Subaission us By Vistassion Paper on "The Isree of In Intion Control Licences to SP'(IC) - Pagel

EPA should refuse to accept a strategy for logging of high conservation significance) of possible forestry operations within with the 'head' licence area have strategies prepared for the

Council recommends that all final soil erosion and water pollution control strategies must be binding; and non a cretionary. They must be publicly available as licence e uncentation in the same way as the 'head' licences were previously required to be publicly available.

7. COMMENTS ON DUAL PURPOSE OF STRATEGY

The dual purpose of a strategy, to meet requirements of both the LPA and the Minister for Planning, is supported.

't is recommended that EPA and C&LM consult on and co-ordinate their respective legal requirements for strategies, to achieve the greatest degree of mutual satisfaction, in order that the extent of strategies propared for dual purposes can be maximised.

The preparation of a strikegy for EPA's purposes, for areas where a strategy is not required by the Minister for Planning is also supported.

The dual purpose approach needs careful scrutiny." A purported dual purpose strategy may address EPA's water pollution control requirements but not fulfill them.

Currently disputes are occurring between FCNEW and C65M regarding the appropriate methodology for the description of soil types, soil landscape mapping, the derivation of soil grodibility indices and the application of the Universal Soil Loss Equation (USLE).

EPA cannot allow FCNSW or their consultants to attempt to reproduce-such a dispute in the pollution control licencing process, by claiming that an approved strategy by the Minister for Plan ing, using disputed methodologies, is satisfactory as a dual purpose strategy for EPA's purposes.

EPA must resolve what it considers as satisfactory methodologies for soil type identification / mapping, applicability of the USLE and erodibility indices as a matter of priority.

NCEC recommends that SPA resolve these technical concerns about appropriate methodologies through scientific peer review of consequently, NCEC recommends that PA undertake an exhaustive proposed methodologies.

and separate consideration of the (Adequacy of any proposed) soil erosion and water pollution control strategy. Such consideration should commence from a realistic - ognition of FCNSW's repeated failure or inability to willing" - rly with outside regulatory requirements.

MCD. Lic. Subaission on EDL Discussion laper on The Issue of Pollorica Control Subary to SP (FC) - Pagh2

The Environment.Council is concerned that there is no exploration of how the Department of Conservation and Land Management's roles intersect with the powers and duties operated by the EPA

Council recommends that as a further component of the licencing framework EPA clarify and document the cles C&LM will play in finalising the General Operating Conditions, in preparing or reviewing soil crosion and water pollution control strategies or site-specific conditions.

Further, NCEC recommends that C&LM's role in investigating follution control incidents, recommending remediation measures or asisting in any prosecution of a breach of licence be explained.

to include additional site specific conditions. Harvesting aplied within the compartment proposed to be harvested.

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The Harvesting Plans have not been referred to in the Discussion Paper despite the fact that they currently provide the operational framework under the Forestry Act.

NCEC recommends that the EPA explore the possible 'dual purpose' of site-specific conditions to meet EPA and FCNSW (SF) own requirements.

8. COMMENTS ON SITE SPECIFIC CONDITIONS

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This brief section is wholly unsatisfactory as it is presently expressed in the Discussion Paper.

While it is agreed that an additional layer of site-specific conditions is required beyond the GOC's and soil erosion and. wate pollution control strategies, it is not considered apprenate to leave the objective of additional site-specific conditions defined in such broad terms as "prevent, control. abate or mitigate water pollution".

Council recommends that EPA direct PCNSW, in preparing site specific conditions, to devise effective practical measures which will prevent pollution. It is unacceptable to NCEC that FCNSW could be permitted to devise measures whose objective might be to simply "control, abate or mitigate" pollution. No pollution is the goal.

An additional discussion point for the licencing framework might be the inclusion of a requirement for either FCNSW or EPA to develop an 'expert systep' for site specific conditions. This would be a hank of site-specific conditions which have been independently validated as being effective for specified site conditions.

(CEC Joc. Submission on EPA Discussion Paper on 'The issue of Polition Control Licences to SF 1901 - Page4

#### 10. COMMENTS ON SCOPE OF LICENCES

NCEC notes with approval that the scope of the proposed licences is narrower than the 1992 licences which permitted pollution by substances other than soil.

Council recommends that the proposed licences and related strategies and site-specific conditions address measures to prevent water pollution from vegetation and ash or other debris from burning activities.

Council believes that the Discussion Paper should have referred to pollution from materials other than soil, rock and vegetation.

NCEC is aware of the potential for pollution from fluids associated with various types of machinery used in forestry: bulldozers, 4WDs, chainsaws, snigging tractors, [fuel: diese], petrol; engine, transmission and hydraulic oils; brake fluids, radiator coolants or anti-freeze, et al ].

It does not require a great deal of speculation to imagine a situation where a bulldozer's diesel fuel tender, usually hauled deep into the compartment being worked, is either damaged in the forest, poorly whintained or carelessly unloaded such that diesel fuel is spilled, possibly in significant quantities, occasioning a pollution incident.

Additionally, litter can substantially pollute water and watercourses, constituting major visual pollution of otherwise natural areas. Further, it possible that chemicals (such as herbicides or insecticides) used for plantation or other forestry purposes could gose a potential water pollution hazard.

is it proposed that pollution of waters from these sources will not be subject to licences and conditions?

How will EPA respond to complaints of pollution from these sources?

Does the "relevant code of logging practice" satisfactorily address these concerns?

Further, the Discussion Paper is aimed at Forestry Commission (SF) but makes no reference to the need for timber industry personnel to be licenced.

The ommission of discussion of the issue of pollution control licences to individuals who are members of the private timber industry is curious since the 1992 licences pointed to the need for separate licences for timber industry workers and FCNSW referred to industry as being 'to blame' for pollution of the Bellinger River, in proceedings before the Coffs Harbour Local Court when prosecuted by EPA over pollution in the Cakes SF.

Is it proposed to issue pollution control licences to timber industry workers? If not, will EPA require CALM, who licenses foresty operations on private "protected" lands, to act a license in the same way SForests are being required to (in they are applying but for their own protection NET be have

TIRE for. Schuissing on BPA Discussion Paper on "The Issue of Pollotica Control Licences to SP'(FE) - Pages

What will be the relationship between a pollution control licence issued to FCNSW (SF's) and timber industry personnel working within an area for which a licence, general operating conditions, a soil erosion and water pollution control strategy and sitespecific conditions have been approved by EPA?

NCEC recommends that EPA include licencing of timber industry personnel within the framework for issuing water pollution control licences to FCNSW (SF).

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#### 11. COMMENTS ON WATER QUALITY MONITORING

Council supports the requirement for FCNSW (SF) to investigate the impacts of logging on water faility by monitoring water quality in areas selected in consultation with EPA.

A critical pre-requisite te ost-implementation monitoring is the recording of a water / profile of the area prior to the commencement of any works. This water quality profile should be a central component of any soil erosion and water pollution control strategy.

It is essential that EPA play an active role in selecting these sites since NCEC has no confidence in FCNSW's capacity to properly identify a range of representative areas

FCNSW's identification of sites for its EIS vegetation and wildlife survey & study plots has been shown to have suffered from serious site selection flaws which were not reported by FCNSW. There is no reason to believe that, left to their own devices, FCNSW may not make similar errors in identifying water quality monitoring sites.

NCEC agrees that undisturbed fore-'s and forests currently being logged should be monitored for was a quality, but Council is not satisfied that, water quality toring, will only address respresentative sites logged in two last"3 years.

Dr Martin Thoms, consultant fluvio-geomorphologist, advises that US studies (Coweeta) show that despite the regrowth of vegetation, suspended sediment concentrations can still remain elevated during storm events, for more than 20 years after initial logging, and up to 80 % of eroded soil can remain within stream channels 2-3 years after to ing finishes.

NCEC recommends that EPA include in the representative areas to be monitored for water guality, sites which have been logged in the last 7-9 years.

North Coast Environment Council Inc has grave concerns about the scientific validity of methodologies used by FCNSW (SF) in monitoring water quality.

#### Sfer Luc. Submission on SPA Discussion Paper on "the laste of Pallation Control Licences to ST 1/13 - Page6

Specifically, NCRC rejects the reliance on data obtained by regular periodic monitoring of water quality indicators, since such data understates actual turbidity levels immediately following normal and peak discharge events.

Council believes that water quality monitoring should not be averaged out over arbitrary periods, thus reducing overall levels of turbidity.

VCEC recommends that water quality indicators (including total dissolved solids, sediment load, particle size distribution, nutrient distribution etc.) should be measured immediately after discharge events and for regular periods thereafter to record actual levels of water guality at and immediately after the time of a discharge event.

Further, concern is expressed at FCNSW's practice in some EIS's of understating stream loads and turbidity levels by reporting the concentration of suspended sediment or solute rather than reporting totals loads. Very high loads may be masked by high stormflows diluting the total volume of sediment transported.

For these reasons NCEC supports the requirement that FCNSW (SF's) undertake this monitoring in accordance with protocols approved by EPA.

NCEC recommends that in developing such protocols, the protocols be subject to a period of peer review by academic and other practitioners in water quality monitoring. Further, NCEC recommends that these protocols be available for public comment and input to EPA, at the same time as the scientific peer review.

Council does not support the proposed monitoring reporting method where results would be summarised by FCNSW. NCEC recommends that all data be reported as raw data in addition to any analysis or summaries. Council recommends that this raw data and all data summaries or analyses must be reviewed and re-evaluated by EPA or independently elsewhere, rather than be 'accepted' on' face yalue.

Council recommends that the standardised format for the making of reports on water quality monitoring be the subject of external scientific peer review before it is adopted by EPA and applied.

Council recommends that the data, results and all summaries and standardsised reports on FCNSW water quality monitoring be publicly available as licence documentation.

Council is concerned at the lack of scientific validation of the design and operation of FCNSW's research catchments. Council is aware of considerable criticism of the research catchments in the state's south east and holds serious reservations about the transferability or applicability, to other catchments in the Sate's north east forests, of any research results derived from

' ma Karuah River research catchments.

TE loc. Subaission on EPA Discussion Paper on The issue of Pollation Custrol Licences to SFiff() - Pacier

Consequently, NCEC recommends that rather than require FCNSW to Simply "maintain its research catchments" EPA should embark on program of critically evaluating the usefulness of the existing 'research' catchments and their methodologies as baseline studies, and testing the validity of any claims as to the broad application of results to other catchments.

{CEC supports the requirement that FCNSW provide a copy of any sublication generated as a result of research conducted in research catchments, but believes that this requirement may mader rather than accelerate publication of research, which may st rotentially adverse to the interests of the FCNSW or timber ....ustry:

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The Council supports the notion that water quality monitoring and research programs are aimed primarily at improving management practices and refining management prescriptions.

Council is adamant however that the intention of such improvement and refinement must be to prevent any impact from logging on water quality, NUT simply to minimise the pollution to the greatest extent practically possible.

#### 12. COMMENTS ON REPORTING OF POLLUTION

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The North Coast Environment Council supports the requirement that FCMSW (SF's) notify the EPA within 24 hours of becoming aware of pollution of waters which may have been caused by logging operations.

Council opposes the additional caveat to the definition of pollution incidents which are required to be reported viz: "and which makes or may make those waters noxious or poisonous or marmful or (potentially harmful to human beings, wildlife or regetation." Bester all polymetentally harmful at a Bester all polymetentally harmful at a Council believes an additional quarter and its unnecessary study be

it undermines from the strict liability which applies to porto pollution incidents, and reserves to FCNSW's discretion and assessment of whether the pollution "makes or may make ... "etc.

It has been repeatedly shown that the FCNSW is not capable of properly operating any discretionary powers and will use such discretion in the narrowest sense rather than broadly.

Council recommends that the terms of the pollution control Licence require FCNSW to notify EPA within 24 hours of becoming aware of pollution of waters which may have been caused by logging operations, without further qualification or caveat.

MCEC supports the idea that EPA may request a written report of the pollution, and recommends that in every pollution incidence EPA require the written notification of pollution, in a standardised format.

STE Sec. Subaission on EPA Discussion Paper on 101 and of Partie and a function SPITE - Page8

VCEC recommends that a format for reporting pollution incidents nelude:

\* a precise location of the poll tion event, \* an accurate identification of the catchment value waters polluted (or potentially polluted),

\* the substance causing pollution,

\* its mass or volume,

\* the time FCNSW (SF's) became aware of the pollution.

\* how FCNSW became aware of the 'Ma Cent.

+ the names of the P. ervising FCLos taff

\* the names of any prevat industry or FCNSW staff involved.

any other ideas for the report?) Rainfall estimates for leading up

NCEC is disappointed that in its framework for licencing EPA has not referred to the Authority's processes for investigation of nd public reporting on any notification of a pollution incident.

The Environment Council believes that it is important to document is a part of the framework, EPA's powers to intervene in work where pollution may have been notified; to apply a 'stopwork'order or to issue a Notice etc.

NCEC recommends and requests that EPA set out its staff resources and management decision making processes for investigating and publicly reporting on FCNSW (SP)'s notifications of pollutionincidents as additional components of the final licencing iramework for FCNSW (SP) to demonstrate of its commitment to an open transparent process.

Further it is recommended that EPA require FCNSW (SF) to set out in its General Operating Conditions, its processes of responding to a pollution of the state of the second secon

"h. Environment Council is aware that the Authority is concerned that excessive time and resources may be diverted from its range of functions, in investigating and reporting on unfounded or vexatious complaints.

The Council is also aware that the Authority could be greatly assisted if members of the community are trained in the standards of reporting and gathering of 'prima facie' evidence which might be collected to support a serious, founded complaint...

NCEC acknowledges that much relevant information, such as copies of licences and conditions, will be required to be made publicly valiable.

ionetheless, many of the Council's member organisations, being community based environment centres, would appreciate ready information to make available to a potential complainant to assist them to test. and, if appropriate, formalise their complaint. This might include a complaint 'form' or 'checklist'.

See inc. Submission on 274 Discussion Paper on "the Issue of Pollotion Control Licences to SF' [R] - Page9

NCEC recommends that EPA develop public education and community training programs to explain the forestry pollution control licencing framework (state's pollution laws), the rights and responsibilities of FCNSW (SF's). EPA & other government agencies, the timber industry, and the public. Such programs would assist in the diligent enforcement of licences and the prevention or early detection of any breach of law, leading to the swiftest action possible on any appropriate remediation and prosecution. I function would be public of public or is recommended that these public education and community wolk programs could form additional components of the EPA licencing for framework.

### 13. COMMENTS ON POLLUTION AND COMPLAINTS REGISTERS

The Discussion Paper does not explain whether it is proposed that only one water pollution incident register will be kept by FCNSW (SF'S), presumably at Head Office in Pennant Hills, recording all incidents of pollution by FCNSW across the state.

NCEC recommends that each region or carchment for which a 'head' licence is issued be required to publicly nominate an office at which it will keep a water pollution incident register.

NCEC recommends that each water pollution incident register be publicly accursible for inspection during normal office hours.

NCEC recommends that FCNSW be required to enter the details of any pollution incident into the regional or catchment water pollution incident register within 24 hours of becoming aware of the incident, as it is required to notify EPA.

#### COMPLAINTS REGISTER

The Discussion Paper does not explain whether it is proposed that only one complaints register will be kept by FCNSW (SF'S), presumably at Head Office in Pennant Hills, recording all complaints of incidents of water pollution in state forests across the state.

""E2 recommends that FCNSW be required to enter the details of y complaint of a pollution incident into the regional or tatchment complaints register immediately a complaint is received.

+ what action falcenor proposed.

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NCEC recommends that and a flut in companies, register recire the following informult set \* the date and tim of obe applying tion incident \* a precise location of the findy bu \* the waters said to be pulseted (or providelity pollution \* the substance C a top for at on

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TO THE PORT OF THE LOSS OF 3.5 NCEC recommends ACTION DUT IN DOUBLE WITE IN SA publicly accessib + - - -

r following r following r action tuber r action tuber

mittee.

Cr Orrego is one of 14 people appointed to the committee. which will be chaired by the Department of Conservation and Land Management anyone, on both sides (CaLM) Director- [of the environment General Warwick debate], to let me know Watkins.

received a letter in- bring forward to the forming her of her committee." success and was waiting on an informa- mittee would be a good tion pack for details forum to present all of the committee.

Although she did the environment move-

Nambucca Valley not know much about Conservation Associa- the committee, she said tion vice-president and it was a public consul-Nambucca Councillor tation committee which Lyn Orrego (pictured) was designed to advise has been included on forestry on a State the new State Forestry level on new policies Policy Advisory Com- and management of State Forests.

"I am pleased to be able to represent the environment movement on this committee." Cr Orrego said.

"I am appealing to if they have any issues She said she had they would like to

> She said the comthe goals and aims of



Cr Lyn Orrego

ment, where they would be "reaching the top on Land and Water for consideration".

committee include the Forest Protection So-Nature Conservation ciety NSW Co-ordinator Council's Sid Walker, Rhondda O'Neil, State North East Forest Alli- Forests of NSW Manance's Dailan Pugh, aging Director Dr Hans South East Forest Alli- Drielsma, Department ance's Stephen Jagoe, of Planning's Rex Forestry Industry rep- Bowen, NSW National

Dorber, Union representative Gavin Hilber. Local Government representative councillor Ian Chaffey. Ministerial Committee Conservation Chairman Members of the Peter Cochran MP.

# Nambucca councillor joins **Forestry policy committee**

resentative Colin Parks and Wildlife experience to the com- mittee will provide a Service's David Papps mittee. and CaLM Forestry

John Halkett.

members were ap forests," Mr Souris said. "It will assist the pointed on the basis of their ability to contrib- creation of a Forestry ernment reach a balute to the committee's Policy Unit in the ance between the work.

He said they were and the establishment forests and their use. widely respected within of an independent Board and the achievement the groups they repre- of Management for State of a viable and sussented and brought a Forest of NSW. range of views and

Policy Unit Director of the committee is one community, industry of a number of initia- and government in NSW Land and Wa- tives the government the formulation of ter Conservation Min- has taken to improve forest policy." Mr ister George Souris said the management of NSW Souris said.

process for involving The appointment conservationists, the

These included the community and gov-Department of CaLM conservation of our tainable forest indus-The advisory comtrv.\*

ORTH OAST **NVIRONMENT** OUNCIL INC.

THE HONORARY SECRETARY: Mr James LO Tedder, Pavan's Road, Grassy Head, Yarrahappini via Stuart's Point. 2441 Ph and Fax 065 690 802

Jim Tedder

Dear Tim

6 May 1994

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Please find enclosed, for your information, a copy of the North Coast Environment Council's submission on the recently exhibited EPA Discussion Paper on the 'Issue of Pollution Control Licences to State Forests of NSW'.

NCEC is very cautiously supportive of the broad framework but is quite critical if the level of information presented and the limited opportunities for ongoing public participation in the licencing of State Forests or other public authorities.

Fell free to use this submission as appropriate to further the interests of protecting our precious water, both quality and quantity, and preventing all foreseeable, avoidable pollution.

We request that you acknowledge and reference the Council's submission if you quote from or referred to it in any publication. Thank you!

Please note that the Environment Council is of the view that forestry which reduces water quality and volume, and which routinely pollutes waters cannot be ecologically sustainable.

For more information please contact John Corkill @ Big Scrub Environment Centre Inc. 149 Keen St, Lismore. 2480.

Yours sincerely,

James LO Tedder, Hon. Secretary.

CC. Lyn O. Jeff Angel TEC Sid @ NCC Pan Allan Richard Snes

Richard Stoples Byran EC. Référ Mannick ACF Dr J. M°Ganty Taoy Neuveastle TWS

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PARLIAMENT OF AUSTRALIA HOUSE OF REPRESENTATIVES

SIX ELBOW STREET, (P.O. BOX 1446) COFFS HARBOUR NSW 2450 TEL.: (066) 52 6233 (008) 800 217 TOLL FREE FAX.: (066) 51 4346

GARRY NEHL, M.P. MEMBER FOR COWPER DEPUTY CHAIRMAN OF COMMITTEES NATIONAL PARTY DEPUTY WHIP

> Mr J. Tedder North Coast Environment Council Pavans Rd Grassy Head via Stuarts Point 2441

Dear Mr Tedder,

Thank you for your letter of November 21, 1993, in relation to the timber industry.

For your information, I have enclosed a copy of my recent speech on the timber industry.

Yours sincerely,

Garry Nehl phini

Garry Nehl, MP MEMBER FOR COWPER GBN:CM December 21, 1993.



### [PROOF]

## Extract from the

# CURRENT HOUSE HANSARD

# Parliamentary Database

### FOREST INDUSTRIES RESEARCH LEVY BILL 1993 FOREST INDUSTRIES RESEARCH EXPORT CHARGE BILL 1993 FOREST INDUSTRIES RESEARCH IMPORT CHARGE BILL 1993

Query: Speaker = nehl\*

Article: 16 of 18

Date: 26 October 1993

Page: 2588

Speech in the context of a Bill (Second Reading)

Speaker: Nehl Mr G.B.

Interjectors: MCGAURAN, VAILE

Electorate: COWPER Party: NP Government: NO Page: 2588

### [P R O O F]

### FOREST INDUSTRIES RESEARCH LEVY BILL 1993 FOREST INDUSTRIES RESEARCH EXPORT CHARGE BILL 1993

# FOREST INDUSTRIES RESEARCH IMPORT CHARGE BILL 1993

Second Reading

Mr NEHL (Cowper) (11.10 p.m.)--Before I talk about the Forest Industries Research Levy Bill and cognate bills I want to reiterate something I say very often; that is, that the `p' in politics stands for people. Tonight, in talking about the Australian forest industry, I want to talk about the people concerned-because forests are very like people; they are renewable resources. Sometimes we tend to lose sight of that, particularly in terms of forests--but they are a renewable resource.

I know that, because I had the opportunity of living in a forest area for some years in a little village called Timmsvale up on the eastern Dorrigo plateau, in the hills behind Coffs Harbour. It is a forestry area with families who have been involved in forestry operations for generations. Right at the start I want to pay tribute to those people who work extremely hard in the forests, in a very dangerous industry. I could not possibly begin to count the number of my friends in the forest industry who have fingers, thumbs, hands or arms off; whether cut by saw blades or crushed by falling logs. It is a very dangerous, but important, job.

I think back to the families in the area where I lived; the Timms, the Mulhearns and the Seccombes. While I never met him, I recall the memory of old Tommy Timms who in 1906 walked, carrying the corrugated iron for his first hut on his back, all the way from Ulong to Timmsvale. This man was a pioneer and an innovator. He built the first waterpowered sawmill in Australia--a very significant development. Others included Paul and Paula Lindsay. It is not only men who work in the forest industries, the sawmills, but women as well--and they make a tremendous contribution. John Rhodes and his late brother, Bill, operated a little bush sawmill and worked extremely hard.

All these people love forests and trees. Lyle Timms, the son of Tommy Timms, is a sawmiller who hates to cut down trees. This is so widespread throughout the forest industry. I think of places such as Bostobrick, Dorrigo, all of the forest areas of the Nambucca Valley, the Bellinger and the Macleay. I mention Briggsvale in particular because earlier this year the mill at Briggsvale burnt down, with the subsequent loss of 40 jobs.

#### Mr McGauran--Forty jobs.

Mr NEHL-As the honourable member for Gippsland says, 40 jobs were lost--a very significant number in a small community. That had an impact right across the Dorrigo and eastern Dorrigo plateaus. This gets us to the nub of the forest industry argument--the loss of resource security. The Briggs family was operating the mill at Briggsvale. Jewel Briggs is a very efficient woman. How can the family reinvest millions of dollars in a new mill, after one has been burnt down, without some form of resource security? No people in their right minds could possibly do that.

Megan, Cascade, Ulong, Timmsvale, Lowanna--

Mr Vaile-The bank would not lend them the money.

Mr NEHL-It would not. I wanted to start by paying tribute to those people, because they are extraordinarily important. It is not just those who are working in the sawmills; it is the logging contractors, the bush workers, the haulage contractors and those employed by the fuel outlets, the type companies, the machinery workshops and so on. Up and down the north coast -- Mr Deputy Speaker, you are aware of this--we have seen a tremendous loss of jobs in the logging industry for a variety of mainly reasons, because of extreme environmental activity, but also because of the lack of resource security.

I want to dwell on that because I think it is very important. Australia should realise that if we are going to develop forestry as it should be developed--and have the investment--there must be resource security. In passing, alluding to the fire that burnt out the Briggsvale mill, the social effects are very difficult to identify. I had the privilege of attending a multidenominational memorial service held in



Juel

26 October 1993

what was left of the mill. It was a very moving experience.

The communities in that area are still under considerable stress. It is one of those things that people do not pay sufficient attention to. The coalition has always supported the need for forest and wood product research and a development corporation along the lines of other primary industries. We need to have accurate and factual information about the timber industry. There is a great dearth of factual information. There is a lot of emotion and a lot of garbage talked about the timber industry. Sadly, the fanatical, extreme preservationists have been bandying about propaganda which has been very hurtful to the timber industry.

I believe this is a time when we have to come together. We have to stop the confrontation. We have to stop those fools putting up tripods in the forests and digging holes in the roads and putting themselves down them and we have to get together and talk as rational, reasonable, sensible human beings. There is an answer. I come back to point I made first, which was that forests are a renewable resource and this is the way we should be approaching this matter. There should be a commonsense approach right around Australia so that we can see sufficient investment, so that we can go ahead and renew those forests and keep our timber industry going for a considerable time.

All the major reports on the forest industry, including those of the Resource Assessment Commission's 1992 forest and timber inquiry, the National Plantations Advisory Committee and the ESD working group on forest use have echoed the urgent need for an enhanced, better coordinated and properly focused research program. More research is essential if Australia is to increase productivity and value adding processing in forest and wood product industries and to manage forests in an ecologically sustainable way.

That is the key to it. We must manage our forests in an ecologically sustainable way. That does not mean locking them up forever. It does not mean leaving them in their socalled pristine beauty to die. It is a strange thing but trees are plants; they are living organism and they die. So what we need to do is to manage forests sensibly and rationally.

The timber industry has an enormous growth potential. Until now, we have largely

concentrated on the domestic market. We still only provide two-thirds of Australia's needs and we import more than \$2.4 billion worth of product--much of it high value pulp and paper products. We should be value adding in this area in Australia. It is absolute economic madness not to do that.

We export \$775 million worth of forest products. This leaves us with a trading deficit of \$1.66 billion. That is stupid. We are not using the land mass we have in Australia. What we need from the federal government is not just more research but sensible taxation policies which will enhance the possibility of people putting in more forests and making it profitable to do so. We can reduce the imports of timber products by value adding. This is absolutely essential if the industry is able to be competitive and capitalise on the resources we have.

A Forests and Wood Products Research and Development Corporation would be a body corporate with day-to-day autonomy and the flexibility to operate similarly to commercial operations. It can identify national research priorities and assess research gaps. We need to commission, administer and evaluate research into a broad range of areas relating to wood production, extraction, processing, economics and marketing. Once that corporation is established, it will have a high range of industry involvement and accountability.

There has been a very big focus on the conservation of our environment in recent years. Quite frankly I welcome this. Anybody who thinks that we can neglect and rape our environment is absolutely crazy. Everyone in this country has to be conscious of the need to look after what we have got.

Timber is a renewable resource but other things are not. It is the responsibility of every Australian--whether they be in this parliament or whether they be a schoolchild--to be conscious of the need to conserve and look after our environment. That comes back to the need for rational, reasonable and balanced management of our forest resources.

There needs to be a balance between keeping people in jobs in the forest and timber industries and keeping our environment to be enjoyed for future generations of Australians. Those two objectives are not incompatible. With goodwill and commonsense we can continue not just to log our existing forests, but enlarge our forests--as we have been doing

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#### CURRENT HOUSE HANSARD

and as we must continue to do.

As I said, those two objectives are not incompatible. We can continue to provide jobs in the forests and we can continue, as we must continue, to protect that environment for future generations. I come back to the point I made before: it is vital for the timber industry to have resource security. The government, quite frankly, has been lax on this issue and there has been very little happening in the federal sphere. The lack of resource security means that many mills will not invest in new machinery or take on new employees.

Mr DEPUTY SPEAKER (Mr Newell)-Order! The time allotted for the remaining stages of the bill has expired. The question is that the bill be now read a second time.

Question resolved in the affirmative.

Bill read a second time.

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Garry Nehl MP Member for Cowper PO Box 1446 Coffs Harbour 2450

Dear Mr.Nehl,

Thank you for the copy of your recent speech on the timber industry.

1 Feb 94

We would make the following comments

-on what evidence do you base your claim that"there has been a tremendous loss of jobs in the logging industry....mainly because of extreme environmental activity" ? From records of the State Forests of both Kempsey and Macksville Management areas, where there have been no significant areas of timber land placed in National Parks for some years, there has over cutting of up to 43% in 87/88 and even up to 11% in 91/92 in the Macksville area. Couple that with over estimation of the yields -up to 45% in eg.the Carrai and it is obvious that some thing is wrong in the management of these public forests The worry is that some of this overcutting has occurred in the second cycle areas which means an even lower output for the years to come. Meanwhile the export of woodchips is increasing and you will be aware that throughout Australia the increase of wood production(including woodchips) has resulted in a cut of some 45% in the persons employed and the export of potential jobs overseas.

- "sadly ,the fanatical, extreme preservationists have been bandying about propaganda which has been very hurtful to the timber industry" We would be interested to know what this propaganda is and from whom it is coming. Much of the information that I have sent you has come from an analysis of the State Forest records .

- "stop these fools putting up tripods " You will I am sure remember that these tactics held the action so that the conservation movements could prove they were right in the Courts. It was proved that not only were the State Forests breaking the laws but even a Minister of the Crown was not acting in law when he failed to use the Heritage Act. You will recall the case in the forests above Bellingen where the State Forests had constructed a road which the "fools with tripods" brought to the attention of the Government and the public and where the State Forests decided to settle out of Court. These" fools" had been upholding the laws.

- "it does not mean leaving them in their pristine state to die" For thousands of years these forests have done very nicely in just such a situation. Why not keep some of these areas without human interference? We are not asking that there be no logging in the native forests but if you look at the economics of constructing roads into the remaining old growth areas and pulling out the logs on , in most areas very steep terrain, then the costs of plantations becomes far more realistic. But it requires a very long term commitment to forestry and most companies, understandably, want a quick return and therefore choose to log the last tree out of the

MACLEAY

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**INDUSTRY DEVELOPMENT OFFICE.** 

A division of the Macleay Business Enterprise Centre ACN 003 996 656

**PO Box 459** Kempsey NSW 2440

Phone: (065) 63.1896

5 January 1993

Environment

Industry

People

Garry Nohi MP Member for Cowper PO Fon 1446 Coft, Harbour 2450

Dear Mr. M. M. M.

Jim Tedder Thunk you for the copy of your recent up, charter the copy of your recent up. industry Stuart's Point 2441

We would mike the following commut.

on what evid.nce do yea base your claim that "there na been a trimendour loss of jobs in the loging inductry mainly because of extrem??DNITROPATIONAWAY ' from record: of the State Fore have been no significant areas of timber and the there there have been no submitteant areas of timber and the term of the set of the set of the set of the set of the treat where there have been no submitteant areas of timber and how the set of the treat the set of t Dear Jim, export contacts and is currently exporting fresh fruit and vegetable product to Asia. 14 ŦΧ This co-operative being close to Kempsey may provide the necessary outlet for you to 1111 develop a new market and the co-operative is keen to have as many people involved as possible to ensure economies of scale as many people involved as possible to ensure economies of scale as many people involved as tritic with tronoutility tritic the scale as many people involved as tritic with tronoutility tritic and involved as many people involved as tritic with tronoutility tritic and involved as many people involved as tritic with tronoutility tritic and tritic and the scale as a scale as entertain the thought of export. However, if quantity and quality can be provided the export market will give a much more stable market with fewer of the ups and downs of - the local market However, it is a market that you target and not one that you think at t about if you have product left over from other markets." Perhaps you may wish to 10 19 investigate the possibilities." The contact details are as follows:

FACSIMILE: 1, 119 110 the 168080 in 047725 of at nome on 095140 (12) For thousands of years these for one to be the former of t

Brian England (Manager)

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A jointly funded project of Kempsey Shire Council and the Federal Government

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native forests. But surely this is not the way to run a renewable resource ?

We are pleased that you support the concept of value adding but the export of woodchips is certainly not the way to go.

In our letter of 21 November we raised a number of points about the timber supply and the industry in general and in particular the decreasing role of the local independant logger and miller. We would welcome your considered opinion of these issues and how you may help.

Perhaps we could meet with you at some date suitable for your busy schedule ?

Yours sincerely

James O.Tedder Hon.Sec

draft of NC angelerbon Harmy strategy Pobot 6 Grafta 2460 the N.C.EC compatulates the Nott loast Repet Of Planning on the braft Ursan Planning Strategy. Because of the optensive consultation process it should receive broad public support We believe that the document convases the we veren mar me somment convoises the range of problems from the World Coast. Some aneas are already experience to problems outlined in 5the source of periods of the additions up to the addition of the source of the the problems. In the source of the source of the the problems. In the source of the source of the sense ignore prove of the ball of the source of the being ignore price of source of the ball of the source of the sense ignore prove of the source of the being ignore price of the source of the ball of the source of the ball of the source of the so North Borville urban denelopmet in Kosen habitat & Wetland. There are limits to growth and the determining factors can be water, land availability, ours to services, transport, sensitive enversamets etc. If these factors die ignore the results will be environmental a social degredation. The onerwhelming respons by the public to the issues raned in the discussion paper was the meservation of the anoronnest and social amonity both of which will be compromised by not putting threshoels on eatchments. We therefore believe that the Deptof Planning should, put the stralegies, into the Regional Environment Plan and instruct local councils to comply. It would be oftnendy name to believe that Councils will columnaily longshy with the Daft Unber Planning Strategy as quicking At it recent NCROC. planning conference Counit planness manates they would be planning derections. Those strategies affecting other Goremmet Depts should be directed by the min of be directed by the minister concerned to comply.

Jom farttyulf Hon Sec.

54 Skyline Crescent Crescent Head N.S.W. 2440 29.4.93

Mr. J.L.O. Tedder "WAINONI" Pavans Rd. Grassy Head Via Stuarts Point N.S.W. 2441

Dear Jim,

The recent article sent to me by you claims that small Sawmills in the Kempsey Area are closing due to overcommitment of resources to BORAL. This is not strictly correct, however what has constantly worried me is the useage by the Commission of these small millers for short term gain.

What most people do not realise is that the Kempsey sawlog allocations are made up of two components.

1) LIQUIDATION CUT

"Old Growth". or more correctly forests that have not been significantly harvested in the past, are slowly declining in total merchantable volume availability due to senescence. This is occuring as growth increment is matched by death and increasing defect.

Thus the volume that may be cut annualy from these forests is given by the following formula:

Annual Cut = LIQUIDATION PERIOD

It is usual to calculate the LIQUIDATION PERIOD such that at the end of the period, the annual yield can be replaced by the annual net merchantable growth on the regrowth forests.

2) SUSTAINED YIELD

The sustained yield of a regrowth forest is theoreticaly equal to the annual net merchantable increment of the forest.

THIS ASSUMES THAT THE FOREST HAS A "NORMAL" DISTRIBUTION OF SIZE CLASSES.

(Normal means a deLiocort or inverse J distribution) .

This is where Kempsey comes unstuck.

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#### REASONS

- a) The Liquidation period was shortened, so as to allow industry a "Phasing in" Period.
  (This generaly means industry will shut mills a little later)
- b) The Assessed Total Merchantable Volume of the uncut forests was overestimated due to areas not being economicaly, or environmentaly accessable.
- c) To Maximise revenue many additional sleeper cutters were allowed entry onto Crown Timber Lands.
- d) These Sleeper cutters were allowed to cut timber species which in all other Forestry Districts are considered Quota Sawlog species.
- e) The sleeper cutters were allowed to cut regrowth trees down to one or two sleepers in cross section.
- f) As the great majority of the coast and foothill regrowth forests are of the dryhardwood type that cuts durable sleepers, these forests were stripped of the size classes required to sustain the yield immediately following the liquidation period.
- g) The problem in the regrowth forests has been exaccerbated by three further actions.
  - Blackbutt forests are being thinned for pulpwood, with merchantable sawlogs not capable of further net merchantable growth being felled and removed with the intent of transferging increment to the retained sawlogs and just undersized sawlogs. As these forests must now be the first to be harvested, there is insufficient time available for this growth to transfer, let alone make up for the removed volume.
  - 2) Flooded Gum forests have been harvested for veneer Timbers.
  - Pole operations proceed without annual limitation to the extent that this industry has now all but ceased.

In essence the yield cannot be sustained, even at the proposed lower level, as the regrowth forests of the Kempsey area have been made depauperate in those size classes which will be required for harvesting in the short term, following the liquidation period.

I hope this assists you in understanding the position of yields

Joh Junto



The only measure of Diameter Distribution In Trempsey is about 25 plots. These plots have never been used for gield projection These plots have never been used to adjust expected management plan growTH increment
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Director Environmental Protection Agency Locked Bag 1502 Bankstown 2200

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Licences to Pollute issued to the Borestry Commission , Dear Director,

Our Council believes that licences issued last year to the Forestry Commission to allow the Commission to pollute waterways in NSW are due for renewal within a few weeks.

Before these licences are renewed we would urge the Agency to approach the matter in a more refined manner than the issue of the original licences.

It is suggested that all licences for renewal together with the conditions which are to be imposed be placed on public exhibition and comments sought from the community, before the licences are actually issued.

Secondly the conditions that apply should be closely tied in with the physical attributes of the area for which the licence applys. There are areas which we consider should not have conditions applied and others where perhaps no licence should issue.

Finally the Agency should consult closely with other Government agencies particularly the Soil Conservation, Water Resources, and the National Park Service before preparing conditions for the licences.

Yours faithfully

James L.O.Tedder Hon.Sec.

### NEW "COMMON OWNERSHIP" GUIDELINES

### FOR RURAL PROPERTIES

### From Nimbin News, October 1979

### AT LAST - P.E.C. POLICY ANNOUNCED

Those readers and others who have been following the progress of H.B.A. negotiations will know that Council, although urged by the Planning and Environment Commission to state its policy re Hamlet Zoning, and to suggest amendments to the Interim Development Order, have insisted that it would do nothing until the Government had declared its policy. Now this has been done, and the P.E.C. has adopted a policy, endorsed by the Minister, embracing a range of possible life-style situations including commune living and clustered dwellings on farms. The policy is as follows:-

### MULT IPLE OCCUPANCY OF FARMS: INTERIM POLICY

"The commission supports: the single or multiple occupancy of a building or buildings, in groups or otherwise, on rural properties in "common ownership", as an appropriate concept for rural areas subject to compliance with the following requirements.

- a) the land to be suitable for the purpose, having regard to its character, area, location, capacity to accommodate additional population, and to its relationship to community facilities and services and existing and future land uses in the locality;
- b) the development will <u>maintain or enhance the environmental quality of</u> the land.
- c) <u>future subdivision of the land to be prohibited</u> (to be implemented by way of covenant or title);
- d) the development to have <u>reasonable all weather access</u>, <u>adequate water</u> supply and wast disposal facilities, and not to unreasonably increase the demand for community facilities and services.
- e) the development not to pose undue fire risks to occupants or to adjoining properties;
- f) the land to have a <u>general minimum area of 40</u> ha, with an absolute minimum of 20 ha where such is the prevailing subdivision lot size in the locality;
- g) <u>prior advertising</u> of the proposed development locality, together with due consideration of any representations received particularly with regard to the implications for adjoining property owners;
- h) at least one of the buildings to be occupied by an owner(s)."

The policy statement continues with two further points:

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• "In order to reduce Commission involvement in dealing with subsequent multiple occupancy applications in the same local government area, an enabling clause applying to the whole area should be used with the administration of the policy being left to Council. The Legal Branch has been requested to prepare a standard clause embracing matters (a) to (h) above.

@1001/001

# ACF

Australian Conservation Foundation (A.R.B.N. 007 498 482) 1st Floor, 98 George Street, Sydney NSW 2000 Telephone: (02) 247 4285 Fax: (02) 247 1206

### 27/7/93

Mr George Souris Minister for Water and Land Conservation Level 3 State Office Block Phillip Street SYDNEY NSW 2000

Dear Mr Souris

RE: Meeting with Australian Conservation Foundation

The Australian Conservation Foundation would like to place the following matters on the agenda for our meeting with you on Tuesday 24th August at 3pm:

- \* Implementation of the National Forest Strategy including price reform and accounting and a moratorium on old growth logging.
- \* Regional Assessment Process in NSW and progress on addition of wilderness, high conservation value forest areas to reserve system.
- Protection of water yield and water quality values in forested catchments (including Dorrigo)
- Research in Forest hydrology.
- Feasibility study for Hardwood Plantation establishment in NSW.
- \* Victorian Auditor General's Report on Victorian Timber Industry Strategy.
- Progress on Public Accounts Committee Review of NSW Forestry Commission.
- Institutional Arrangements for Management of Water Resources in NSW.
- Cubbic Station proposal for 100 000 ML private dam and implications for NSW.
- South Australia's call for moratorium on water allocation.
- ACI: campaign direction 's.

Incerely ours 5 Salmí National Campaign Convenor



PARLIAMENT OF NEW SOUTH WALES LEGISLATIVE ASSEMBLY

MEMBER FOR OXLEY

Electorate Office 37 Elbow Street West Kempsey 2440

P.O. Box 120 West Kempsey NSW 2440 Tel: (065) 62 6190 Fax: (065) 63 1355

4th August, 1993

Mr. James L.O. Tedder, Hon. Secretary, North Coast Environment Council Inc., Pavans Road, Grassy Head, VIA STUARTS POINT. 2441

Dear Mr. Tedder,

I acknowledge receipt of your letter dated 30th July, 1993 seeking a meeting with the Minister for Land and Water Conservation, The Hon. George Souris, M.P. It is noted your association is supportive of a viable forest industry.

Please be advised that I have made representations to the Minister, on behalf of your organisation, advising that a delegation is prepared to travel to Sydney at his convenience.

As soon as I have the Minister's response I will contact you.

Yours sincerely,

Ĵeffeŗý, M.P., Brucé

Member for Oxley.

BJ:mb

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## MINISTER FOR LAND AND WATER CONSERVATION

Mr James L O Tedder Honorary Secretary North Coast Environmental Council Pevans Road GRASSY HEAD via STUARTS POINT 2441

Dear Mr Tedder,

I refer to your letter of the 1 July 1993 concerning logging on freehold lands and the level of participation by goverment regulatory bodies.

The Department of Conservation and Land Management (CaLM) becomes involved with private property logging on lands that have been mapped as 'protected land' under the Soil Conservation Act, 1938. Those landholders require approval prior to the removal of trees from such lands. CaLM will normally attach a set of conditions with the Authority to remove trees from protected lands which will ensure operations pay special attention to the mitigation of erosion on roads and log extraction tracks. They, if required, will include "exclusion zones" whereby rainforest associations and "special trees" have logging prescriptions imposed In order to avoid disturbance in such zones.

Prior to logging commencing, the proponents of the proposed logging operation will have to meet statutory requirements administered by government departments not within my portfolio. This may include obtaining a Pollution Control Licence in accordance with the requirements of the Clean Waters Act and adhering to any special conditions imposed by the Environmental Protection Authority. The proponents will also need to satisfy the requirements of the Endangered Fauna (Interim Protection) Act administered by the National Parks and Wildlife Service.

The logging of private property may also require the lodgement and approval of a Development Application with the Local Goverment administrators. That Council may impose additional conditions on logging if it considers necessary. The Council may also request that additional environmental assessment is undertaken by the proponents in the form of an Environmental Impact Assessment.

- 2 -

The NSW Forest Products Association, Forestry Commission of NSW and CaLM have jointly developed a draft document which aims to guarantee a high standard of forest operations on private lands. The document, Private Property Logging Protocol (PPLP), contains many components which will assist both Logging Contractors and Land Owners maintain and improve environmental and operational performance on private property. The PPLP will include a Code of Practice for Private Property Logging Operations, a guide to the preperation of Timber Harvesting Plans and a guide to Endangered Fauna Assessment.

The Government also plans to establish a Forest Policy Unit in CaLM which will be responsible for the development and review of legislative proposals affecting forestry and ensure consistency of codes of forest practices across Forestry Commission and private sector interests. The Unit will consult widely to ensure policies are relevant to the community, industry and the Government.

Yours sincerely

Souris, MP ae

make Ockwell - carm



### MINISTER FOR LAND AND WATER CONSERVATION

NEW SOUTH WALES

30 JUL 1993

Mr James L O Tedder Honorary Secretary North Coast Environmental Council Pevans Road GRASSY HEAD via STUARTS POINT 2441

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Yours sincerely

George Souris, MP

## Forestry Commission of N.S.W.



Forestry Office Northern Region PO Box J19 Coffs Harbour NSW 2450

Attention J Tedder Honorary Secretary North Coast Environment Council Inc. Pavans Road Grassy Head Via Stuarts Point NSW 2441

Your reference:

Our reference: RO 639

066 528900 Telephone: 066 512909

Fax Contact Officer: Mr S Hutson

13.04.1993

Dear James,

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Thank you for your letter of the 15th March 1993.

We recognise just as you do, the need to resolve contentious issues associated with the management of State Forests in Northern Region and establishment of meaningful dialogue with interest groups.

To enable further consideration of your proposal it would be appreciated if you could comment or advise on the following points:

- (i)the proposed size of the consultative committee and make up?
- (ii) to enable a more balanced representation of principal interest groups will NP&WS, CALM, Environmental Planning Authority, graziers, bush fire committees, Chamber of Commerce be invited to participate?
- (iii) objectives of the committee? Is it an advisory/consultative /decision making forum?
- (iv) anticipated frequency of meetings.
- an indication of the scope/areas the committee intends to consider. (v)

I would welcome the opportunity to discuss the matter further with you.

Yours sincerely

for

MIKE ROWLAND Planning Manager Northern Region

15/3/93.

Mr Grahame King, Northern Regional Manager, Forestry Commission of NSW, Coffs Harkeur.

Dear Sir,

The North Coast Environment Council sees it as essential to adopt precesses in northern NSW that can begin to resolve the conflicts that have characterised forest issues in recent years.

To this end NCEC requests that a consultative committee be established for the Forestry Commission's Northern Region. It is considered essential that this committee have a balanced representation of the principle interest groups and strive to reach consensus where possible to ensure no group feels that they are over ridden by the process.

It is considered necessary to start with a simple structure for the committee to give the process a sound footing from which a broader consultation process can evolve.

It is thus suggested that the initial composition of the proposed consultative committee be 2-3 representatives from each of the forestry Commission, National Parks and Wildlife Service, North Coast Environment Council, timber industry (including the Forest Products Association to represent quota sampillers and a representative of non quota sampillers) and an independent facilitator acceptable to all parties.

The purpose of the proposed committee would be to commence dialogue between the principle interest groups and discuss a variety of issues as necessary to see if @@nsensus can be reached on action to be taken in respect to specific issues. For the pracees to work it is essential that all pertinent information be made freely available to the committee.

Agendas for the committee should be up to the committee to decide, though issues we would like to see addressed include: meaningful public involverment, oldgfowth forest, rainforest, logging prescriptions, ecologically sustainable forestry, timber allocation and future options.

We hope that you may be interested in this proposal to establish some meaningful dialogue and develop means of resolving some of the many contentious issues associated with north east forests.

Yours sincerely,

J.L.O.Tedder, Hon.Sec.



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# LOCAL GOVERNMENT ASSOCIATION OF NSW



### SHIRES ASSOCIATION OF NSW

PO BOX 364 CLARENCE ST NSW 2000 DX 1346 SYDNEY

Local Government Centre 215 Clarence St Sydney PHONE (02) 299 7711 FAX (02) 262 1049

Our ref: R94/0030 Further contact: John McSullea

8 April, 1994

### SPECIAL CIRCULAR

All General Managers/Mayors To: Lord Mayor's Bush Fire Relief Fund Subject:

In January this year the Lord Mayor of Sydney invited submissions from councils for funding from the Lord Mayor's Relief Fund. Seventy (70) submissions were received seeking about \$5M. However, not all councils responded and some submissions required instification



NEW SOUTH WALES

MINISTER FOR CONSERVATION AND LAND MANAGEMENT AND MINISTER FOR ENERGY

7065G

Ms Lyn Orrego PO Box 123 BOWRAVILLE NSW 2449

30 OCT 1992

Dear Ms Orrego

Thank you for your letter dated 23 September 1992 urging the Forestry Commission to support your proposed assessment of old growth within Wild Cattle Creek State Forests.

It is my understanding that the Forestry Commission has responded to your invitation in their letter dated 12 October 1992.

I am satisfied that the Environmental Impact Statement (EIS) programme underway in the Dorrigo Management Area involves an appropriate level of flora and fauna assessment of old growth forest to describe the impact of forest management on all forest values. I do not agree that additional studies as described by you are required at this stage.

However, the NCEC will have the opportunity to comment on the Forestry Commission's EIS assessments when it goes on public exhibition.

Yours sincerely

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Garry West, MP MINISTER FOR CONSERVATION AND LAND MANAGEMENT AND MINISTER FOR ENERGY

> Level 2, 151 Macquarie Street, Sydney Australia, 2000 Telephone: (02) 251 8498 Facsimile: (02) 251 1442

# **Greens join forestry outcry**

### By LENORE TAYLOR

CONSERVATIONISTS have joined the forestry industry to condemn a recent list of forests proposed by the Minister for the Environment, Mrs Kelly, for protection under an agreement between the Federal Governsment and the States.

<sup>ni</sup> Mrs Kelly recently angered the timber industry and ALP candidates in marginal seats by writing to State governments proposing logging temporarily stop in a long list of forests while a new permanent national reserve system was finalised. She was later forced to write to Labor candidates in several marginal timber seats explaining the list had been intended only as a starting point for the negotiations on the new reserve system, and saying it was "unfortunate" it had caused "community concern".

But yesterday the co-ordinator of the North East Forestry Alliance, Mr John Corkill, a lobbyist concerned with forestry in two of the northern NSW seats where the list has caused industry concern, said he agreed with the timber industry the list was "an ambit claim far in ex-

cess of what is required for protection".

"I can fully understand why the industry is so upset because those lists have no credibility, they nominate whole forests which have been logged for years and which are not of high conservation value," Mr Corkill said.

"I can tell you that the ALP's credibility on logging and on the environment will be huge issues in (the northern NSW electorates of) Page and Richmond and her list is just not credible."

Mr Corkill was also angered because, in her letter to the can-

didates backing away from the original letter to the State Governments Mrs Kelly said the Commonwealth had no intention of forcing the protection of the forests.

He believes the Commonwealth should be prepared to enforce the protection of more limited areas of high-conservation value forests.

A spokeswoman for The Wilderness Society, Ms Karenne Jurd, said the organisation had supplied lists of forests to Mrs Kelly for inclusion in the letter. Mrs Kelly's department had asked for the advice but she was unaware whether it had been followed, she said.

The minister had been "entirely correct" to write to State governments proposing the protection of the forests while a national reserve system was set in place.

The National Association of Forest Industries has written to the Prime Minister, Mr Keating, complaining about the lists and asking for clarification.

The association said the lists were "so wide-ranging they would lead to the closure of the industry in large parts of Australia".

# ries reopen book on our natural heritage



laby from north SIMON BULLARD

d been overlooked

told The Weekend Australian. But when the researchers analysed their chromosome makeup they found they were a distinct species. Interbreeding trials confirmed this. The wallables have been officially named and described in the latest issue of the Australian Journal of Zoology. The new species are:

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Petrogale coenensis, or the Cape York rock wallaby, a rare species known only from nine specimens from three localities and apparently restricted to a small area of eastern Cape York near Coen.

Petrogale mareeba, the Mareeba rock wallaby, confined to small areas of the Atherton Tablelands west of Cairns.

Petrogale sharmani, the

and named after Macquarie University professor of biology Geoff Sharman, who pioneered the genetic study of rock wailabies.

Dr Eldridge said researchers had for some time suspected the wallabies were distinct. but so similar were they in size. fur colour and skull shape to other wallables it had not been possible to prove their distinctiveness until the use of genetic molecular analysis.

This revealed they were cryptic species and quite separate, despite their strong physical resemblance. They had differences both in the number and shape of their chromosomes from those of other wallabies.

wallabies and found the hybrid male offspring were sterile and the female offspring either sterile or reproductively impaired. This is generally regarded by scientists as evidence animals are from distinct species.

"As humans, we tend to as- preservation. sume that everything sees the world as we do, because we operate on strong visual cues." Dr Eldridge said.

on olfactory cues, which means they are probably well aware they are from different species although to us they look the same.

"This raises the intriguing probability that there are quite a few more undiscov-

more obvious that there are quite a lot of cryptic species and discoveries will continue." Dr Eldridge said the knowledge an animal was from a distinct species, as opposed to a race of a more common species was important to its

"It is vital to know where they are. If they are confined to a small area, one major development could knock out an "But animals mostly operate entire population," he said.

More than 10.000ha had been cleared by a single land developer in an area very close to where the Mareeba rock wallaby was found. which underlined the vulnerability of cryptic species.

"Regrettably, it also means a meanopoids lot of an

Meanwhile, Queensland Department of Primary Industries scientists yesterday announced the discovery of a new species of golden perch or yellowbelly, a freshwater native fish. 

Dr Clive Keenan and Mr Mike Musyl used genetic tests to show that golden perch in the Lake Eyre basin in central Australia were a distinct spe cies from those in the \*\*\* Murray-Darling system. 

They had also established that golden perch from the Fitzroy River in Queensland were a subspecies.

14 × 18 The work showed the Lake Eyre and Murray-Darling, perch species became sepa-



Sec: Mr Jim Tedder Pavaans Rd Grassy Head via Stuarts Point 2441

Reply to: the undersigned

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September 23, 1992

Mr. Hans Drielsma Chief Executive & Commissioner for Forests, Forestry Commission of NSW, Building 2, 423 Pennant Hills Rd., <u>Pennant Hills NSW 2120</u>

### URGENT

Dear Sir,

re: Invitation to support scientific assessment of old growth forests within Wild Cattle Creek State Forest

I write on behalf of our council to urge your open consideration and acceptance of the invitation from the North East Forest Alliance, supported by NCEC, for the Forestry Commission to support and participate in a scientific assessment of old growth forest within Wild Cattle Creek State Forest (see attached copy).

Despite logging continuing in compartment 546, we feel the study is still crucial. We understand a scientific methodology for identifying old growth forests has been agreed to by scientists and community groups yet the Forestry Commission has not applied this nor do they assess areas before logging proceeds. Until this is done the conflict in the forests will continue. Wild Cattle Creek State Forest offers an opportunity to pioneer this type of assessment. If worked out successfully it will be able to be applied in other areas and will be like handing over decisions on controversial areas to the scientific umpire.

We understand the Forestry Commission has available to it the scientific expertise, knowledge and experience of the Victorian methodology to enable these assessments to go ahead. If the Commission says no to the invitation to work with NEFA and others on this project they will be seen by the community as rejecting a viable solution to the longstanding and costly conflict over the forests.

As NEFA, supported by NCEC, are intending to commission this assessment in any case, the Commission will find themselves presented with an independent, scientific report which they will have to take into account anyway. Surely the best option is to co-operate through the whole process by doing it jointly, developing trust, and thus all parties having faith in the outcome.

We urge you to let us know of your willingness to accept the invitation as soon as possible. We view this whole project as vital regardless of the logging program the Forestry Commission is pursuing. Of course, the sooner it is completed the better so that the information can be taken into account in deciding the future logging program.

Our call for this assessment to be done is based on the Commonwealth Resource Assessment Commission (RAC)'s Final Report (March 1992) recommendation for the preparation of comprehensive regional management plans that identify and rank old growth forests in terms of their range of values and the protection of sufficient old growth areas within conservation reserves. RAC says that future possible old growth logging should only occur <u>after</u> this has been done and where no alternative resources exist. (RAC Vol 1. p. 27)

As the Commonwealth Government is recommending these assessments be done and should the NSW Forestry Commission agree we suggest the FC could have a valid claim on the Federal government for funds to carry out the recommendation. It should be noted that the assessment process pioneered in Victoria maps all forests by growth stages and thus will also serve to assess and locate timber resources.

Thank you for considering our comments and request. It is our sincere attempt to resolve this conflict for the benefit of all parties and our unique Australian heritage, our old growth forests. We await your considered response.

Sincerely, Lyn Orrego Vice President

Reply to: Lyn Orrego P.O. Box 123 Bowraville 2449 NSW

Attachments: 2 pages

### MANAGING DIRECTOR'S COMMENTS BY BRUCE R. KEAN

16 Nov 92

Thank you Chairman. Ladies and Gentlemen, as part of the strategic planning process, the Board has adopted a policy of globalisation and encouraged management to have a very focused approach on customer service and productivity in every business and in every country in which Boral operates. Capital investments and acquisitions are all aimed at enhancing shareholder wealth through growth and developing competitive advantage.

In the Company's long term interests, we have determined that around 75% or more of earnings should continue to be derived from Australia. In line with this strategy, we are continuing to develop our presence in North America, Europe and Asia as well as Australia and seek out opportunities for growth within those regions. At the present time, opportunities are arising for industry rationalistion and for acquisitions which will enhance the value of our existing assets. Since year end, we have continued to invest and I am pleased to summarise these latest developments in your Company.

In Australia, we have been seeking opportunities to expand our timber operations in an environmentally sound way for some time. The decision by Pacific Dunlop to divest the Petersville Sleigh timber operations presented such an opportunity. The operations which we acquired comprise hardwood processing in northern NSW and Tasmania, softwood processing in southern NSW and hardwood woodchip exporting from Tasmania and the price paid values the assets of those operations at \$158 million. As with Boral's existing operations, no timber is taken from rainforest areas and all logging is carried out to standards set by the State Forestry Commissions and within the limits of environmental impact statements and licences based on them. In short, we adopt the world's best practices to achieve sustainable yields of commercial timber whilst protecting the environment. In Tasmania, we maintain a substantial forestry research unit and nursery and we plant far more trees each year than we harvest.

We have also further enhanced our windows business by acquiring from Comalco the Wunderlich aluminium window and door businesses in NSW, Queensland and Tasmania. At the same time, Comalco have purchased our excess extrusion capacity in Sydney. As a result, our South Australian extrusion and finishing plant will now be fully utilised to service the expanded window fabrication business.

Growth through acquisition is, however, not pursued to the detriment of expenditure on our existing operations. In the western region of Sydney, a new \$40 million clay brickworks is expected to be completed in 1993 and a \$15 million concrete products plant is also being constructed to replace existing facilities. These two new facilities will ensure that we have the most flexible and lowest cost operations to underwrite our competitive advantage over the next decade.

In Europe, we have acquired a modern concrete masonry plant near Manchester in England which will allow us to close down two older and smaller plants in the region. This rationalisation is complemented by the upgrading and expansion of another plant in Derbyshire which was commissioned recently.

On the Continent, we have in recent weeks purchased four sand and gravel quarries near Berlin,





A public meeting was recently held by Lismore City Council to gage public feedback about the introduction of a \$12.50 garbage levy to fund recycling.

There was widespread publicity for the meeting in all forms of the media, but the turn out was somewhat/dissappointing. Only 41 people actually attended the meeting, and of those only a few were 'recyclers'or 'greenies'.

Not surprisingly, the issue of the levy was hotly debated. It was interesting to nore that more people seemed concerned about potential changes to their wheelie bins than they did to the introduction of the levy - and the meeting voted favourably for Council to apply to the government for the levy to be introduced.

I must admit as a representative of the environment centre I felt that we should have had more support at this meeting to show council that their is strong community support for the introduction of recycling.

ASide from that the decision to go with the levy shows the obvious community support for recycling in the area. Whilst no decision has been made about how Lismore will recycle - the Waste Management Advisory Committee (WMAC) will continue to consider options and investigate possibilities.

Other issues the WMAC has been working on include composting, worms, chemical issues, isposable nappies and information exchanges.

For any more information about the committee rease feel free to contact me (sam) at the centre.



# Boral : plundering our heritage and destroying Aussie jobs

### **\*Boral Market Domination**

\*Borals takeover of Duncans holdings has given Boral domination of the North Coast timber market.

\*Boral now controls 62% of sawlog quotas in Coffs Harbour forestry region & >80% in the neighbouring Port Macquarie Region.

\*Boral controls 78% of the Grafton sawlog quota

### \*Boral, a history of anti competitive practices

The Royal commission into the NSW building industry concluded that Boral had engaged in anti competitive practices in two significant markets for building materials, Boral is now set to extend this monopolistic grip into a third sector.

### \*Resource Security + Market Domination = Monopoly over public forest estate

The NSW governments proposed resource security legislation combined with Borals timber monopoly would have the effect of permanently locking up the publics forests for the almost exclusive benefit of one multinational company, It has all the signs of being a "sweetheart deal" between Boral and the NSW coalition government.

### NEFA refers Boral monopoly to Trade Practices Commission

Nefa referred the matter to the Federal TPC which despite the clear evidence has failed to continue with investigating our complaint. Now its back to direct action and public education.

### Boral, woodchipping our heritage

Boral has a monopoly over export woodchipping on the North Coast. Woodchips account for more than half of Borals timber based profits, Boral converts more sawlog quality timbers to woodchips than any other miller on the North Coast. Woodchipping is a highly environmentally destructive, low employment generating and a low value added form of timber usage.

### **Boral : The Japanese connection**

Boral exports woodchips to Japan, and a significant portion of Boral is Japanese owned.

### Effects on employment

Boral has not denied that it's takeover of Duncans will involve "rationalisation' of mills. This means that mills will close and jobs will be lost. The Forest Products Association and Forest Protection Society are quick to fabricate job loss claims over environmental issues, but when it comes to a real threat to jobs from Boral it is left up to environmentalists to protect the jobs of Australian workers. Borals timber extraction sector is non unionised and is characterised by low pay long work hours and inadequate safety precautions.

# **CARRAI PLATEAU**

### Appalling fauna management by Forestry Commission.

The Eastern Quoll was presumed extinct for twenty five years throughout mainland Australia until several reliable sightings in the past two years rekindled hope that a population may remain in the Carrai and Petroi plateau areas west of Kempsey.

Ongoing logging operations in old growth forest on the Carrai Plateau are potentially destroying the last habitat of the Eastern Quoll, as well as a host of other endangered species.

Two months ago NEFA activists successfully blockaded logging operations by Boral in the Carrai plateau. A bulldozer was captured and used as a bargaining chip until the Forestry Commission agreed to stop work. Eventually the Commission agreed to conduct surveys for the Eastern Quoll and logging was stopped at least until October this year whilst surveys were conducted.

The Commission inevitably conducted the most minimal surveys possible, failing to even employ the methodology recommended by their own wildlife consultants and refusing to do night surveys or even wait for the result of hair tube analysis. Nevertheless the surveys did confirm the Carrai Plateau as an area of critical importance to a range of endangered species.

On 8 October the Commission recommenced logging on the plateau in contravention of guidelines contained in the Fauna Licence issued in respect of the area.24 hr police protection was immediately applied to the site to prevent blockade estblishment. The Commission also moved two dozers into the area so that destruction could be completed as quickly as possible. Despite the police presence blockaders successfully closed the road and stopped work for two days. Eventually after 23 arrests and more police in the area, work recommenced.

Late on Friday Oct 16 the Director of the NPWS moved to vary the conditions of the fauna licence to make the conditions more specific so they would be legally enforcable. This has had the effect of stopping work by requiring that the Commission undertake the required surveys for Yellow Bellied Gliders and Sooty Owls.

The situation is now very much touch and go, with the NPWS under severe pressure from National Party cabinet ministers over the decision.

NEFA is currently preparing an information package which reveals the extent of mismanagement in the Kempsey area, in which the Forestry Commission has overestimated timber resources for many years and even after discovering their own error have failed to insist on quota reductions needed to achieve sustainable yield.

NEFA is calling for a parliamentary inquiry into mismanagement by the Forestry Commission and has referred the matter to the Ombudsmans office.Lack of resource in Kempsey was blamed on endangered fauna legislation during the debate over the Timber Industry (Interim Protection) Act earlier this year, it now appears the Forestry Commission misled the parliament on that occassion.

## Worms worm worms

As you can see by the insert in this newsletter, the issue of worms will be hitting Lismore in a big way on October 27.

Earthworms are used for a variety of reasons. Fishermen, gardeners and farmers use them, as well as enthusiastic home composters who value the 'vermicompost' they produce. The advantages of earthworms in soils are manifold, particularly in regards to improving soil fertility and breaking down organic matter.

If your interest is to breed worms as a method of diverting all surplus organic materials you generate (often called household garbage) into a viable, safe plant nutrient, there are a number of factors to look for.

Firstly you should look at how much kitchen waste you will generate in a week. This will give you an idea of how many worms you need and what the size of you bin should be. The number of worms initially required can be based on two factors: a) the average amount of food waste to be buried per day, and 2) the size of the bin. Since the size of you bin will be based on how much 'garbage' you expect to bury, the amount you will be burying is the crucial factor.A "worm garbage ratio" of 2:1, based upon the initial weight of worms and the average daily amount of garbage to be buried is suggested.

Next you should decide which worms to use to create your 'vermicompost'. Tiger worms and red worms are the most commonly used, and the most suitable to household compost. Both red and tiger worms are available from worm farms around the north coast.

Once you have decided on these basics other considerations necessary include locating the site, deciding upon the size and type of container to be used, and providing some bedding material. There are as many bed sizes, shapes and positions as one can imagine their circumstances dictating. All designs need to consider drainage, moisture and temperature. A bed can be kept outside anywhere where it is protected from direct sun, frosts and preferably from rain.

Choosing a container is where a lot of the decision making and postulating takes place. There are several different alternatives - different sizes, shapes and so on. Containers should be matched to the size of your proposed operation. There are some especially designed containers on the market, or you can make your own.

The major task remaining is to set up your worm bin with appropriate bedding. A worm's body t be moist in order for the worm to 'breathe'. Bedding therefore should have a high water content. Cow and sheep manures are the best materials. MT ROYAL MANAGEMENT AREA, FORESTRY COMMISSION OF N.S.W. ENVIRONMENTAL IMPACT STATEMENT (EIS) and FAUNA IMPACT STATEMENT (FIS).

### SUMMARY OF OBJECTIONS

NOTE: Send objections to the EIS/FIS to the Forestry Commission, Locked Bag 23, Pennant Hills, NSW 2120, to be received by November 17th. Submissions should be clearly labelled Mount Royal EIS/FIS, and should demand that the Minister for Planning not allow the logging to proceed and the Director of National Parks and Wildlife Service should not issue Fauna Licences for the operations. The remaining Mt Royal old growth forests should be incorporated into the Barrington Tops National Park which adjoins. The Forestry Commission will forward copies of letters and submissions received to the Department of Planning and the NPWS.

1. New legislation now requires the Forestry Commission to prepare a FIS regarding impacts on fauna of logging operations in order to obtain a Fauna Licence from the NPWS with respect to proposed operations. The FIS is included in the EIS. The EIS and FIS are not independent studies, but are undertaken and prepared by the Forestry Commission themselves. Consequently they are not objective assessments of likely environmental impacts and they always conclude that the proposed logging should proceed, regardless of the evidence. The lack of honesty and objectivity and proper scientific rigour of these assessments is responsible for their most basic errors and deficiencies, and is a major basis of objection to the EIS and the FIS.

2. The EIS and FIS state that the lack of pre-logging data, including even adequate data on past logging methods, and "substantial differences between major environmental features of previously logged and unlogged areas" in the Management Area, means that it is not possible to assess the impacts of the proposed operations on flora or fauna. In other words, the EIS and FIS admit there is insufficient data to support their conclusions that impacts of the proposed operations are not likely to be significant!

3. The EIS misrepresents the proposed operations as "selective logging", and does not discuss or attempt to assess the impacts of the proposed intensive, integrated sawlog/pulplog harvesting. Consequently, insofar as impacts of logging operations are considered in the EIS, the assessment and conclusions do not apply to the proposed operations.

4. Apparent errors and anomolies in the site selection upon which the flora and fauna survey plots were based cause the difference between the comparative value as fauna habitat of logged and unlogged forest in the area to be significantly understated. Consequently conclusions drawn in the EIS and FIS concerning the likely impacts of logging on certain species of fauna, most notably arboreal mammals, are unsound. This is perhaps the most fundamental source of error in the survey methodology, which invalidates conclusions drawn in the FIS and the EIS. 5. Even without correcting for these errors, the Fauna Survey Census found that 80% of the Yellow-bellied Gliders, all the Koalas, 60% of the Greater Gliders and 80% of the Brushtail Possums recorded in the survey were in the unlogged forest plots. Consequently the finding of the EIS that logging impacts are not likely to be significant is not even consistent with the data in the fauna survey with regard to

these species. 6. If this is so it would appear that the impacts of logging on other species, such as Owls, is also likely to be significant.

7. The EIS and the FIS make a number of false and misleading claims about measures proposed to conserve flora and fauna:

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(a) the EIS suggests a significant area has been excluded from logging as part of special "safeguard measures" to conserve species. In fact the difference between the area excluded from harvesting by the routine prescriptions in the Management Plan and the area now proposed to be excluded is negligible.

(b) the "reserves" are in fact temporary Preferred Management Priority, classifications which do not provide the legal protection afforded, for example, to Flora Reserves. It is misleading to call them "fauna reserves".

(c) the "safeguard measures" are clearly and demonstrably inadequate to conserve species of fauna. The "reserves" are absurdly small and the "corridors" are merely rainforest filter strips unsuitable for many species - it is misleading to call them "wildlife corridors". (d) the EIS omits to state explicitly that logging is permitted in filter strips; since much emphasis is placed on the value of these strips as refuge and corridor, this is a significant and misleading omission.

(e) the Fauna Impact Statement (FIS) is unjustifiably complacent about likely logging impacts and routinely draws inadequately supported conclusions - for example: "Food resources for this species (Glossy Black Cockatoo) are expected to be either unchanged or enhanced by logging"; "the mosaic of logged and unlogged areas and reserved areas should ensure its (Tiger Quoll's) survival"; "the development of a grassy understorey under a more open canopy would be expected to favour this species (Rufous Bettong); "In the long term, disturbance due to logging and fire is thought to increase habitat for grazers and browsers by increasing the productivity of the understorey layer. After logging, as thicker regrowth replaces grassy undertorey, a number of grazers such as Red-necked Wallabies may decline relative to browsers, such as Swamp Wallabies"; "The fact that it is found in logged areas suggests that forestry pratices may not place (Hastings River Mouse) at risk. Its preferred habitat, near creek banks, will not be disturbed by logging machinery;' "The Mount Royal area has been subject to the same fire regime as is scheduled by the Forestry Commission for at least 100 years. Therefore, the impact of prescribed burning in the area is thought to be small"; "no species will be eliminated or severely reduced in populaton size over the entire area... and where there is an indication that resources from old trees are required, management plans have been formulated to retain these resources;" "in conjunction with nearby reserves, the overall effect of forestry operations will not result in permanent reduction in the distribution of any endangered wildlife species."

(f) There is insufficient evidence presented to support these conclusions; material presented is inconsistent (for example, it is asserted that logging will produce a grassy understorey, then that it will lead to the replacement of grassy understorey by thicker regrowth); and research studies of the impacts of logging on fauna contradict these conclusions. The FIS is, quite simply, a dishonest and biassed attempt to justify logging.

8. The EIS claim that standard erosion mitigation prescriptions will ameliorate impacts on erosion and water quality is not supported by evidence and it would appear that such impacts have been and will be highly significant.
9. The impacts of frequent burning and grazing are not adequately assessed; studies and other evidence suggest the impacts of these to be significant.

10. The EIS does not attempt to address the cumulative impacts of successive cutting cycles, and therefore is inadequate as an assessment of likely medium to long-term environmental impacts.

11. Only two studies using pre- and post-logging survey data have been undertaken to assess the impacts of logging in NSW forests. Both studies found significant impacts, and consequently the EIS makes no reference whatsover to these studies. Since the major purpose of the EIS is to assess environmental impacts, this is a major deficiency.

12. A growing body of literature exists reporting studies into impacts of logging operations and aspects of management such as burning and grazing on forest ecosystems, flora and especially fauna. There is scarcely a study from this literature reporting adverse impacts cited in the EIS. Most are not mentioned at all, or even cited in the EIS Bibliography or the FIS references. This is further evidence of lack of objectivity and proper scientific diligence.

For further information write or phone: North East Forest Alliance, Hunter Region P.O. Box 9 Singleton 2330. Phone: (065) 77.3105 Donations towards legal and campaign expenses are needed and much appreciated.

MISMANAGEMENT OF HUNTER REGION STATE FORESTS.

### SUSTAINED YIELD

In 1981 the then NSW Commissioner for Forests Dr Gentle told senior Commission officers:

"The statistics that come out of the Management Planning Division indicate without a doubt that our big management areas are being over-cut... What you should be doing on the quota side is definitely to pull things back towards the sustained yield principle which is really the corner-stone of all forestry at the field management level." (Public Accounts Committee Report, Dec.1990). Nevertheless overcutting continued throughout the eighties, as conceded by then Minister Ian Causely in 1989. The PAC Committee noted "the Commission's continuing failure in 1990 to fully address the need to reduce quotas. In the Committee's view, the entire issue of sustainability and the future of the native forest resource raises very grave doubts about the Commission's ability to plan for the future". (PAC, 1990)....

The Commission routinely overcut native forests in operations showing a net financial loss. Currently whilst the Commission talks about "ecological sustainability" and a "sustainable yield strategy", forests are still being cut at grossly unsustainable levels, and at a loss. The policy seems to be to keep quotas high and cut the old growth as fast as possible, and then reduce quotas towards more sustainable levels from the regrowth.

### MOUNT ROYAL MANAGEMENT AREA

The Mount Royal State Forest has been subjected to gross mismanagement by the Forestry Commission in past decades. The Commission's own regulations and guidelines requires: (Quotes are from the Mount Royal Management Plan 1988)

\* harvesting yield from forests to be "adjusted to the sustainable capacity of the forest" and operations shall minimise damage to the forest environment; and filter strips along watercourses and sensitive exclusion areas to be observed and erosion mitgation measures implemented;

\* that the forest resource be studied and inventoried for its values and characteristics and operations conducted in such manner as to "retain the range of forest types and their ecological viability"; and to "maintain a diverse habitat for viable populations of indigenous wildlife";

\* the Commission to "maintain any significant or rare ecological, floral, faunal or other scientific values"; and to "retain trees of value for wildlife habitat" and establish reserves to conserve representative samples of flora and plots to monitor growth rates;

\* that measures be taken to "minimise the loss of forest values resulting from wildfire" and "conserve catchment values", and to monitor harvesting operations and market forest products to "maximise financial return to the State" and ensure "harvesting for the highest economic use"; and to "retain a scenic forest environment". Rainforests are to be conserved, harvesting being restricted to "mature trees for specialty use, at an intensity low enough to maintain canopy and rainforest structure and composition".

The Commission is also required to maintain regular records, such as harvesting plans and logging history maps, compartment history maps, fire plans, management plans, annual management and financial reports.

In all these respects, without exception, the Commission has failed to fulfill its obligations in its management of public forests in the Mount Royal area, as in most other management areas.

Prior to legal action by NEFA in 1990 to compel the Commission to comply with the law regarding preparation of an Environmental Impact Statement, the Commission had not surveyed the flora and fauna of Mount Royal State Forest, assessed habitat requirements, or displayed any regard for forest values other than timber resources. There are no forest preservation reserves in the M.A. There were no fauna or flora inventories apart from the Commission's classification of broad forest types; consequently knowledge of the forest environment being subjected to such massive impacts was scant. Operations proceeded without regard for known likely effects of overcutting on wildlife habitat, species composition and diversity, effects on soil (including compaction, erosion, loss of structure, nutrient levels and increased temperature); turbidity and sedimentation of streams. Prescriptions such as 20 metre filter strips (within which selective logging is permitted practice), erosion mitigation measures, retention of habitat trees and "50% canopy retention" were applied, if at all, without assessment of their effectiveness and despite criticism by experts. Often even these inadequate prescriptions were ignored and supervision of operations was minimal or non-existent. Areas of rainforest were destroyed by roading, logging and burning to be replaced by regeneration of commercially favoured species. The forest has been subjected to decades of grazing and frequent burning with no assessment of the effects of these practices.

Harvesting yields from the Mt Royal Management Area (MA) during the thirty-year period from 1950 to 1980 averaged 50,000 cubic metres per decade - 5000 annually. In January 1985 the quota mill closed down, and by 1988 annual yield had fallen virtually to nil.

Commission operations for the period 1982 to 1988 showed a loss, despite considerable subsidies from the public purse. Financial records for the period 1988 to 1992 have not yet been made available, but would show a significant loss, without including the value of subsidies.

Records and monitoring of operations in the M.A. have been woefully inadequate or non-existent over these decades. There was no Management Plan in existence over the period when most harvesting took place (the first draft was prepared in 1984, and the Plan was not finalised until 1988), supervision and monitoring were inadequate, records were lamentable. A perusal of annual management reports for the eighties reveals continuing deficiencies. Commenting on the lack of harvesting plans and controls, the report for 1985-86 states: "The Mount Royal Management Area is a difficult area to afford adequate supervision considering its distant location within the district."

The same Report states that: "Compartment histories have not been adequately maintained. Permanent Growth Plots have suffered as a result of staff transfers. No measuring or maintenance in established PGPs took place in 1983-4 or 1984-5. During 1985-6 no measuring or maintenance or establishment of PGPs occurred. Priority has been given to Cessnock M.A."

Reports for 1986-87 and 1987-88, 88-89, 89-90 repeat that compartment histories have not been maintained and no work done on Permanent Growth Plots. Despite very little activity in the M.A. the Report for 1988-89 says of growth information: "Lack of time and resources prevented any work being undertaken".

The Reports for the past three financial years (dated in August, August and January the following year respectively) state that "a financial report will be provided at a later date".

#### NO MORE LOGS

The Mt Royal Management Plan says that:

"In the 47 years to 1988 total production has been 200,000 cubic metres net including 190,000 of hardwood sawlogs, at an average rate of 4,266 cubic metres net per annum including 4,035 cubic metres hardwood sawlogs." In the 30 years from 1950 to 1980 total production was 150,000 cubic metres, and in the sixties annual production averaged 5,700 cubic metres. The result of this overcutting is that the only mature sawlogs available for harvesting in the M.A. until about year 2040 are in the 654 hectares (net productive area\*) of old growth currently in dispute, of which 532 ha are in the Davis Creek Section. This is all the old growth remaining in the M.A., and at the conclusion of the proposed cutting cycle in the old growth, about year 2002, there will be no mature sawlogs until 2040. It is obvious then that harvesting has been well above sustainable levels.

The position is even worse, however, since there is a shortfall in availability even of small sawlogs from thinning, as the Management Plan explains:

"There are no appreciable quantities of advanced regrowth trees now in the 40-100cm dbhob size ranges. Regeneration stands of sizes generally well below 40cm dbhob are present on some 940 ha logged and culled since 1963 and could not be expected to develop sufficiently to sustain a commercial thinning for small sawlogs for at least 10 years, i.e. until about year 2000. A further 1,400 ha has been completely logged and regeneration is well-developed, but at least 20 years away from development to a sufficient size to sustain commercial thinning for small sawlogs, assuming average tree increment to be less than 2cm dbhob per year, i.e. not available until about year 2010. A further 40 years is expected to be required for these stands to reach harvestable maturity for mature sawlogs, i.e. years 2040 (940 ha) and 2050 (1,400 ha)."

The Management Plan then looks at the longer term prospects and estimates that after this period of shortage to year 2040, the 4,400 ha available for long-term production should "give a sustained yield of quota sawlogs of something in the order of 2,000 to 2,500 cubic metres per annum." This is based, as with other estimates in the Plan, on yield figures obtained in Chichester Management Area.

Worth noting also is discussion in several Annual Management Reports for the Chichester M.A. of an option to use the remaining old growth in Mt Royal M.A. to alleviate the critical shortage of sawlogs in the overcut Chichester forests.

### CHICHESTER MANAGEMENT AREA In a 1982 Report on the Chichester Management Plan, Paul Scobie wrote:

"The Dungog region has been, and is being, heavily overcut with a serious decline in sawlog availability. The Timber Industry's own planning conference, Forward, estimated in 1974 that sawlog availability in the Dungog region would decline 75% (135,000m3) in the 25 years between 1975 and 2000. (Forward Panel Report 2, p.50)... It is clear from the Plan that a hiatus is expected in sawlog supply from the area and the Forestry Commission figures show sawlog availability will decline to almost nothing by 2023...

"The volume of timber available from Chichester forests was re-assessed in 1975/76 and it was determined that the sustained yield quota for sawlogs was 15,800m3 net per annum. (Plan, p.25). From 1975 to 1980 the Commission allowed

sawlog yields to increase 45%, in full knowledge that the quota was 36% above sustained yield levels, and ex-quota cut was 28% on top of this irresponsibly high quota. The Plan states (p.24):

The critical consideration, however, is that sufficient area of regrowth stands will NOT have reached maturity by the time the cutting cycle is completed about 2023/24. (My emphasis)...

The Chichester Management Plan states (p.41):

Harvesting of hardwood forest shall aim at the sale of ALL trees considered to be merchantable."

This very heavy logging of the 90% of the hardwood forests for sawlogs amounts to clearfelling when integrated sawlog/pulpwood logging takes place. The Plan states harvesting of pulpwood may include:

trees of any species, size or maturity encountered in timber harvesting operations already described in this plan, which are judged to have no present or potential value as sawlogs, poles or piles. (p.43). (Paul Scobie 1982.)

Scobie in 1982 saw that

"The clear intention of the NSW Forestry Commission is to develop an integrated sawlog/pulpwood operation in this area, as stated on page 20:

The virgin forest areas of the Chichester Management Area contain a significant component of overmature, highly defective stems which are totally unsuitable for sawmilling purposes. Following logging much of this material is currently wasted in silvicultural practices such as culling and clearing and consequently would be available profitably to help support a woodchip project without prejudicing sawmill industry committments.

These logging practices are so intensive that forest values other than wood production receive only token consideration." (Paul Scobie, 1982)

And indeed integrated logging was introduced in 1983/84, and the following year "saw full integration of sawlog and pulpwood operations being achieved" (Annual Report). Sales of pulpwood, chiefly to Sawmiller's Exports P/L, totalled over 800,000 tonnes during 1983/84 to 1987/88.

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The move to integrated sawlog/pulpwood harvesting in Chichester has brought an acceleration of the loss of oldgrowth forest and a significant increase in environmental impact.

Yield analysis of completed compartments shows that between 1976 and 1983 9,604 m3 was cut from 5 recut compartments and 49,065 m3 from 11 virgin compartments. In 1983/84 23,258 m3 of the year's total of 24,337 m3 of quota sawlogs were cut from 298 ha of virgin forests. More recent Management Reports do not give proportions of recut to virgin compartments logged.

### The Annual Report for 1982/83 stated that:

" Previous Management reports have expressed some concern with the 1980 Plan's requirement to maintan a suitable overall mix of virgin and previously logged areas. The 1975/76 assessment recognised a resource of 110,000m3 gross of previously logged areas generally available for relogging. The 1982 assessment estimated there was 25,000m3 of this resource available at the commencement of 1982/83."

In that year (1982/83) 52% of the of the area logged was virgin forest, yielding 16911m3 net from 217 ha as against 4460m3 net from 200 ha of previously logged forest.

Throughout the eighties the sawlog quota remained at about double the sustainable figure, so that by 1988 assessed yield indicated that "if the

balance is to last until 2039, quota would be 5,818m3 per annum from 1990, i.e. 27.1% of current quota" (Annual Report). As the District Forester said in his bitter Report for 1986/87, "the future holds no ray of hope". Nevertheless the quota remained unchanged for 1988/89. Instead of reducing quotas, various proposals including taking supplies from neighbouring Gloucester & Mount Royal Management Areas, even more intensive integrated logging, and greater concentration of logging in virgin areas, were considered.

Despite continued high volumes and increases of 44 - 48% in royalties in 1983/84, the Management Area lost \$717,909 for the four-year period 1982/83 to 1985/86, the only period for which this writer has figures - an average of about \$180,000 per annum. (This net loss figure does not include the asset write-off resulting from the Rainforest Decision).

The Chichester Management Plan was due for revision in 1985, extended to 1988, and the new Plan has still not been published.

### GLOUCESTER MANAGEMENT AREA.

A similar situation has existed in Gloucester M.A., which includes Barrington Tops and Stewarts Brook State Forests. Net average sawlog production between 1977 and 1984 was 28;884 cubic metres per annum, whereas the sustainable yield figure is 10,000 cubic metres. In addition to this there was a further average net ex-quota cut of 8,566 cubic metres per annum. Thus sawlog production from the M.A. has been many times the sustainable yield. The Management Plan (1984) states that "Sustainable yield could not be expected to be available until towards the end of next century (2070-2090). (p.41)

The Forestry Commission admits that harvesting at this level can only continue until 2005, but the current Gloucester Management Plan (1984) makes no definite plans to reduce production to a sustainable level, and yields were not significantly reduced until 1990/91, and remain well above the sustainable level.

The Commission has continued a policy of grossly unsustainable logging in this Management Area. In 1986/87 quota sawlog yield was 22,838 cubic metres net; in that year Allen Taylor & Company agreed to accept a quota cut-back from 19,380 cubic metres to 16,000 cubic metres, with further reductions planned. The Commission rejected this. In his Annual Report the District Forester commented: "This District is at a loss to why the offer was rejected by Head Office and why further opportunities (for reductions) have gone by the way." In 1987/88 total quota was 22,000 cubic metres, and the Annual Report for the year states that "In order to achieve a yield towards sustainable (10,000 cubic metres p.a. net) annual quotas will need to be reduced substantially, from 1989 onwards. This fact is accepted by local industry and it is expected the 1989 quotas will be ... 14,200 net... It can be seen that to eke out the remaining resource until 2020 (when regrowth will contribute about 50% of yield) an annual cut of about 11,300 cubic metres is required from 1989 onward."

Despite this, current figures from the Gloucester Office indicate that approximately 24,500 cubic metres of sawlogs and about 20,000 cubic metres of other logs were cut last year (1991-92); the Commission says this is about half the previous levels (District Office pers. comm.) - although the figures indicate otherwise.

Current Management Accounts for the Management Area have not been made available to date; the Accounts for 1986/87 and 1987/88 show losses of \$218,000 and \$172,000 respectively. The Report for 1988 says that a dramatic increase in Head Office overheads contributed significantly to the result.

### ENVIRONMENTAL IMPACT STATEMENTS ON EXHIBITION FOR PUBLIC COMMENT

Remnant old growth forests in Mt Royal, Gloucester and Chichester State Forests are all scheduled for logging in the near future. Roading and logging operations in many old growth areas of north-eastern N.S.W. were halted following legal actions by the North East Forest Alliance to compel the Commission to undertake Environmental Impact Statements (EIS) as required by law. The first of these EISs have now been published, for Wingham and Mt Royal Management Areas, with EISs for Dorrigo and Glen Innes due later this month and those for Gloucester and Chichester next year.

Surveys undertaken in Mt Royal and Wingham Management Areas for the Environmental Impact Statements just published reveal highly significant fauna and flora species and associations and confirm assessments undertaken by the North East Forest Alliance (NEFA) in 1989 which concluded the remnant old growth forests in these areas should be given high priority for conservation reserve status.

The EISs however argues that proposed logging operations will have minimal impact on the environments and should proceed.

This is an outrageous and dishonest conclusion. Our knowledge of forest ecology and species' habitat requirements is limited, but studies of the effects of logging operations, particularly the intensive integrated harvesting operations proposed for these old growth forests, confirm commonsense expectations of serious effects on flora and fauna and fundamental transformation of the forest environment by such operations.

These EISs ignore the results of such studies; moreover, they even decline to consider the relevance of studies undertaken by Forestry Commission Wildlife Reseach Officers which remained suppressed as unpublished internal Commission documents until obtained by NEFA in the course of the Chaelundi court hearings. These highly relevant studies are not mentioned in these EISs and do not appear at all in the listed references. In addition, the EISs and the Fauna Impact Statements distort the results of the Fauna and Flora Surveys upon which their assessments are supposed to be based, and deliberate deficiencies and blatantly misleading errors further invalidate the Surveys themselves.

NEFA urges all who are concerned about the threatened loss of the few areas of quality old growth remaining in NSW and the many vulnerable and rare species dependent upon them, to lodge objections to these disgraceful EISs. Closing date for responses to the Wingham EIS is October 26th and for Mt Royal, November 17th.

### GROUNDS FOR OBJECTION: THE MT ROYAL EIS

### FLORA

The Surveys reveal an astonishing variety within the small area of Old Growth in the Davis and Cross Creeks section of the State Forest. Within an area of 993 hectares, an altitudinal range from 600 to 1400 metres and differences in soil and aspect and other factors not well understood because of our inadequate knowledge of natural ecosystems, produce a range of communities from the rare dry old growth through untouched moist sclerophyll forests to pristine cool temperate, temperate, gallery and subtropical rainforests and pure stands of antarctic beech (at its southern and western limit.) High diversity of flora and fauna at Mt Royal is a direct and obvious consequence of the presence of these remnant unlogged areas. Logging simplifies floristic structure and consequently potentially fauna also, with risk of local loss of entire species and a decline in number of some species. Other factors associated with logging and forestry management are also known to have major impacts on many species of flora and fauna - for example, cattle grazing, post logging top disposal burning, frequent fuel reduction burns and broadscale burns, roads and snigging tracks.

The EIS fails to adequately assess these impacts on the unique flora of the area.

The survey found rare flora species and associations including old growth dry sclerophyll Eucalyptus canaliculata (a Grey Gum) with Eucalyptus eugenoides association with extremely limited occurrence, preferred habitat for the Yellow-bellied Glider. The Flora Survey notes a number of other forest associations regarded by Benson (1989) as inadequately conserved.

The proposed temporary reservation of an area of Eucalyptus canaliculata pending consideration of its conservation status is quite inadequate. No doubt the Commission intends to find a stand in unloggable country elsewhere to declare as Flora Reserve, and proceed to log the high quality Mt Royal area.

### FAUNA

\* The EIS claims various "safeguard measures" will protect fauna from the impacts of logging. In fact these measures are little more than the Forestry Commission's standard prescriptions providing for filter strips and erosion mitigation measures and excluding very steep country from logging. These measures have been criticised by experts including the Commission's own Research Officers as quite inadequate, and have been found so in Court judgements.

\* The so-called "fauna reserves" are not really reserves and may be logged.

\* The Yellow-bellied Glider "reserve" of about 40 ha is laughable considering a home range of about 30 - 60 ha per family group (up to 4 or 5 individuals).

\* The Koala "reserve" falls mostly within steep country excluded from logging for that reason by routine prescription . No Koalas were found within this proposed reserve, nor in the adjacent plot 12M.

\* The so-called "wildlife corridors" are simply the old "filter strips" within which logging (but not machinery movement) is permitted; and major road crossings create large gaps in these "corridors".

\* The moist gully filter strips are inadequate refuges for many species and may be inadequate to maintain populations of others.

\* The "corridors" are predominately rainforest habitat unsuitable for most arboreal mammals. There are no corridors for non-rainforest species.

\* It is significant that the claim in the EIS that "the fact that (Hastings River Mouse) is found in logged areas suggests that forestry practices may not place it at risk. Its preferred habitat, near creek banks, will not be disturbed by logging machinery" is dishonest nonsense. Only one individual was found (Read found 5 at Mt Royal in 1985). The largest known community of 20 individuals in Forestland State Forest was wiped out by Forestry ativities. Although little is known about this species, which has been found in differing habitats, present knowledge suggest it is not correct to say its preferred habitat is near creek banks: Read's Report suggests its preferred habitat is near soaks, seepage areas and perched swamps away from streams.

\* The fauna survey included as logged a plot which is essentially unlogged

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having been very lightly and illegally logged abut 40 years ago, such that it is old growth in character. Furthermore, this plot is the only moist plot among those classed as "logged" which is completely surrounded by unlogged forest habitat - the 900 hectares of the Davis Creek Section adjoining the National Park. Over three times the number of arboreal marsupials were found on this plot than on other logged moist sites. Other plots were also misclassified.

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\* The relevant comparison is that between plots within substantially undisturbed (old growth) forest and plots within regrowth forest. The combined effect of these plot misclassifications is to very significantly understate the effect of logging on fauna populations, especially Gliders. This invalidates the EIS conclusions regarding impacts, and reveals the bias and dishonesty of the document.

\* Even without correcting for these errors, the Fauna Survey found that 80% of the Yellow-bellied Gliders recorded in the study plots were in unlogged forest; and that all the Koalas, 60% of the Greater Gliders and 80% of the Brushtail Possums were in unlogged forest, which according to the EIS data is only 13% of the Management Area. Moreover, the logged plots in the Survey were harvested more than 20 years ago, and although heavily logged were not subjected to the integrated sawlog/pulplog operations proposed for these old growth areas. Consequently it is likely that these previously logged areas would support somewhat higher populations of arboreal mammals than areas to be intensively logged in future integrated logging operations, especially since there are old growth areas nearby. With the loss of this old growth habitat populations of a number of species could be expected to decline.

\* No fauna plots were located anywhere in the region of upper Cross Creek, containing a 17 ha stand of Antarctic Beech and an area of secondary cool temperate rainforest with massive Messmate overstorey. This area is very steep the soil type unstable. The Fauna Survey did not sample this area because it was too steep to gain access; yet the proposed road goes right up there, crosses the creek a second time and returns back along the other side. There is no sampling of this environment, or assessment of impacts there, which will clearly be massive.

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The Mt Royal Management area is small, and the unlogged Davis Creek Section is only 993 hectares. Yellow-bellied Gliders have a home range of 30-60 hectares per family group of up to 5 individuals, pairs of Sooty Owls require about 500 ha, pairs of Powerful Owls about 1000 ha. These and other species require unlogged, old growth forest, but have different habitat requirements - some prefer rainforest and moist gullies, some dry old eucalytpt forest etc. It is nonsense for the EIS to suggest that 'narrow filter strips and a couple of small bogus "reserves" will preserve populations and species of rare fauna in this area.

### SOIL EROSION

The new road in the unlogged Davis Creek Section traverses steep slopes through two higly erodable soil types: tertiary basalt-derived dark red-brown Krasnozems and skeletal loams with yellow Solodic soils on midslopes and red Soloths on mid to lower slopes. The EIS notes that the Soil Conservation Service classifies the Krasnozems as "having high to very high erosion hazard"; and classifies the skeletal loams' erosion hazard as "high on upper slopes and very high on midslopes." The new road has caused very severe slumping on midslope sections, as the EIS admits, and even more severe damage could be expected from the proposed continuation of the road beyond Cross Creek.

The claim in the EIS that the Standard Erosion Mitigation Conditions will

provide an adequate safeguard in such extremely and demonstrably susceptible locations is pathetic, and illustrates the disregard shown in the EIS to important considerations of catchment values and water quality.

### TOURISM

The insensitivity to likely impacts on flora and fauna is evident also in the EIS recommendation that tourist cabins be located on the edge of the Yellow-bellied Glider "reserve" and adjacent to the stand of Antarctic Beech and the cool temperate rainforest. The EIS states that: "There would appear to be an existing demand for accommodation in the forest, particularly given the high bookings at the Barrington Tops Guest House.."

### IMPACTS NOT ASSESSED

The Flora Survey states that: "Although both logged and un-logged stands were sampled, it was very difficult to assess logging impact...It is thus difficult to relate impact of past logging to that of planned logging."

Similarly The Fauna Impact statement admits that it is a limitation of the survey that the logged and unlogged lots were in different catchments, and adds:

"This means that the effects of logging (on the distribution and abundance of fauna) coud not be separated from the effects of natural differences between the Davis Creek and Carrow Brook/Fal Brook catchments, such as soil type."

In other words, this EIS has not assessed the likely impacts of the proposed logging operations! It has merely repeated ad nauseum, that these impacts will not be significant, on totally inadequate grounds, as its own data shows.

Moreover, the EIS repeatedly misrepresents the proposed operations '(integrated sawlog/pulplog harvesting) as "selective logging" and "logging at no greater intensity than previously"; the EIS does not assess the likely impacts of intensive integrated operations, and can therefore be again challenged as not assessing the impacts of the proposed operations.

### WINGHAM EIS

The Wingham EIS is dishonest in the same manner. Of the proposed "Conservation Reserves" in the Wingham Management Area, 75.2% of the area of these is inaccessible because of steep slopes and therefore presumably of "low site quality". Moreover, only 6.2% (400 ha) is Flora Reserve (already existing), the remaining 93.8% being PMP 1.3 (Preserved Native Forest) and therefore not really conservation reserves at all. The EIS says these will be "assessed over time to determine which areas should be gazetted as Flora Reserves". There is no commitment to permanent reserves in addition to the existing Flora Reserves of only 400 ha; PMP 1.3 classification can be altered by the Commission at any time and the area logged - it does not provide legal protection.

Similarly the Wingham Fauna Impact Statement (FIS) implies the proposed operations are "selective logging". This is not true - the Wingham Plan of Management and the EIS itself are explicit that the operations will be intensive integrated sawlog/pulpwood operations.

The Wingham F.I.S. also says that "it is clear that there is increasing evidence of protected (and endangered) fauna being able to survive within a selectively logged forest."

With such low numbers, the concern is the survival of species in the

area. For example, only one Yellow-bellied Glider was seen in a total of 105 km of road transects, and 5 were heard calling in gullies. It would therefore seem reasonable to conclude that this species may be at risk in the area, rather than to conclude that one sighting is evidence of its survival. Most importantly, this conclusion begs the question of the impacts resulting from integrated logging operations as opposed to 'selective logging'.

Most of the studies carried out for the Wingham EIS were in areas not logged recently and therefore not logged 'intensively' - only 4 out of 45 plots were in areas described as "high intensity logging -1977 to 1987". However, this category disappears in discussions of relative population abundance and species richness and comparisons of logged and unlogged forest. Consequently, once again the Survey is misleading and the conclusions invalid.

Send objections to:

\* The Director, National Parks and Wildlife Service, demanding that the Servic, refuse to issue Fauna Licences to the Forestry Commission for operations in old growth forests in Mt Royal and Wingham Management Areas.

\* The Director, Department of Planning, 175 Liverpool St Sydney 2000.

List your objections to the EISs in a letter including your personal reasons for valuing old growth forests and calling for remaining old growth areas to be incorporated into conservation reserves.

\* Write also to Bob Carr, demanding that the Opposition join the Independent in unqualified opposition to the Government's Natural Resources Package of legislation, due to be introduced next month.

You could also write to newspaper letters editors and contact radio stations and politicians. Any donations towards legal and campaign costs would be most appreciated.

For further information write sending 5 postage stamps (for photocopying) to: North East Forest Alliance, Hunter Region P.O. Box 9 Singleton 2330 phone (065) 77.3105



### THE WAY FORWARD

17-0

RESOLVING FOREST CONFLICT IN NORTHERN NEW SOUTH WALES.

Draft Strategy

### **1.2 THE STRATEGY**

The intention is to use the best information realistically attainable to design conservation and timber reserve system for north-eastern NSW. It is envisioned that three forest tenures will be identified: conservation reserves, multiple-use forest and timber reserves. The intention is to have this done in an open scientific process with allowance for public scrutiny and consideration of all the options and full awareness of any trade offs. The outcome would be to delineate the requirements for an adequate conservation reserve system and provide the timber industry with resource security.

The primary aims of this strategy are to:

i) remedy major deficiencies in knowledge necessary to design an adequate reserve system;

ii) use scientific criteria to design a reserve system capable of sustaining all the forests present natural and cultural values into our uncertain future;

iii) identify regrowth forests and plantations required to provide adequate timber volumes to industry in the long term, with intensive management;

iv) allow local input into deciding the most appropriate regional timber industry and seek Government assistance to facilitate industry restructuring;

v) use transparent open processes with allowance for public participation at both the national and local levels;

vi) develop a reactive system that can be refined as more information becomes available or circumstances change.

It is recognised that because of the abysmal ignorance of forest wildlife, ecosystem functioning, management impacts and forest productivity that a reasonable approximation of an adequate reserve system can only be identified with the urgency required, if both the State and Federal Governments provide significant resources. Even then it must be recognised that research and monitoring will have to be ongoing and the reserves regularly reviewed.

To minimise irreversible consequences of decisions made in ignorance it is essential to adopt the precautionary principle and be conservative when making decisions that threaten regional bioiversity. For convenience the boundaries adopted for North-eastern NSW are those adopted by the National Forest Inguiry (Fig. 1). This larger area needs to be seperated into bio-regions based on environmental attributes and economic regions based on catchment boundaries. The boundaries of these regions may differ widely.

### WHAT ARE THESE PROPOSED RESERVES?

Using the best information obtainable and computer analysis it is proposed that public forests be allocated to three tenures:

(i) Conservation Reserves - forest areas given legislative protection for the adequate conservation of the full range of forest values which are significantly affected by forestry activities;

(ii) Timber Reserves - forest areas given legislative protection for the supply of timber to industry under an intensive management regime and in a sustainable manner. Timber Reserves are to be delineated in conjunction with a plantation establishment program. To be identified within the constraints imposed by an adequate conservation reserve system and proper multiple use constraints;

(iii) Multiple-use forest - forested areas not required for Conservation Reserves and decided as part of the assessment process to be best managed for multiple uses. Areas to be mapped according to significant economic, environmental and aethetic potential and managed accordingly. Low intensity timber production is expected to be an acceptible use in appropriate areas under constraints imposed by other values or uses.

### WHAT ABOUT PRIVATE LANDS?

forest lands, process should include all assessment The as regardless of tenure. Landholders with forests identified being appropriate or desirable for a given zoning should be consulted and appropriate strategies for maintaining the values of the forest identified. Landholders with land identified as for plantation development or environmental also be consulted and those wishing to being suitable plantings should participate in plantings delineated.

### 1.3 THE PROCESS

Establish a Reserve Steering Committe to be comprised of representatives of Australian National Parks and Wildlife Service, National Parks and Wildlife Service, Department of Primary Industries and Energy, Forestry Commission of NSW, North East Forest Alliance and Forest Protection Society to oversee the design of a reserve system.

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The Steering Committee oversees the appointment of an advisory panel comprised of experts of the highest professional standing, representing each major forest interest, including soil conservation, water catchment management, wood production, recreation uses, ecosystem and environmental research, heritage protection, conservation reserve management and social impact assessment.

Under the direction of the steering committee and advisory panel the National Parks and Wildlife Service are to be directed to prepare an adequate conservation reserve design based on environmental criteria. Concurrently the Forestry Commission are to be directed to prepare an adequate timber reserve design based on timber production criteria (within identified environmental constraints).

1.3.1 (a) Conservation Reserve design

The identification of an adequate reserve system will require;

i) identify gaps in avaiable information and initiate research to obtain data required;

ii) enter all required information into a computerised Geographic Information System (Appendix 2),

iii) publish report and maps showing data layers - forest types, land tenure, wilderness, old growth forest types, naturalness, water resources, cultural resources, actual and predicted distribution of target species, areas required to maintain minimum viable populations of indicator species, etc.

iv) undertake further surveys to validate predictions, design options for a reserve system based on ecological criteria

v) publish report and maps of reserve options for public consideration.

1.3.1 (b) Multiple-use and Timber Reserve design

i) identify gaps in avaiable information and initiate research to obtain data required;

ii) enter all required information into a computerised Geographic Information System (Appendix 2),

ili) publish report and maps showing data layers - water resources, recreational potential, forest productivity, logging history, available yields of forest types, long-term yields of forest types, land suitable for plantation establishment; unloggable areas

iv) asses public submissions along with environmental and cultural values in the designation of multiple use forests and production reserves required to meet long term options
v) publish report and maps showing production options and seek expressions of interest from landholders for establishing commercial plantations

### 1.3.1 (c) Impact mitigation guidelines

The advisory panel has the responsibility of determining management goals and prescriptions for each tenure and threatening process, by:

i) compiling existing information on environmental impacts of forest uses, identifying areas for further research, prepare management prescriptions and initiate monitoring sites

ii) exhibiting a report and inviting public submissions before adopting management prescriptions to be applied to mitigate impacts of all forest uses upon environmental attributes.

iii) compiling existing information on regional economies, with detailed information on forests contribution, identifying communities most dependent on logging, modeling projected future of the timber industry under various scenarios, identifying market oportunities for timber industry, identifying social impacts and mitigation measures,

1.3.2. Integrate reserve and production designs

The Steering Committee and advisory panel then integrate the reserve designs:

i) integrate models and produce report and maps showing options for forest use, this should delineate three forest categories - reserve, multiple-use and production.

ii) consider public submissions in finalising forest allocation and publishing final report

iii) publish prospectus of available resources and seek tenders from industry,

iv) make tenders publically available and invite public submissions, giving particular weight to regional concerns, before deciding allocation of resource

v) identify role for Government in facilitating industry restructuring and developing employment - financing milling and drying equipment, assisting plantation establishment, silvicultural treatment of regrowth, providing infrastructure, assisting research and development etc.

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### NORTHERN FORESTRY ACCORD DRAFT PROPOSAL



### RATIONALE

The present conflict over forest use in the North Eastern region of N.S.W. requires a solution to be worked out and agreed to by the stakeholders in the region. There is a need for an agreed long term forestry industry strategy that arrests the decline and encourages investment. This has to be achieved within the ecological perspective of identification of an appropriate forest reserve system.

The Northern Forestry Accord is a process involving the establishment of a project team to facilitate industry community and government liaison and participation to develop an understanding by way of an accord in the forestry sector on North Eastern region of N.S.W.

The objective of the project team is to research all relevant matters in relation to the three key issues involved in the sector: Markets, Technology and Resource and to arrive at an accord between all parties which will promote sustainable development and which will focus on employment generation, landcare and other conservation considerations. While resource and reserve assessment are outside the initial scope of this project, they are recognised as issues that complement this project.

### MARKET

The project will undertake investigation and assessment of existing and projected domestic and international market opportunities. This will include the market potential for speciality purpose hardwoods and value added hardwood products as well as low unit value, high volume material currently used in pulp and paper production. A particular emphasis will be given to researching markets, the production for which is complementary with existing industry infrastructure and the nature of the resource. Achieving production on a sustainable basis will also be a fundamental consideration.

### TECHNOLOGY

The project will undertake a study which will give full consideration to finding an appropriate strategy for the manufacture of products to satisfy new markets, profitably and competitively and within the most environmentally sensitive manner. This is to include emerging technologies and small scale technologies as they apply to the production of composite timbers, pulp and paper as well as milling and drying technologies for small timber.



### RESOURCE

The project will place a significant emphasis on the viability of plantations. This will identify future requirements and opportunities for a plantation industry including availability of land and suitability of species as well as the availability of technology. A particular emphasis in regard to plantations and resource based work will be job creation. Also included in the work being undertaken on the resource will be enhanced forest productivity in relation to regrowth forests and plantations, as well as investment considerations for private sector share farming. The project will require access to government (NFI, NSWFC, NPWS) computer data bases and modelling and analysis along with the generation of the required data. The project will also address alternative fibre resources and recyling.

### OUTCOMES

The group will prepare a report in draft form to be circulated for public comment which will identify options for a sustainable timber industry. The final report will consider the feasibility requirements and social, environmental and economic impacts of each identified option and allow for detailed assessments and feasibility studies of the preferred options to be initiated.

### FUNDING

The participants are currently seeking costings from consultants likely to be involved in the process.

### PARTICIPATION

The present working group includes representatives of the forest products industry, the investment sector, local community groups and the regional environment movement. It is anticipated that the team will consist of a core group of four full time members with part time members being seconded as required and consultants being employed where necessary. It is anticipated the project will take approximately 1 year.

M. Frohlich Sept-92

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Clr Linda Gill 21 Possum Pie Rd WOOTTON 2423

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Ph;977 263 Fx; as above

To MF Bob Martin M.P Hon Shadow Minister for Lands & Forests, Agriculture & Rural Affairs 161 Maitland Rd MAYFIELD 2304

### Dear Bob,

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On behalf of the delegation of members from the North East Forest Alliance (N.E.F.A), North Coast Environment Council (N.C.E.C) and the Great Lakes Environment Association Inc (G.L.E.A), I would like to thank you for our recent meeting.

We felt it a valuable exercise and believe that dialogue such as this is essential to resolve the present state of conflict over and in our state forests.

We are anxious for clarification of some matters raised at our meeting as soon as possible.

- Would you have the Forestry Commission substantiate their claims of 5 million hectares of OGF, in light of the Resource Assessment Commission (R.A.C) Forest and Timber Inquiry Final Report, 1992 findings of 1.5 million hectares.

Dr.H.Recher of the Dept. of Eco-system Management U.N.E Armidale, studied the R.A.C figures and estimates only 1.14 million hectares of the 1.5 million hectares are Eucalypt old growth and that these areas are highly fragmented

- What option will the Labor Party take in regard to the immediate cessation of OGF logging as recommended by the final R.A.C report. As you pointed out private lands are as important as crown lands. Dr H Recher estimates that as little as 3% of what was here 200 years ago, has protection of any kind.
- Could you please send us details of the process and criteria the State Labour Party will adopt to assess OGF.
- Will the Labor party give a commitment to a complete review and assessment of private property clearing for woodchip, the present assessment process is totally inadequate.

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### NEWS\_RELEASE - Thursday 9 Sept. 92

### Logging violence condemned WE HAVE A <u>RIGHT</u> TO \_\_\_\_\_\_TEST

The violence and assault on police and peaceful protesters carried out yesterday by timber industry supporters in the Wild Cattle Creek State Forest has been condemned as "truly extremist behaviour" by the united voices of north coast environment (20)

In a joint statement issued today over 40 groups cailed

\* restraint from timber industry supporters who yesterday threatened and attacked environment fats and to set

- \* the NSW government to:
  - abandon its proposed Natural Resource Package,
  - stop the logging of old growth forests immediately and undertake a comprehensive assessment of old growth forests as recommended by the Resource Assessment Commission.

"Australia is de must be prote de non-violently,

demogracy in which the right to peaceful protest demogracy in which the right to express their views peakesperson for NVCA, Cr Lyn Orrego, said.

"Conservation to are not aimed at the timber industry workers," a lesp of Vor NCEC, Mr Jim Tedder, said.

"We are conce ad about employment in the industry and have sympathy for workers but it doesn't justify assaulting people protesting cefully. We condemn the violence.

"Our prote are aimed at the mismanagement of the Forestry Commission cutting out the remaining old growth forests at an accelerating rate. There's no long term future for timber workers under present Forestry Commission management," he said.

"We are alarmed about the loss of  $\bigcirc$ .d growth forests. There is only 1.14 million hectares of eucalypt old growth left in NSW, less that the was here 200 years ago," a CHEC representative, Mr Trevor Pike, said.

"All groups support the Resource Assessment Commission's Final Report recommendation for a comprehensive assessment of old growth forest to create adequate consevation reserves and that logging only be contemplated AFTER this has been done and where no alternative supplies of timber exist.

"As only 2/3 of the remain lig old growth is protected in reserves we believe an assessment would snow lig have already lost too much.

"Compartment 546 of Wild Cattle Creek State Forest, with its thousand year old brushbox trees, rainforest and abundant wildlife is a rare gem of old growth forest adjoining a major tourist drive. It has much more potential economically and environmentally as living history than it does as a one-off cut for timber and woodchips," he said.

For more information phone: North Coast Environment Council: Mr Jim Tedder (065) 690802 Nambucca Valley Con Ass: Cr Lyn Orrego(065) 647478 or (065) 647808 Coffs Harbour Environment Centre: Mr Trevor Pike (066) 551869 Bellingen Environment Centre: Martin Hogan (066) 552595 Clarence Environment Centre: Melinda Pleisman (066) 431863 Wild Cattle Creek Action Group: Kalina (066) 575180 North East Forest Alliance: Aidan Ricketts (066) 213278

NORTH COAST ENVIRONMENT COUNCIL NAMBUCCA VALLEY CONSERVATION ASSUM COFFS HARBOUR ENVIRONMENT CENTRE BELLIGEN ENVIRONMENT CENTRE CLARENCE ENVIRONMENT CENTRE WILD CATTLE CREEK ACTION GROUP NORTH EAST FOREST ALLIANCE 

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GREEN ALLIANCE NETWORK FAL BROOK WILDLIFE REFUGE TZC

*P.O. Box 9 Singleton 2330 Australia* phone: (065) 77.3105 fax/data: (065) 77.3001 E-mail: peg: ganref

TO: NEFA AREA CO-ORDINATORS

DRAFT BACKGROUND MATERIAL FOR IMPENDING MOUNT ROYAL EIS.

(NOTE: draft. Material obtained through Freedom of Information Act is incomplete (Management Accounts have been withheld), some of it confusing. Nevertheless the general account given here is well-founded. Further information and comment will be available when the EIS is published - expected this month. More information on Chichester & Gloucester M.A.s including field investigations will be available soon. Meanwhile, comments/corrections welcome.)

UPPER HUNTER OLD GROWTH THREATENED:

THE DAVIS CREEK SECTION OF MOUNT ROYAL STATE FOREST

Mount Royal Management Area comprises 6,694 hectares of the Mount Royal Forest, the remaining 753 hectares of which is within Chichester M.A. The area occupies the south-western slopes of the extremities of Barrington Tops, east of Muswellbrook and about 50km north of Singleton.

Proposed logging operations in Mount Royal State Forest threaten all old growth forest remaining in the Management Area. Most of these ancient forests are in the Davis Creek Section, adjoining the south-western boundary of Barrington Tops National Park, and physically separate from the rest of the State Forest. A Court injunction obtained by the North-East Forest Alliance (NEFA) in January 1990 halted roading operations pending the preparation of an Environmental Impact Statement, as required by law. This EIS is now about to be published, and unless prevented by legal or other action, the operations which will destroy these forests will proceed this year.

Almost all of this Section is previously unlogged old growth forest, which is very diverse, ranging from open dry sclerophyll forest with casuarina understorey, moist dense tall hardwood forest, to Messmate-dominated secondary rainforest and cool temperate rainforest and pure stands of Antarctic Beech. The area has been submitted for inclusion in the Barrington Tops National Park because of its unique conservation values. Much of the area is steep, with unstable soils and high rainfall. No flora or fauna surveys had been conducted prior to the commencement of forestry roading operations; however, it was known that the area contains rare, endangered and vulnerable species.

The Davis Creek Section was included in the Proposed Additions to Barrington Tops National Park, Submission by Conservation Groups, in December 1982, because of its high conservation value. The Submission states:

"The area contains a diversity of plant communities including some not represented or poorly represented in the (then existing) Park. Continuous pure stands of rainforest, cool temperate to sub-tropical are found throughout the area including the Big Losy/Mount Cockrow-Davis Creek/Falbrook area.... The cool temperate Antarctic Beech forests within this section are more diverse than the higher altitude Beech forests within the Park. Those at the low altitude of 900m (such as those within the Davis Creek Section - ed) are of particular scientific interest and are not well represented within the park." (page 17)

The groups involved in this Submission were the National Parks

Association of N.S.W., the Nature Conservation Council of N.S.W., the National Trust of Australia (N.S.W.), the Colong Foundation for Wilderness and the Newcastle Flora and Fauna Protection Society.

Sixty per cent of the Davis Creek Section as a whole is over 20 degrees slope, and a significant percentage is over 30 degrees slope, the figures by compartments being: compartments 200, 50 per cent over 30 degrees, 201, 12 per cent, and for compartments 202, 203 and 204 approximately 20 per cent is over 30 degrees slope.

The Davis Creek/Cross Creek area is small, and the impact of these operations will be correspondingly massive, and lead to the destruction of the conservation values for which the area is so valuable. The Section contains endangered, rare and vulnerable species.

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### FAUNA

The avifauna of the Mt Royal area is rich and diverse. A total of 90 species of birds have been recorded from the Mount Royal State Forest. These include four species of owl, four species of pigeon, four species of cockatoo including the Glossy Black Cockatoo, eight species of honeyeaters, the Peregrine Falcon, Rose Robin and Ground Thrush. Species at the extremity of their distribution include the Noisy Pitta, Regent Bowerbird (soutern limit) and the Pilot Bird (northern limit). Most of the rainforest gullies in the area support pairs of Powerful Owls, according to the E.I.S. Survey.

Species richness of large arboreal marsupials is high, with Greater Gliders the most abundant (total count 133). Other species detected are Ringtail Possum, Yellw-bellied and Sugar Gliders (total count 58) Brushtail Possum, Mountain Brushtail Possum, and Koala (6 occurrences). Small arboreal mammals include Brush-tailed Phascogale, Brown Antechinus, Sugar Glider, Bush Rat and Fawn-footed Melomys. Macropods include Red-necked Pademelon and Rednecked Wallaby (both extremely abundant), Parma Wallaby, Eastern Grey Kangaroo, Common Wallaroo, Swamp Wallaby, Long-Nosed Potoroo and Rufous Bettong. Other species include Echidna, Spotted-tailed Quoll, Northern Brown Bandicoot, Long-Nosed Bandicoot, Common Wombat, Dusky Antechinus, Common Dunnart, Swamp Rat and Hastings River Mouse; seven species of frogs, twenty species of reptiles including Diamond Python. There are also reports of sightings of the Eastern Quoll, but this species has not been confirmed in formal surveys.

The Report of the Fauna Survey, part of the E.I.S., has just been obtained. The general conclusion that fauna would not be significantly affected by logging operations is contradicted by the evidence presented, as shown by the attached graph of data in Section 4.3 of the Report. See P.10.

"Of particular concern is the scarcity of old-growth dry sclerophyll forests. The Davis Creek Section of Mount Royal State Forest (compartments 200-204) appears to be one of the most significant old-growth dry sclerophyll forests remaining in northern NSW... I have no doubt that the Davis Creek Section is of immense environmental significance for its old-growth eucalypt forests, untouched cool-temperate rainforests, Messmate dominated secondary rainforests, swamps and soaks, diverse fauna and for numerous other reasons. " - Dailan Pugh, NEFA

### DEGRADATION OF THE FOREST ENVIRONMENT

The Mount Royal State Forest has been subjected to gross mismanagement by the Forestry Commission in past decades. The Commission's own regulations and guidelines require that harvesting yield from forests shall be "adjusted to

the sustainable capacity of the forest" and operations shall minimise damage to the forest environment; that filter strips along watercourses and sensitive exclusion areas shall be observed and erosion mitgation measures implemented; that the forest resource be studied and inventoried for its values and characteristics and operations conducted in such manner as to "retain the range of forest types and their ecological viability" and to "maintain a diverse habitat for viable populations of indigenous wildlife", and to "maintain any significant or rare ecological, floral, faunal or other scientific values"; to "retain trees of value for wildlife habitat" and establish reserves to conserve representative samples of flora and plots to monitor growth rates; to adopt measures to "minimise the loss of forest values resulting from wildfire" and "conserve catchment values", and to monitor harvesting operations and market forest products to "maximise financial return to the State" and ensure "harvesting for the highest economic use"; and to "retain a scenic forest environment". Rainforests are to be conserved, harvesting being restricted to "mature trees for specialty use, at an intensity low enough to maintain canopy and rainforest structure and composition". (Quotes are from the Mount Royal Management Plan 1988). The Commission is also required to maintain regular records, such as harvesting plans and logging history maps, compartment history maps, fire plans, management plans, annual management and financial reports.

In all these respects the Commission has failed to fulfill its obligations in its management of public forests in the Mount Royal area, as in most other management areas.

Prior to legal action by NEFA in 1990 to compel the Commission to comply with the law regarding preparation of an Environmental Impact Statement, the Commission had not surveyed the flora and fauna of Mount Royal State Forest, assessed habitat requirements, or displayed any regard for forest values other than timber resources. There are no forest preservation reserves in the M.A. There were no fauna or flora inventories apart from the Commission's classification of broad forest types; consequently knowledge of the forest environment being subjected to such massive impacts was scant. Operations proceeded without regard for known likely effects of overcutting on wildlife habitat, species composition and diversity, soil compaction, erosion, turbidity and sedimentation of streams, soil structure, nutrient levels and temperature. Prescriptions such as 20 metre filter strips (within which selective logging is permitted), erosion mitigation measures, retention of habitat trees and "50% canopy retention" were applied, if at all, without assessment of their effectiveness and despite criticism by experts. Often even these inadequate prescriptions were ignored and supervision of operations was minimal or non-existent. Areas of rainforest were destroyed by roading, logging and burning to be replaced by regeneration of commercially favoured species. The forest has been subjected to decades of grazing and frequent burning with no assessment of the effects of these practices.

All these abuses are a matter of public record and the subject of trenchant criticism in court judgements, parliamentary inquiries, expert studies and the media, as features of Forestry Commission practice throughout the State. Such practice makes nonsense of dishonest guidelines and objectives in management plans which profess commitment to sustainable capacity, ecological viability, species diversity, erosion mitigation, and so on.

### OVERCUTTING, WASTE, INEFFICIENCY

Harvesting yields from the Management Area (MA) during the thirty-year period from 1950 to 1980 averaged 50,000 cubic metres per decade - 5000 annually. In January 1985 the quota mill closed down, and by 1988 annual yield had fallen to 4 cubic metres (of fencing)! As a result of this massive rate of overcutting over three decades, Commission operations for the period 1982 to 1988 showed a loss, despite considerable subsidies from the public purse. Financial records for the period 1988 to 1992 have not yet been made available, but would show a significant loss, without including the value of subsidies.

Records and monitoring of operations in the M.A. have been woefully inadequate or non-existent over these decades. There was no Management Plan in existence over the period when most harvesting took place (the first draft was prepared in 1984, and the Plan was not finalised until 1988), supervision and monitoring were inadequate, records were lamentable. A perusal of annual management reports for the eighties reveals continuing deficiencies. Commenting on the lack of harvesting plans and controls, the report for 1985-86 states: "The Mount Royal Management Area is a difficult area to afford adequate supervision considering its distant location within the district. When new parcel sales begin a formalised system of working will include harvesting plans being split into 'sectors', with contractors requiring the supervising foreman's approval before shifting into a new sector. Foremen now fill out a standard checklist every time they visit a bush operation". Progress indeed!

The same Report states that: "Compartment histories have not been adequately maintained. Permanent Growth Plots have suffered as a result of staff transfers. No measuring or maintenance in established PGPs took place in 1983-4 or 1984-5. During 1985-6 no measuring or maintenance or establishment of PGPs occurred. Priority has been given to Cessnock M.A." Reports for 1986-87 and 1987-88, 88-89, 89-90 repeat that compartment histories have not been maintained and no work done on Permanent Growth Plots. Despite very little activity in the M.A. the Report for 1988-89 says of growth information: "Lack of time and resources prevented any work being undertaken".

The Reports for the past three financial years (dated in August, August and January the following year respectively) state that "a financial report will be provided at a later date".

It is evident from comments in the annual Management Reports that finalising estimates and allocations of the Davis Creek resource was a major cause of the inordinate delay in finalising the Management Plan after some 6 years or more of prevarication. For example, the Report for 1986-87 says: "Management Plan preparation: The first draft was submitted in December 1984. Since that time there has been much deliberation over the uncommitted resource. At present further work on this preparation has been postponed until resource allocation has been decided." It would also seem that lack of adequate harvesting supervision for the remaining uncommitted quota quality timber meant that operations were suspended. The only sales in the M.A. for 1986-87 were parcel sales to a licencee of 316 cubic metres over a three-week period. The Annual Report commented: "Although further sales could have been negotiated, the proportion of quota quality timber and the low level of supervision that could be afforded meant that operations could not continue."

In other words, there were no quota allocations in the Management Area after the quota mill, Maitland Timber and Hardware, informed the Commission in May 1984 that they required no more logs. Evidently the Commission was unable to sell the tender until 1989 when two licencees took quotas for the old growth. Between May 1984 and December 1989 only parcel sales were made. Parcel sales are sales of timber at a flat rate per cubic metre gross regardless of species or size. This method is especially uneconomic for class one quality sawlogs harvested without adequate supervision.

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NO MORE LOGS

The Management Plan says that:

"In the 47 years to 1988 total production has been 200,000 cubic metres net including 190,000 of hardwood sawlogs, at an average rate of 4,266 cubic metres net per annum including 4,035 cubic metres hardwood sawlogs." In the 30 years from 1950 to 1980 total production was 150,000 cubic metres, and in the sixties annual production averaged 5,700 cubic metres. The result of this overcutting is that the only mature sawlogs available for harvesting in the M.A. until about year 2040 are in the 654 hectares (net productive area\*) of old growth currently in dispute, of which 532 ha are in the Davis Creek Section. This is all the old growth remaining in the M.A., and at the conclusion of the proposed cutting cycle in the old growth, about year 2002, there will be no mature sawlogs until 2040. It is obvious then that harvesting has been well above sustainable levels.

The position is even worse, however, since there is a shortfall in availability even of small sawlogs from thinning, as the Management Plan explains:

"There are no appreciable quantities of advanced regrowth trees now in the 40-100cm dbhob size ranges. Regeneration stands of sizes generally well below 40cm dbhob are present on some 940 ha logged and culled since 1963 and could not be expected to develop sufficiently to sustain a commercial thinning for small sawlogs for at least 10 years, i.e. until about year 2000. A further 1,400 ha has been completely logged and regeneration is well-developed, but at least 20 years away from development to a sufficient size to sustain commercial thinning for small sawlogs, assuming average tree increment to be less than 2cm dbhob per year, i.e. not available until about year 2010. A further 40 years is expected to be required for these stands to reach harvestable maturity for mature sawlogs, i.e. years 2040 (940 ha) and 2050 (1,400 ha)."

The Management Plan then looks at the longer term prospects and estimates that after this period of shortage to year 2040, the 4,400 ha available for long-term production should "give a sustained yield of quota sawlogs of something in the order of 2,000 to 2,500 cubic metres per annum." This is based, as with other estimates in the Plan, on yield figures obtained in Chichester Management Area - in this case, 0.5 cubic metres net quota sawlog volume per productive hectare per year.

### CHICHESTER MANAGEMENT AREA

Yield estimates, harvesting plans and silvicultural practices used in the Mt Royal M.A. are based on integrated sawlog/pulpwood logging operations carried out in the neighbouring Chichester area, where overcutting over past decades has been most severe.

In a 1982 Report on the Chichester Management Plan, Paul Scobie wrote: "The Dungog region has been, and is being, heavily overcut with a serious decline in sawlog availability. The Timber Industry's own planning conference, Forward, estimated in 1974 that sawlog availability in the Dungog region would decline 75% (135,000m3) in the 25 years between 1975 and 2000. (Forward Panel Report 2, p.50)... It is clear from the Plan that a hiatus is expected in sawlog supply from the area and the Forestry Commission figures show sawlog availability will decline to almost nothing by 2023...

"The volume of timber available from Chichester forests was re-assessed in 1975/76 and it was determined that the sustained yield quota for sawlogs was 15,500m3 net per annum. (Plan, p.25). From 1975 to 1980 the Commission allowed sawlog yields to increase 45%; in full knowledge that the quota was 36% above

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sustained yield levels, and ex-quota cut was 28% on top of this irresponsibly high quota. The Plan states (p.24):

The critical consideration, however, is that sufficient area of regrowth stands will NOT have reached maturity by the time the cutting cycle is completed about 2023/24. (My emphasis)...

The Chichester Management Plan states (p.41):

Harvesting of hardwood forest shall aim at the sale of ALL trees considered to be merchantable."

This very heavy logging of the 90% of the hardwood forests for sawlogs amounts to clearfelling when integrated sawlog/pulpwood logging takes place. The Plan states harvesting of pulpwood may include:

trees of any species, size or maturity encountered in timber harvesting operations already described in this plan, which are judged to have no present or potential value as sawlogs, poles or piles. (p.43).

The clear intention of the NSW Forestry Commission is to develop an integrated sawlog/pulpwood operation in this area, as stated on page 20:

The virgin forest areas of the Chichester Management Area contain a significant component of overmature, highly defective stems which are totally unsuitable for sawmilling purposes. Following logging much of this material is currently wasted in silvicultural practices such as culling and clearing and consequently would be available profitably to help support a woodchip project without prejudicing sawmill industry committments..

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These logging practices are so intensive that forest values other than wood production receive only token consideration." (Paul Scobie, 1982)

These practices have continued to the present in all Hunter Region Management Areas.

### GLOUCESTER MANAGEMENT AREA.

A similar situation has existed in Gloucester M.A., which includes Barrington Tops and Stewarts Brook State Forests. Net average sawlog production between 1977 and 1984 was 28,884 cubic metres per annum, whereas the sustainable yield figure is 10,000 cubic metres. In addition to this there was a further average net ex-quota cut of 8,566 cubic metres per annum. Thus sawlog production from the M.A. has been many times the sustainable yield. The Management Plan (1984) states that "Sustainable yield could not be expected to be available until towards the end of next century (2070-2090). (p.41)

The Forestry Commission admits that harvesting at this level can only continue until 2005, but the current Gloucester Management Plan (1984) makes no definite plans to reduce production to a sustainable level, and yields were not significantly reduced until 1990/91, and remain well above the sustainable level.

The Commission has continued a policy of grossly unsustainable logging in this Management Area. In 1986/87 quota sawlog yield was 22,838 cubic metres net; in that year Allen Taylor & Company agreed to accept a quota cut-back from 19,380 cubic metres to 16,000 cubic metres, with further reductions planned. The Commission rejected this. In his Annual Report the District Forester commented: "This District is at a loss to why the offer was rejected by Head Office and why further opportunities (for reductions) have gone by the way." In 1987/88 total quota was 22,000 cubic metres, and the Annual Report for the year states that "In order to achieve a yield towards sustainable (10,000 cubic metres p.a. net) annual quotas will need to be reduced substantially from 1989 onwards. This fact is accepted by local industry and it is expected the 1989 quotas will be ... 14,200 net... It can be seen that to eke out the remaining resource until 2020 (when regrowth will contribute about 50% of yield) an annual cut of about 11,300 cubic metres is required from 1989 onward."

Despite this, current figures from the Gloucester Office indicate that approximately 24,500 cubic metres of sawlogs and about 20,000 cubic metres of other logs were cut last year (1991-92); the Commission says this is about half the previous levels.

Current Management Accounts for the Management Area have not been made available to date; the Accounts for 1986/87 and 1987/88 show losses of \$218,000 and \$172,000 respectively. The Report for 1988 says that a dramatic increase in Head Office overheads contributed significantly to the result.

### VIRTUAL CLEARFELLING

The Chichester Management Plan, published in 1980 and due to be revised in 1985, has still not been replaced. The 1988 Mt Royal Plan is more moderate in language, but the basic harvesting policy and silvicultural practice is the same.

The Mt Royal Plan states, with regard to the projected sustained yield of 2000 - 2500 per year from year 2040:

"To achieve such a level of yield, adequate regeneration to ensure a final stocking of at least 125 stems/ha of commercial tree species would be required on the 2050 hectares yet to be harvested or relogged in the current cutting cycle. The intensity of this harvesting should be sufficient to achieve the required level of regeneration without further silvicultural treatment." "The harvesting and silvicultural treatments involved in the utilisation of the remaining old growth resource will establish the stand conditions necessary for optimum forest growth over most of the remainder of the productive area."

Licence agreements with two timber companies for the old growth resource, obtained by NEFA at the time of the injunction hearing, provide for 2250 m/3 gross class 1 logs each for the first year of the cycle (at \$40.20 per cubic metre), and there is no specified limit on the quantity of class 2 logs (at \$8.60). The total of 4,500m3 (class one logs only) per year is about double the volume given elsewhere in the Plan as a sustainable figure (see above).

### UNDECLARED WAR ON RAINFOREST

"Sydney Blue Gum, Tallowood and Silvertop Stringybark forests (types 46,47 and 168) all have associated rainforest flora. The Chichester Plan describes these moist forests as having 'a high rainforest element', or as 'a wet sclerophyll forest with an understorey verging on rainforest'. These types make up 58% of the total (Chichester) forest, and in logging these areas the Management Plan states that 90% will be logged. The remaining 10% includes 'inaccessable areas, filter strips, preserved areas etc'. Therefore, very little of the poorly conserved moist hardwood with its associated rainforest will remain unlogged." (Paul Scobie, 1982).

Much of the remaining rainforest in the Hunter region consists of ribbons and pockets associated with streams, and is very vulnerable to damage and disturbance from roading and harvesting of hardwoods growing near their edge. Subsequent management, especially the use of fire, exacerbates the damage. There are numerous examples of damage and dieback of rainforest in these forests.

The once-widespread misconception that rainforest logging no longer occurs in NSW persists in the minds of some people. Even the Mt Royal Plan, drafted to take account of the sensitivity of the issue, states that: "Harvesting within rainforest stands will be restricted to:

- the salvage of dead or dying trees, or of trees damaged or likely to be damaged by forest operations.

- very selective harvesting of mature trees for specialty use, at an intensity low enough to maintain canopy and rainforest structure and composition."

Although the policy is not to otherwise log what little rainforest remains in Mt Royal State Forest, the reality of Commission practice is management directed towards the destruction of rainforest. In the case of Chichester, the war on rainforest is an openly declared war. The Chichester Plan states:

"During the late 1950's and early 1960's there was a period when fire was almost completely excluded from sections of the Management Area. The reduced fire occurrence in these sections was obviously a major factor in promoting development of mesic understorey and generally inhibiting the development of regeneration of eucalypts and related hardwoods....

Occurence of even a light fire, repeated at long intervals of years may be sufficient to kill most rainforest elements and subject to the presence of canopy openings of sufficient size, would favour regeneration of moist eucalypts and associated wet sclerophyll species... Broad area hazard reduction burning and pre-logging and post-logging burning not only provide fuel-reduced buffer zones as a fire protection measure, but heavily favour the wet sclerophyll types and grass cover against the INVASION by rainforest elements." (My emphasis)

Here the war on this intrusive invader is explicit. However, management practice in Mt Royal has also been clearly directed towards replacing rainforest elements with commercial hardwood species. Canopies are opened by roading and, and regular burning completes the decimation of rainforest elements. Of even greater significance for remaining rainforest elements in the old growth areas in Mt Royal forests, is the fact that the Commission's definition of "rainforest" excludes secondary rainforest containing eucalypts. Consequently the majestic ancient Messmates towering over beautiful cool temperate rainforest near the head of Cross Creek, below Mt Cockrow in the Davis Creek Section, adjacent to stands of Antarctic Beech, are to be roaded and logged under the proposed harvesting plan. Many other significant remnant rainforest areas are similarly threatened, such as Whispering Gully and the Upper Paterson River. These areas are included in the proposed Barrington Wilderness.

In the light of all this, the licence agreements and harvesting plans for the proposed operations in the remaining Mt Royal old growth are alarming. It is evident that the intensity of the operations in terms of removals of some 40-45,000 cubic metres of mature class one sawlogs and maximum removal of class 2 logs from the Davis Creek Section together with maximum ground disturbance and both top disposal and broadscale burning, will amount to trashing the Section in an integrated sawlog/pulplog operation for maximum yield and regeneration towards 125 stems per ha in one cutting cycle without further "silvicultural treatment". There is no pretence of a change to sustainable harvesting.

### TAXPAYERS PAY FOR OLD GROWTH LOGGING

An Environmental Review prepared in 1983 for proposed operations in Davis Creek Section estimates a net gain of \$89,000 to the Commission. Amendments in 1988 estimate the gain at \$128,000. A number of factors suggest that the operations, if allowed to proceed, may result in a significant loss:

\* the above estimates do not include legal costs to date and for any forthcoming action brought by NEFA;

\* costs of the E.I.S. are not included;

. .

\* there is substantial evidence that Commission estimates of available timber and yields are based on inadequate data and are highly unreliable;

\* even if legal action and political pressure fail to prevent the operations, it is most unlikely that operations based on yield estimates derived from the gross overcutting - virtual clearfelling - operations in the Chichester Management Area would be permitted to proceed without drastic reductions in yield volumes;

\* the proposed operations are clearly in breach of the Management Plan; a revision of operations in accordance with Plan provisions would make the operations even less viable economically than they are already;

\* it is very likely the final roading costs will be higher than the \$160,000 original estimate (later revised to \$210,000).

\* it may be that the Commission has incurred other costs as a result of entering into a contract with licencees for operations found to be illegal in the Land and Environment Court.

\* given the above, an estimated net gain of around \$12-15,000 per annum doesn't leave much margin for error.

The Commission routinely overcut native forests in operations showing a net financial loss. Currently whilst the Commission talks about "ecological sustainability" and a "sustainable yield strategy", forests are still being cut at grossly unsustainable levels, and at a loss. The policy seems to be to keep quotas high and cut the old growth as fast as possible, and then reduce quotas towards more sustainable levels from the regrowth. In the Walcha-Nundle Management Area, for example, sawlog quotas were set at 52,000 cubic metres per annum, which was expected to exhaust the forests of millable wood by 1991, after which it would not be until year 2030 or 2040 that viable annual yields would again be available. A sustainable yield was considered to be 12,300 cubic metres per annum, possibly rising to 25,000 cubic metres over time. All Commission estimates are based on logging all remaining old growth, including those now subject to a morotorium pending an EIS a well as those currently being trashed while EISs are carried out. Last year (1990/91) the Walcha -Nundle Management Area lost \$11,500 on its eucalypt operations and \$228,100 on its pine plantations.

These figures, of course, are the Commission's figures which ignore the substantial subsidies which, after what is absorbed in waste and inefficiency, the Commission passes on to the industry. The NSW Parliamentary Accounts Committee reported that the industry benefits from public subsidies amounting to \$16 million annually. The total figure is likely to be much higher. In addition, construction of roads and bridges for timber harvesting costs the taxpayer \$12 million annually.

However, it would seem that even on the Commission's estimates and ignoring subsidies, if Davis Creek is logged it would be at significant cost to the taxpayer; and the real financial cost would be even greater.

But the greatest, and irreplaceable cost would be the loss of the last remaining old growth in the Mount Royal State Forest.

- Barrie Griffiths, August 5th 1992

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Fauna Survey 20 Year Impact of Logging

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In early 1991 the NSW Forest Commission conducted a Fauna Survey in the Mt Royal State Forest. The consultants conclude that there it no difference in habitat value between logged and unlogged forest. In the graph above each left-hand column represents the number of small native animals found in the study in unlogged forest. The right-hand column is the population of the same animal that they found in forest that had been logged 20 or more years ago.

Data from Forest Commission of N.S.W. "Mt. Royal Management Area Fauna Survey - June 1991" s4.3

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P.S. Members of NCEC + NEFA may be nerested 12-6-92 Tze in the conference on Sustainable Forestry at UNE in Feb 93 (brochure enclosed) Dear Jim, Apologies for not being in touch sooner. When we last spoke, I was planning to attend the NEFA meeting in Armidale & to discuss the enclosed proposal with John Corkill. Due to their very tight agenda v other commitments of mine, we managed only a short conversation. I left John with a copy of the proposal \* my phone no. if he had any comments. As I have not heard from him, I hope I can assume the proposal is OK with him. I would be glad of comments it you have any!! To date I have done a couple of small trial analyses but there are no conclusive answers yet. I will be away on a Pilliga field trip + back the following week. Unless I hear from you, I will continue with the analyses proposed here. 2.64 Regards, LizDate (067)732404(067)732769wk Dept of Ecosystem Management Fax Univ. of New England Armodale NSW 2351 Hm 667) 751071 (or my home address which you have !)

Has the dedication of National Parks adversely affected employment in the timber industry in northeastern New South Wales?

### Introduction

The Forestry Commission of New South Wales has suggested that employment in the timber industry in NSW has been reduced by the locking up of timber resources in National Parks (Gibbs 1992). We (NCEC and UNE) wish to test whether there is any basis for this statement. We will examine changes in employment in the timber and other industries in areas where National Parks have been declared and compare them with changes in areas where National Parks have not been declared.

### Methods

Statistics on employment in the timber and other industries are available from the Australian Bureau of Statistics by local government area (LGA) for the 1981 and 1986 censuses. They can be extracted using a computer program, 'Supermap'. Two types of analysis will be carried out:

A general comparison of employment in logging, 1. sawmilling, production of other timber products, support services (i.e., retail, public service), agriculture and tourism between those LGAs in which National Parks have been declared between 1981 and 1986 and all other LGAs. Paired comparisons of individual LGAs with and without National Park declarations between 1981 and 1986. The LGAs will be paired according to income from and production in the timber and other industries. The comparisons will be used to detect whether employment and production in the timber industry have changed in comparison with other Suitable LGAs for this comparison in industries. northeastern NSW are: Washpool, Dorrigo Border Ranges, Werrikimbi (Wauchope) and Nymboida areas (with NPs) vs. Walcha, Urbenville and Nambucca areas (without NPs).

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# NVIRONMENT COUNCIL INC.

### FORESTRY STATEMENT BY THE NORTH COAST ENVIRONMENT COUNCIL

PRIOR TO THE PREPARATION OF THE E.I.S. FOR

THE WAUCHOPE AND KEMPSEY MANAGEMENT AREAS

June 1992

### Introduction

This Council represents forty conservation organisations between the Hunter and the Tweed and west to the New England Highway. It has fifteen years of dealing with matters of resource conservation and acting as one of the voices of the community.

### <u>Old Growth</u>

This Council opposes the cutting of the remaining areas of old growth forest. It does so on the following grounds, -it is a scarce resource - possibly less then 5% of the State Forests.

- -It is often on very steep and inaccessible areas and therefore poses problems of erosion control and economics of logging,
- it is considered to be refugee areas for rare and endangered fauna and possibly flora,
- it is important to maintaining water quality and flow in streams,
- it is a scientific reference area,
- logging these areas will not solve the long term future of the local saw milling industry.

### Regrowth Forests

This Council is not opposed, in the forseeable future, to logging in regrowth forests. Provided,

- royalties are adjusted to reflect the true value of the product on the market,
- that royalties are not reduced to compensate for long haulage distances outside the management areas,
- that there should be a rethink on integrated logging until longer time research indicates what are the results,
- that mills are encouraged by financial incentives to re equip with modern technology to handle smaller logs,

- that re generation programs encourage the growth of mixed hardwoods to take advantage of specialised markets and ensure the health of the forest,
- that industry and the Commission move into plantations of mixed hardwood without delay,
- that more attention be given to management by better erosion control measures, wider filter strips and wildlife corridors.

### <u>Plantations</u>

This Council believes the only way to resource security for an assured timber industry on the North Coast is for industry to start providing their own resource by plantation. This can be achieved by,

- lease arrangements with local land holders to plant trees,
- encouraging local land holders to plant wood lots.

### Wood Chipping

This Council is opposed to export wood chipping. It believes that the use of sawmill waste and plantation thinnings for wood chips are acceptable and necessary but should be directed towards small scale locally based pulp mills.

Woodchipping contd.

The Council considers the present policy of forest management is pointing to wood chip production as a priority and it bases this belief on

- the integrated logging process which encourages thick regrowth of generally one species of timber,
- the encouragement of blackbutt to the exclusion of other species.

### Small Savmills

This Council encourages the continued existence of locally owned locally based sawmills producing a range of products for local use as well as sale outside the area. It wishes to see the end processing of local timbers within the district to the degree that is economically viable.

The Council opposes the system of log quotas to company mills, often based outside the management area.

The present management is exploitive of the forests as reduced quotas over the years have indicated. The push to log the final old growth areas to extend the industry for a few more years indicates a desperation.

The increasing penetration of the timber market by the softwood industry from plantations in NSW, Victoria and New Zealand and the threat of huge overseas hardwood plantations to woodchip exports spells disaster for the North Coast timber industry unless practices change.

### THE COLONG FOUNDATION FOR WILDERNESS LTD.

### Tuesday March 17th, 1992

### HELP SAVE THE OLD GROWTH FORESTS

The Forest Industry is attempting to pre-empt the determination of important wilderness and national park proposals. Over the next few months areas of high conservation value will be logged without prior environmental assessment and review.

The Colong Foundation for Wilderness requests your assistance in reversing the trend in the current forest debate. The enclosed maps and background information are provided to assist your group and to enable it to inform us of local developments.

Please send media releases and letters from your society to your local newspaper and radio stations. Reply to the attacks in the media on old growth forests. Support the Wilderness (Dedication of New Areas) Bill which seeks to expand wilderness protection in N.S.W. Summary maps and descriptions of this proposal can be obtained from the Foundation. The Wilderness (Declaration of New Areas) Bill proposes to add 400,000 hectares of wilderness to the national park estate.

Representation should be made to your local parliamentarians and letters sent to key members of Parliament expressing alarm at the holiday from environmental impact assessment given to the Forestry Commission so that it can permit logging of national park and wilderness proposals with impunity. Explain that logging the remaining old growth forests will not save our timber industry because it is unsustainable at current cutting rates. Only plantations can secure forest industry jobs in the medium and long term.

Should you require any further information on this matter, please contact me on (02) 247 4714 or 241 2523 (work).

Yours sincerely,

K. Mun

Keith Muir Project Officer

### BACKGROUND BRIEFING ON THE TIMBER INDUSTRY'S ATTACK ON OLD GROWTH FORESTS

The resource security/wilderness protection debate has to date been largely focussed on regional and local employment issues to the detriment of the more broadly based public interest in nature conservation.

According to Premier Greiner's policies, employment loss is acceptable when it saves money (eg the 27,000 reduction in N.S.W. public sector employment) but not when it saves the environment. Logging the remaining old growth, however, can only save a few jobs for a few years until the timber is cut out, then timber supply and employment will collapse.

Dnly 5% (or about 200,000 ha) of the forest estate remains in a wilderness condition and most of that area is difficult to log. It contains a high proportion of remaining old growth forest and is of prime importance for the preservation of endangered species. The claim that 1,200 jobs will be lost if wilderness is protected must be based on the fact that the Forestry Commission is unable to find alternative timber resources in the 3.3 million hectares of forest, outside wilderness. If this is so then it proves that there has been gross over cutting taking place in our forests.

The Resource Assessment Commission has found that prolonged over cutting was the main cause of the dwindling supply of hardwood longs in N.S.W.

The industry has substituted short term profit for long term sustainability and forest workers should immediately be employed in the establishment of sustained yield forestry. Expenditure on forest plantations would promote sustained yield and ensure the preservation of the old growth forests.

### IMPACT OF THE TIMBER INDUSTRY BILL (ACT) ON N.S.W. WILDERNESS AREAS

Five Nominated wilderness areas are affected by the legislation:

Major parts of New England, Washpool, Barrington, Werrikimbe and Mann wilderness areas are affected by the legislation. Four of the five wilderness areas contain rainforest, elsewhere protected in national parks and inscribed on the World Heritage List. About 487 hectares of the Torrington State Forest in the Binghi wilderness is also affected.

By this new law, logging of key areas will pre-empt wilderness and national park proposals unless a strong campaign is mounted to stop this strategy.

The legislation allows for logging and roading of high value areas of forests outside the national parks in state forest, vacant and reserved crown land, leasehold and freehold land without prior environmental impact assessment and review. In about 1.7 million hectares of state forest and 0.3 million hectares of private land, the powers set out in Part V of the <u>Environmental Planning and</u> <u>Assessment Act</u> are void for up to two and half years. No prior

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preparation of environmental impact statements, their public exhibition, review of public submissions and the proposal prior to its determination will be required. In accord with its long established practice of accelerated logging of proposed national parks, it is probable that wilderness areas will be logged before the 1.5 million hectares of forestry land not proposed as wilderness.

During the time when environmental assessment is suspended, the provisions of the Endangered Fauna Act allowing for 40 day stop work orders to protect endangered fauna habitat also will not operate.

The Forestry Commission is required by the legislation to prepare environmental impact statements according to a set timetable for forest management areas specified in schedule 4. This schedule sets out the forests where logging operations may be carried out pending environmental assessment and review.

Wilderness assessment for all areas listed in Schedule 2 of the timber industry legislation will occur in parallel with determination of the environmental impact statements prepared for forest management areas\*. This provides a timetable for wilderness assessment. The Government will determine the Guy Fawkes, Mann and Washpool wilderness areas by October 31st of this year. New England and Werrikimbe by May 31st 1993, the Macleay Gorges by April 30th, 1994, Barrington and Deua by September 30th, 1994. For Deua and Macleay Gorges the decision represents a reprieve from the logging which would almost certainly occur if the wilderness nomination was rejected this year.

### Impacts of the legislation on the five wilderness areas most affected

#### NEW ENGLAND

About 19,000 hectares of the Dakes, Nulla-Five Day, Styx, Lower Creek and Pee Dee State Forests and 1,000 hectares of vacant crown land on Jobs Mountain can be logged without prior assessment. This represents about 31% of the nominated wilderness area. Adjoining areas of private freehold and leasehold lands can also be logged with impunity.

### Importance of wilderness management:

The existing national park is part of the N.S.W. rainforest world heritage parks. The wilderness contains 113 bird species, including 24 of the 36 rainforest dependent bird species found in N.S.W.

#### WASHPOOL

About 6,738 hectares of Billilimbra and Washpool State Forests can be logged without environmental assessment, overruling a previous Court judgement. These forests were the subject of an injunction issued in 1990 by the Land and Environment Court restraining logging activities until an environmental impact statement had been prepared. The area of forest represents 18% of the wilderness area.

\*Schedule 2 of the Timber Industry (Interim Protection) legislation lists New England, Washpool, Barrington, Werrikimbe, Mann Deua, Guy Fawkes and Oxley (Macleay Gorges). The schedule provides that parts of Mann, Washpool, New England, Werrikimbe and Barrington and all of Macleay Gorges, Deua and Guy Fawkes wilderness will not be logged before the environmental assessments are prepared.

### Importance of wilderness management:

The existing national park is part of the N.S.W. rainforest world heritage properties. The nomination represents the largest area of unmodified old growth forest in the northern half of the state.

### BARRINGTON:

About 8,000 hectares of the wilderness is in state forest which can now be logged without prior environmental impact assessment. There is an important area of vacant crown land of 650 hectares which separates the northern section of the national park from the southern section. Logging this area will cut the wilderness in two and can occur without environmental assessment. Logging activities can occur in five discrete forest areas and represents about 13.5 % of the nominated wilderness area.

### Importance of wilderness management:

Wilderness contains 15 threatened mammals. Habitat for 215 species of bird & 53 mammals. One of the largest areas of primitive rainforest in N.S.W. The national park is part of the N.S.W. world heritage rainforest area.

#### WERRIKIMBE

About 6,600 hectares of Carrai State Forest within the Werrikimbe wilderness can be logged without an environmental impact statement. this represents 10.5% of the nominated wilderness area.

### Importance of wilderness management:

The area protects the headwaters of the Macleay, Hastings and Forbes rivers. The national park is part of the N.S.W. rainforest world heritage property. The National Parks and Wildlife Service has recorded 46 species of reptiles and amphibians, 52 species of mammal and over 130 species of birds.

### MANN

The proposed Mosquito Road is a major logging haul road which will bisect the Dalmorton State Forest to the south of Nymboida National Park. The obvious intent of the road is to fragment the wilderness by isolating about 6,000 hectares of wilderness in the Mosquito Creek catchment representing 14% of the Mann wilderness.

### Importance of wilderness management:

Plant communities range from rainforest to eucalypt mallees. The Nymboida River is considered one of the best canoe touring rivers in N.S.W. The wilderness contains tiger cat, Parma wallaby, rufous rat kangaroo which are rare and endangered.

### Key Points for Media Releases and Lobbying of Politicians:

The Timber Industry (Interim Protection) Act will enable the forest industry to log wilderness and national park proposals of long standing without environmental impact assessment and review.

The legislation is an attempt to pre-empt the Government's decisions on five important wilderness nominations. Four of the five wilderness areas contain rainforest which is only partly protected in national parks which are inscribed on the World Heritage List. The total area of wilderness which can be logged without prior environmental assessment totals approximately 48,000 hectares.

The New England wilderness nomination is badly affected by the timber industry bill with over 30% of the wilderness nomination available for logging without prior environmental assessment. In Washpool, the largest area of old growth forest in the northern half of the state, 18% of the wilderness nomination can be logged without prior assessment. The decision to log the northern end of Washpool overrules the Land and Environment Court's decision to make the Forestry Commission undertake environmental assessment for the area before it is logged.

The old growth forest areas within wilderness areas are some of the last refuges of many endangered species. Yet the Timber Industry legislation permits logging of these key endangered species habitats.

According to Premier Greiner's policies, employment loss is acceptable when it saves money (eg reduction of 27,000 jobs in the public sector) but not when it saves the environment.

Only about 5% of the forest estate is in a wilderness condition, or about 200,000 hectares. Most of this area is difficult to log. There is **3.8** million hectares of forest outside wilderness areas. If these forests have no suitable timber resources, then these forests must have been grossly over cut. The timber industry has substituted short term profit for long term sustainability and forest workers should immediately be employed in establishing forest plantations.

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### THE COLONG FOUNDATION FOR WILDERNESS LTD.

### Tuesday March 17th, 1992

### HELP SAVE THE OLD GROWTH FORESTS

The Forest Industry is attempting to pre-empt the determination of important wilderness and national park proposals. Over the next few months areas of high conservation value will be logged without prior environmental assessment and review.

The Colong Foundation for Wilderness requests your assistance in reversing the trend in the current forest debate. The enclosed maps and background information are provided to assist your group and to enable it to inform us of local developments.

Please send media releases and letters from your society to your local newspaper and radio stations. Reply to the attacks in the media on old growth forests: Support the Wilderness (Dedication of New Areas) Bill which seeks to expand wilderness protection in N.S.W. Summary maps and descriptions of this proposal can be obtained from the Foundation. The Wilderness (Declaration of New Areas) Bill proposes to add 400,000 hectares of wilderness to the national park estate.

Representation should be made to your local parliamentarians and letters sent to key members of Parliament expressing alarm at the holiday from environmental impact assessment given to the Forestry Commission so that it can permit logging of national park and wilderness proposals with impunity. Explain that logging the remaining old growth forests will not save our timber industry because it is unsustainable at current cutting rates. Only plantations can secure forest industry jobs in the medium and long term.

Should you require any further information on this matter, please contact me on (02) 247 4714 or 241 2523 (work).

Yours sincerely,

Keith Muir Project Officer

### BACKGROUND BRIEFING ON THE TIMBER INDUSTRY'S ATTACK ON OLD GROWTH FORESTS

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The resource security/wilderness protection debate has to date been largely focussed on regional and local employment issues to the detriment of the more broadly based public interest in nature conservation.

According to Premier Greiner's policies, employment loss is acceptable when it saves money (eg the 27,000 reduction in N.S.W. public sector employment) but not when it saves the environment. Logging the remaining old growth, however, can only save a few jobs for a few years until the timber is cut out, then timber supply and employment will collapse.

Only 5% (or about 200,000 ha) of the forest estate remains in a wilderness condition and most of that area is difficult to log. It contains a high proportion of remaining old growth forest and is of prime importance for the preservation of endangered species. The claim that 1,200 jobs will be lost if wilderness is protected must be based on the fact that the Forestry Commission is unable to find alternative timber resources in the 3.6 million hectares of forest outside wilderness. If this is so then it proves that there has been gross over cutting taking place in our forests.

The Resource Assessment Commission has found that prolonged over cutting was the main cause of the dwindling supply of hardwood longs in N.S.W.

The industry has substituted short term profit for long term sustainability and forest workers should immediately be employed in the establishment of sustained yield forestry. Expenditure on forest plantations would promote sustained yield and ensure the preservation of the old growth forests.

IMPACT OF THE TIMBER INDUSTRY BILL (ACT) ON N.S.W. WILDERNESS AREAS

### Four Nominated wilderness areas are affected by the legislation:

Major parts of New England, Barrington, Werrikimbe and Mann wilderness areas are affected by the legislation. Three of the four wilderness areas contain rainforest, elsewhere protected in national parks and inscribed on the World Heritage List. About 487 hectares of the Torrington State Forest in the Binghi wilderness is also affected.

By this new law, logging of key areas will pre-empt wilderness and national park proposals unless a strong campaign is mounted to stop this strategy.

The legislation allows for logging and roading of high value areas of forests outside the national parks in state forest, vacant and reserved crown land, leasehold and freehold land without prior environmental impact assessment and review. In about 1.7 million hectares of state forest and 0.3 million hectares of private land, the powers set out in Part V of the <u>Environmental Planning and</u> <u>Assessment Act</u> are void for up to two and half years. No prior preparation of environmental impact statements, their public exhibition, review of public submissions and the proposal prior to its determination will be required. In accord, with its long established practice of accelerated logging of proposed national parks, it is probable that wilderness areas will be logged before the 1.5 million hectares of forestry land not proposed as wilderness.

During the time when environmental assessment is suspended, the provisions of the Endangered Fauna Act allowing for 40 day stop work orders to protect endangered fauna habitat also will not operate.

The Forestry Commission is required by the legislation to prepare environmental impact statements according to a set timetable for forest management areas specified in schedule 4. This schedule sets out the forests where logging operations may be carried out pending environmental assessment and review.

Wilderness assessment for Guy Fawkes, Mann, Washpool, New England, Werrikimbe, Barrington, Macleay Gorges and Deua will occur in parallel with determination of the environmental impact statements prepared for forest management areas. This provides a timetable for wilderness assessment. The Government will determine the Guy Fawkes, Mann and Washpool wilderness areas by October 31st of this year. New England and Werrikimbe by May 31st 1993, the Macleay Gorges by April 30th, 1994, Barrington and Deua by September 30th, 1994.

Certain areas of the wilderness areas prescribed above will not be logged prior to the determination of the environmental impact statement. Part of the Deua wilderness, however, is affected by the environmental impact statement completed in 1983 for 48,928 hectares within the Wandella State Forest No 1008 and Dampier State Forest No 926. This area is being logged now, despite the environmental assessment being old and inadequate. The logging would appear to be contrary to the commitment by the Government to a moratorium until the wilderness assessment report was determined by Cabinet.

### <u>Impacts of the legislation on the five wilderness areas most affected</u>

#### NEW ENGLAND

About 19,000 hectares of the Oakes, Nulla-Five Day, Styx, Lower Creek and Pee Dee State Forests and 1,000 hectares of vacant crown land on Jobs Mountain can be logged without prior assessment. This represents about 31% of the nominated wilderness area. Adjoining areas of private freehold and leasehold lands can also be logged with impunity.

### Importance of wilderness management:

The existing national park is part of the N.S.W. rainforest world heritage parks. The wilderness contains 113 bird species, including 24 of the 36 rainforest dependent bird species found in N.S.W.

### BARRINGTON:

About 8,000 hectares of the wilderness is in state forest which can

\* Schedule 2 of the Timber Industry (Interim Protection) legislation lists New England, Washpool, Barrington, Werrikimbe, Mann Deua, Guy Fawkes and Oxley (Macleay Gorges). The schedule provides that parts of Mann, Washpool, New England, Werrikimbe and Barrington and all of Macleay Gorges, Deua and Guy Fawkes wilderness will not be logged before the environmental assessments are prepared.

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now be logged without prior environmental impact assessment. There is an important area of vacant crown land of 650 bectares which separates the northern section of the national park from the southern section. Logging this area will cut the wilderness in two and can occur without environmental assessment. Logging activities can occur in five discrete forest areas and represents about 13.5 % of the nominated wilderness area.

### Importance of wilderness management:

Wilderness contains 15 threatened mammals. Habitat for 215 species of bird & 53 mammals. One of the largest areas of primitive rainforest in N.S.W. The national park is part of the N.S.W. world heritage rainforest area.

### WERRIKIMBE

About 6,600 hectares of Carrai State Forest within the Werrikimbe wilderness can be logged without an environmental impact statement. this represents 10.5% of the nominated wilderness area.

### Importance of wilderness management:

The area protects the headwaters of the Macleay, Hastings and Forbes rivers. The national park is part of the N.S.W. rainforest world heritage property. The National Parks and Wildlife Service has recorded 46 species of reptiles and amphibians, 52 species of mammal and over 130 species of birds.

#### MANN

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The proposed Mosquito Road is a major logging haul road which will bisect the Dalmorton State Forest to the south of Nymboida National Park. The obvious intent of the road is to fragment the wilderness by isolating about 6,000 hectares of wilderness in the Mosquito Creek catchment representing 14% of the Mann wilderness.

### Importance of wilderness management:

Plant communities range from rainforest to eucalypt mallees. The Nymboida River is considered one of the best cance touring rivers in N.S.W. The wilderness contains tiger cat, Parma wallaby, rufous rat kangaroo which are rare and endangered.

### DEUA

Logging of Deua wilderness is occurring in the Dampier State Forest near the National Park boundary in the very headwaters of the Deua River. Logging of Georges and Diamond Creek catchments are scheduled in the current plan of management. Approximately 10,000 hectares are at risk of being logged.

### Importance of wilderness management:

The rare Long-mosed Potoroo, Eastern Native Cat, White-footed Dunnart, Peregrine Falcon and the Australian Grayling are found in the area along with 20 rare and endangered plants. The wilderness core is drained by the Deua River. The Deua headwaters contains a series of waterfalls varying in height from 10 metres to 50 metres in rainforest lined gullies. This beautiful area will be ruined if logging continues.

### Key Points for Media Releases and Lobbying of Politicians:

The Timber Industry (Interim Protection) Act will enable the forest industry to log wilderness and national park proposals of long standing without prior environmental impact assessment and review.

The legislation is an attempt to pre-empt the Government's decisions on four important wilderness nominations. Three of the four wilderness areas contain rainforest which is only partly protected in national parks which are inscribed on the World Heritage List. The area of wilderness which can be logged without prior environmental assessment totals approximately 50,000 hectares.

The New England wilderness nomination is badly affected by the timber industry bill with over 30% of the wilderness nomination available for logging without prior environmental assessment.

The continued logging of Deua wilderness is a breach of faith by the Forestry Commission. The Parliament understood that the Deua wilderness would be protected until the assessment for both the logging activities and the wilderness nomination were complete. A loop hole in the Act, however, allows for ten year old reports to fulfil the environmental requirements. The outdated inadequate environmental impact statement should be rejected, otherwise the area will be logged out before the wilderness proposal is considered by Cabinet.

The old growth forest areas within wilderness areas are some of the last refuges of many endangered species. Yet the Timber Industry legislation permits logging of these key endangered species habitats.

According to Premier Greiner's policies, employment loss is acceptable when it saves money (eg reduction of 27,000 jobs in the public sector) but not when it saves the environment.

Only about 5% of the forest estate is in a wilderness condition, or about 200,000 hectares. Most of this area is difficult to log. There is 3.6 million hectares of forest outside wilderness areas. If these forests have no suitable timber resources, then these forests must have been grossly over cut. The timber industry has substituted short term profit for long term sustainability and forest workers should immediately be employed in establishing forest plantations.

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Colong Foundation for Wilderness

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	State Boundary
	Coastline Crown Land and Water Board Reserve
	Creek/River Freehold Land
	Road Leasehold Land

Colong Foundation for Wilderness . •

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November 1991

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Let's care for the environment ... hife depends on it.



P.O. Box 12.J. Bowraville 2449

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MEDIA RELEASE MARCH 11, 1992

The NSW taxpayers, the timber workers themselves and our Aussie animals will all be hard hit by the Timber Industry (Interim Protection) Bill according to Cr Lyn Orrego, spokesperson for the Nambucca Valley Conservation Association.

"The Bill basically authorises "more of the same" for NSW forests," she said.

"More of the same means continued unsustainable logging without proper assessment of what animals and habitat are being disturbed and lost, it means the NSW taxpayer's money will continue to drain out of the public purse to subsidise an industry already feeding on public resources and it will mean the end of an era for the timber workers who'll watch their own traditional hardwood industry decline in favour of woodchipping and their jobs with it," she said.

"The recent, concerted campaign against the Endangered Fauna (Interim Protection) Act and the part of the Environmental Planning and Assessment Act which requires an EIS in certain circumstances has tried to tell us that 6,000 jobs will be lost by June because of lack of supply due to the requirements of these Acts. This claim is as often repeated as "The Sky is Falling" in the children's story yet it is totally unsubstantiated with facts.

"So what sort of things can I tell readers now to substantiate the claims of the environment movement that forests, animals, people's pockets and jobs will suffer unless we stop the current "mining" mentality and realise we can and must have a timber industry with codes of practice that ensure the long term existence of both the industry and our native animals and vegetation.

"The Forestry Commission, in a 1987 paper, stated they were overcutting in 7 out of 19 Management Areas in the State. Many of these are still doing so despite Forestry Management Plans that say a much lower amount is the sustained yield. Examples are Casino West cutting at 21,000 cubic metres, four times the sustained yield; Nundle/Walcha cutting at 52,000 cubic metres, 4.3 times the sustained yield and likely to last only until 1997 when there will then be a 40 year gap. The plan is clearly to cut out all the old growth at higher than sustainable rates after which they will drop back

## je Macksville Management area

drastically causing job losses.

Nambucca "Our <del>Urunga</del> area is an example of an area that has already reached the stage following the cutting of the old growth. Quotas in the 60's were around 50,000 cubic metres. By 1980 they'd plunged to 8,000 and have since been struggling to achieve just under the 8,000.

"And it is not because of the myth that it's all "locked up". The area of land under State Forest in NSW has increased in size by 250,000 hectares in the last 10 years," she said.

"And yet the industry is declining. The number of quota sawmills is down 25% for the same ten year period. And it's not the big boys who are closing.

"Australia wide, between 1965 and 1985 wood production went up by 40% but the number of jobs provided went down 40%. Woodchip production employs less people than hardwood sawmilling. Sixty percent of Australia's forest production now goes to woodchipping.

"Regarding taxpayers money, in 1988, when the NSW Forestry Commission divided its commercial operations from its non commercial ones the Treasury assumed the Commission's debt burden of \$100 million in exchange for an equity stake. The Commissions first year commercial results showed a surplus of \$28 million, however, a tally of subsidies given to the Commission adds up to far more than \$28 million (non payment of dividends, lease fees for Crown Land, local government rates and charges, notional income tax on the surplus etc).

"Finally, regarding the animals themselves, the Forestry Commission often says it has never been proven that logging has caused any It also has never been proven that logging hasn't extinctions. caused extinctions. However, regional and local extinctions have been proven. For example in the Tenterfield Management Area the largest population ever found of the endangered Hastings River Mouse was found. After the area was logged four attempts were made to find the animal. It has never been found in the management area since," she said.

For further into contact Lyn Orrego 647478



PARLIAMENTARY SECRETARY TO THE PRIME MINISTER

CANBERRA

2 0 MAY 1991

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Mr J.L.O. Tedder Honorary Secretary North Coast Environment Council C/- Pavans Road Grassy Head VIA STUARTS POINT NSW 2441

Dear Mr Tedder

Thank you for your correspondence of 1 March 1991 to the Prime Minister about the provision of resource security for the forest and forest products industries.

The issue of resource security for the forest industry arose, in part, because the Government's commitment to ensure appropriate protection of native forests has resulted in significant withdrawal of resource previously available to the forest industry. For several months the forest industry has been adamant that a crisis of confidence exists in the industry and that future investment is dependent on Commonwealth resource security legislation. Given the importance of having major value-added projects come forward, and the general economic circumstances Australia faces, this was a problem which had to be addressed.

Under the circumstances, the Government decided that it was prepared to introduce forest resource security legislation for major new industrial wood processing projects, subject to certain conditions. These are that there is a capital investment of \$100 million or more; that there is a firm commitment from the company to proceed with the project; acceptance of a Commonwealth-State assessment process involving the application of relevant environment, heritage and aboriginal legislation; and that the State concerned is prepared to enact its own appropriate legislation. The resource security package will also contain provision for the establishment of plantations. The objective is to phase out woodchip exports and replace them with value added products. New plantations will also, over time, help take pressure off our native forests.

Yours sincerely

ROSS FREE

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TO FORM AN ORGANIZATION KNOWN AS THE FOREST FOUNDATION

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#### 1. OBJECTIVES

- a) To formulate forest management techniques which incorporate the values of economic viability, supply of recources to meet the need of the people of New South Wales and the forestry industry; biodiversity, ecosystem management and the enhancement of environmental values.
- b) To improve the economic and environmental value of the States forestry asset.
- c) To seek the co-operation, involvement and membership in the Foundation of representatives of the forest industry, the environmental and conservation movement, the general public and the scientific and academic community.
- d) To operate the foundation for the benefit of the people of New South Wales.
- e) To consider and recommend diverse environmentally sound and economically feasible management models for use by the Forestry Commission and private landholders.
- f) To liaise and associate with those organizations and individuals which have any similar aims and objectives.
- g) To seek, when necessary, the allocaton of lands suitable for the purpose of establishing and supervising the concept of species diverse native forests managed and utilised for the benefit of the people of New South Wales.
- h) To at all times meet the requirements of the Environmental Protection and Assessment Act.
- To register the organisation as a tax exempt Registered Charitable Institution persuant to S78(i)(a) of the Income Tax Assessment Act 1936 for the purpose of soliciting public and other donations.
- j) To raise funds from any source, (including government grants) for the specific purpose of financing any and all of the above objectives.
- k) To give and or make available money, facilities, equipment, assets, personnel and other resources to any person, trust corporation, firm association, institution, government, instrumentality of government municipal authority or other body for the purpose of carrying out any objective of the Foundation or for the purpose of setting up and or investigating the feasibility of setting up any trust, association or corporation for the purpose of carrying out any objective of the Foundation.
- 1) To accept and consider submissions on foresty matters and formulate recommendations for direction to appropriate functionary.

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#### GENERAL STATEMENT

#### THE FOREST FOUNDATION

IS A COMMUNITY DESIGNED CONSULTATIVE MECHANISM TO ACHIEVE A UNITY OF PURPOSE AMONGST ALL INTEREST GROUPS BY ESTABLISHING 'COMMON GROUND' ON THE MANAGEMENT OF STATE FORESTS BASED UPON;

- (a) Recognition of environmental values within forestry practices
- b) The hypothesis that an environmentally viable forest is a commercially valueable forest.
- c) The concept that the native hardwood forest can become a renewable and sustainable asset.

#### FOREST MANAGEMENT STATEMENT

ESTABLISH NEW FOREST MANAGEMENT PRACTICES;

- a) Through the consultative process of the Executive Advisory Council.
- b) By determining a set of environmental and commercial values.
- c) That maintains the natural diversity of the forest.
- d) That puts environmental value back into past and presently worked state forest for stable commercial and wildlife benefit.

#### EMPLOYMENT STATEMENT

TO REVERSE THE DECLINE OF JOB OPPORTUNITIES IN SMALL AND MEDIUM TIMBRT MILLS THROUGH NEW FOREST PRACTICES.

#### COMMITTEE OF MANAGEMANT

ELECTED BY MEMBERS OF THE FOUNDATION TO REFLECT PUBLIC INTEREST.

- (1) PROCESSES AND DISTRIBUTE SUBMISSION PAPER WORK
  - (A) Accepts submissions direct from public.
  - (B) Screens submissions to determin whether they fit the FOUNDATIONS objectives.
  - (C) Direct accepted submissions to EXECUTIVE ADVISORY COUNCIL (EAC) members for scruteny and responce.
  - (D) Individual responces from EAC members are returned to THE MANAGEMENT COMMITTEE for circulation to each of the other EAC MEMBERS.
  - (E) EAC scrutenise and respond to total discussion papers.( on site observations if needed)
  - (F) The COMMITTEE recieves final responces and calls a meeting with the EAC for final deliberation.
- (2) ACT UNDER CONCENSUS
- (3)THE COMMITTEE DIRECTS RECOMMENDATIONS OF FOUNDATION TO APPROPRIATE FUNCTIONARY.
- (4) IS SUBMISSIONS IS A SPECIFIC PROJECT IT WILL BE
  - (A) Subcontracted
  - (B) Supervised by FOUNDATION
  - (C)
- (5) RESPONSIBLE FOR FUNDING
  - (A) Marketing and public relations
  - (B) Submissions to government bodys, industries ect.
- (6) RESPONSIBLE FOR DISTRIBUTION OF FUNDING.
- (7) MAINTAIN UNITY OF PURPOSE.

#### EXECUTIVE ADVISORY COUNCIL (EAC)

APPOINTED FROM INTEREST GROUPS BY THE COMMITEE

- (1) RECIEVES APPROPRIATE SUBM SSIONS FROM THE COMMITTEE FOR SCRUTENY AND RESPONSE GIVING <u>ALL</u> RELEVANT FACTUAL DATA (procedure as (1) above)
- (2) EAC MEMBERS MAKE SUBMISSIONS TO THE COMMITTEE ON BEHALF OF THEIR INTEREST GROUP (procedure as (1) above.)
- (3) HAS AUTHORITY TO FORMULATE AND RECOMEND POLICY TO THE COMMITTEE FOR APPROVAL BY GRNERAL MEETING OF THE FOUNDATION.

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(4) ON REGULAR BASIS PROVIDE REPORTS TO ALL RELEVANT BODIES OR INDIVIDUALS.

#### FOREST FOUNDATION

Forest management and project submissions originate from individuals and interest groups within the community.



#### (1) WHAT PERCEPTIONS HAVE YOU, DEVELOPED AS A RESULT OF THIS TRIP.

(2) PLEASE LIST OTHER MATTERS YOU WOULD LIKE TO HAVE HAD DEMONSTRATED ON THIS TRIP.

(3) WHAT CONCEPTS PRESENTED TODAY FIT YOUR AGENDA.

(4) WHAT PARTS OF YOUR AGENDA CAN YOU SEE THAT WOULD STRENGTHEN OUR CONCEPTS.

(5) WHAT SUGGESTIONS CAN YOU MAKE TO ADAPT OUR CONCEPTS TO YOUR AGENDA.



P.O. Box 462, Wauchope N.S.W. 2446

15th April, 1991

Dear Jim

In reference to a proposed seminar date for the institution of the Forest Foundation.

The Forestry debate, as you are aware, is a highly political and emotional matter. Given that it appears likely there will be a State Election in May/June 1991, the committee of the Forest Foundation feels that it would be inadvisable to run the seminar in a volatile political environment. We do not wish to see the Foundation and its program become the subject of sectarian political agendas. To this end we have decided that the seminar date be put on hold till the stabilisation of the political environment.

During this period the Foundation intends to hold private formal meetings with all interested parties in order to brief those parties on the agenda, policies, formal administration and representative models of the proposed Foundation.

We propose that these meetings take place in May 1991, so that all parties can be adequately informed on the progress and function of the Forest Foundation.

Yours Faithfully,

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Jim Slater President

Trevor Corliss Vice President

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F.O.I.I. Campaign

Freedom of Information Legislation Campaign Committee

c/o Rupert Information & Referral Services PO Box 346 Dickson ACT 2602

## FOR

## INFORMATION

The Westminster system of government that has developed in Australia has been associated with a degree of official secrecy unmatched in comparable parliamentary democracies. Australian politicians must bear much of the responsibility for the failure of legislatures to write into our governmental system public and parliamentary rights of access to official information.

The purpose of this letter is to plead with you as a member of the Australian Parliament to take a responsible interest in public access to official information. We believe that parliamentarians should not be automatistic instruments of approval for proposals advanced by the Executive to demark the extent of the citizen's right to know. The public interest in access to official information must be given priority over pressures for political self-preservation. We hope you will have in mind, when considering proposals for freedom for information procedures, that the citizen's right to know has usually proved to be co-extensive in effect with Parliament's right to know. The time is overdue for Parliament to question how well the community has been served by the developing conventions of compliance with and sensitivity to the needs and practices of parliamentary Executives in disclosing official information.

As a first step, I ask you to read the attached Brief. It sets out in summary form some of the policy points at issue. On one hand are the policy proposals for freedom for information legislation submitted by the bureaucracy to Mr. Ellicott. On the other hand are our preferred policy alternatives reflected in a draft Freedom of Information Bill which is designed to give all practicable priority to community interests.

Our purpose is to promote adequate freedom of information legislation and to guard against fraudulent substitutes. We are anxious to assist and further advise you on the matter. I should be grateful to receive your advice as to whether you are prepared to commit yourself to generally bipartisan support for the preferred alternative policies outlined in the Brief. Representatives of this committee may be contacted through myself at Melbourne 347 4661 or Mr. John Wood - Canberra 489 484.

Yours faithfully,

<u>PAUL MUNRO</u> Campaign Secrétariat



ΉE	FOREST	FOUNDAT	ION

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P.O. Box 462, Wauchope N.S.W. 2446

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Phone	856	282
FAX	856	497

#### **ITINERARY FOR BUS TRIP**

#### <u>18th May, 1991</u>

Meet at Wauchope Post Office 9:00 a.m.

Departure 9:30 a.m. SHARP

Returning 4:30 p.m.

Climatic Conditions suggest trousers for warm clothing Morning Tea at Gingers Creek on way to Visual sites Lunch on return (approx. \$10.00 per head for M/Tea & Lunch) There will be a full commentary for the duration of the Bus Trip which focuses on those areas of common interest between Industry and Environment.

What we have in the Hastings we would like to share.

Written material on operation and function on the proposed Foundation will be available.

General enquiries should be directed to:

Jim Slater Beechwood Timbers

David Lee Beechwood Timbers

Phone 856 282 Fax 856 497 During business hours

Please indicate your intention and numbers, if groups, of attendance to facilitate our hire of bus capacity by 15th May.



#### GENERAL STATEMENT

#### THE FOREST FOUNDATION

IS A COMMUNITY DESIGNED CONSULTATIVE MECHANISM TO ACHIEVE A UNITY OF PURPOSE AMONGST ALL INTEREST GROUPS BY ESTABLISHING 'COMMON GROUND' ON THE MANAGEMENT OF STATE FORESTS BASED UPON;

- a) Recognition of environmental values within forestry practices
- b) The hypothesis that an environmentally viable forest is a commercially valueable forest.
- c) The concept that the native hardwood forest can become a renewable and sustainable asset.

#### FOREST MANAGEMENT STATEMENT

ESTABLISH NEW FOREST MANAGEMENT PRACTICES;

- a) Through the consultative process of the Executive Advisory Council.
- b) By determining a set of environmental and commercial values.
- c) That maintains the natural diversity of the forest.
- d) That puts environmental value back into past and presently worked state forest for stable commercial and wildlife benefit.

#### EMPLOYMENT STATEMENT

TO REVERSE THE DECLINE OF JOB OPPORTUNITIES IN SMALL AND MEDIUM TIMBRT MILLS THROUGH NEW FOREST PRACTICES. TO FORM AN ORGANIZATION KNOWN AS THE FOREST FOUNDATION

#### 1. OBJECTIVES

- a) To formulate forest management techniques which incorporate the values of economic viability, supply of recources to meet the need of the people of New South Wales and the forestry industry; biodiversity, ecosystem management and the enhancement of environmental values.
  - b) To improve the economic and environmental value of the States forestry asset.
  - c) To seek the co-operation, involvement and membership in the Foundation of representatives of the forest industry, the environmental and conservation movement, the general public and the scientific and academic community.
  - d) To operate the foundation for the benefit of the people of New South Wales.
  - e) To consider and recommend diverse environmentally sound and economically feasible management models for use by the Forestry Commission and private landholders.
  - f) To liaise and associate with those organizations and individuals which have any similar aims and objectives.
  - g) To seek, when necessary, the allocator of lands suitable for the purpose of establishing and supervising the concept of species diverse native forests managed and utilised for the benefit of the people of New South Wales.
  - h) To at all times meet the requirements of the Environmental Protection and Assessment Act.
  - To register the organisation as a tax exempt Registered Charitable Institution persuant to S78(i)(a) of the Income Tax Assessment Act 1936 for the purpose of soliciting public and other donations.
  - j) To raise funds from any source, (including government grants) for the specific purpose of financing any and all of the above objectives.
  - k) To give and or make available money, facilities, equipment, assets, personnel and other resources to any person, trust corporation, firm association, institution, government, instrumentality of government municipal authority or other body for the purpose of carrying out any objective of the Foundation or for the purpose of setting up and or investigating the feasibility of setting up any trust, association or corporation for the purpose of carrying out any objective of the Foundation.
  - 1) To accept and consider submissions on foresty matters and formulate recommendations for direction to appropriate functionary.

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24 APR '91 11:33

#### COMMITTEE OF MANAGEMENT

ELECTED BY MEMBERS OF THE FOUNDATION TO REFLECT PUBLIC INTEREST. (1) PROCESSES AND DISTRIBUTES SUBMISSION PAPER WORK.

- (A) Accepts submissions direct from public.
- (B) Screens submissions to determine whether they fit the Foundations objectives.
- (C) Direct accepted submissions to Executive Advisory Council(EAC) members for scrutiny and response.
- (D) Individual responses from EAC members are returned to The Management Committee for circulation to each of the other EAC members.
- (E) EAC scrutinise and respond to total discussion papers.(on site observations if needed).
- (F) the Committee receives final responses and calls a meeting with the EAC for final deliberation.
- (2) ACT UNDER CONCENSUS
- (3) THE COMMITTEE DIRECTS RECOMMENDATIONS OF FOUNDATION TO APPROPRIATE FUNCTIONARY.
- (4) IF SUBMISSIONS ARE A SPECIFIC PROJECT IT WILL BE
  - (A) Subcontracted.
  - (B) Supervised by Foundation.
  - (Ċ)

(5) RESPONSIBLE FOR FUNDING

- (A) Marketing and public relations
- (B) Submissions to government bodies, industries etc.
- (6) RESPONSIBLE FOR DISTRIBUTION OF FUNDING.
- (7) MAINTAIN UNITY OF PURPOSE.

#### EXECUTIVE ADVISORY COUNCIL (EAC)

APPOINTED FROM INTEREST GROUPS BY THE COMMITTEE

- (1) RECEIVES APPROPRIATE SUBMISSIONS FROM THE COMMITTEE FOR SCRUTINY AND RESPONSE GIVING ALL RELEVANT FACTUAL DATA (procedures as (1) above.)
- (2) EAC MEMBERS MAKE SUBMISSIONS TO THE COMMITTEE ON BEHALF OF THEIR INTEREST GROUP (procedure as (1) above)
- (3) HAS AUTHORITY TO FORMULATE AND RECOMMEND POLICY TO THE COMMITTEE FOR APPROVAL BY GENERAL MEETING OF THE FOUNDATION.
- (4) ON REGULAR BASIS PROVIDE REPORTS TO ALL RELEVANT BODIES OR INDIVIDUALS.

100 + OVES More than 70 Elands residents have called for a complete halt to regrowth thinning operations in the Wingham management area.

Elardo -> Taylors Gloucester

buying

The North

Coast Environment Council

from . Jenny Sheed Main Rd

Elande

from

Residents want a total stop to the current thinning operations until an environmental impact statement can be produced. This was one of seven esolutions passed at a public meeting on Monday night chaired by Alderman Mick Tuck.

Those attending the meeting included Jim Simmons and Brian Slater, represented the District Forestry Commission. Steve Collett of Taylors Chip Mill; Tea

## 0 seek chip work halt

--> Khoorangang\_

Gardens, Winston Greenaway, of Greenaways Bus Service, Elaine Alley of the Liaison Committe, representatives of the Oxygen Farm and Ian Head. principal of Elands Primary School.

According to Dekyong Sun, spokesmanan for the Elands residents, the meeting was convened to address six key issues affecting the local environment.

• The state of roads from Bulga Plateau to

Wingham. Woodchipping opera: tions at the end of Padmans Road. Woodchipping operations at Knodingbul. 🔅 • The volume and in-

tensity of milling operations in the Wingham management area.

• The number of woodchip trucks using the Bulea Plateau to Wingham Road during school 'ravel periods.

residents of the area / presented to Greater had expressed great concern about the number of trucks coming out of the Wingham management area each day.

"Three or four trucks with full loads pass out of the area each day carrying small under-developed trees, inche said.

"We believe the impact of the woodchipping operation has not been adequately addressed by a State Forestry Commission environmental impact statement.

"Factors such as erosion, soil content and time to renew the destroyed resource must be taken into account."

Concern for safety of local children travelling to school by bus each day was also raised at the public meeting.

"Safety of children travelling by bus to school each day has beec me of

great concern to parents in the area," Mrs Sun said.

"Roads are narrow and deteriorating rapidly, with many woodchip truck drivers showing blatant disregard for speed limits."

The public meeting, which ran for more than four hours made six motions to try and address

eriods. Mrs Sun said that many The three motions to be Taree City Council are:-· Council should upgrade the road to cope with current traffic levels. Council should re-

examine speed limits through built up areas being used for woodchip transport.

In view of damage to roads, council should give, consideration to making all weight load limit on main a road 109. . . .

The three motions to the Forestry Commission are:-

 That logging trucks do not use the road when school buses use it.

• That an alternative road at the western end of Padmans Raod leading to Knodingbul be upgraded.

· Forestry give consideration to reviewing environmental impact in the light of information re-

ceived from local people at the public meeting. Mouring Times 16/8/8

an average of 4. loads a day (to woodchip?) They say Brushbox taken from rainforest areas. 40%. to tapan Using a sophisticated komats harvester altenates & Straights" Trate. The latter because they are taking trees for woodchip from known koala Habitat "graights" also concerned at the quartity \$ Size of the trees - too much is being taken. Not opposed to sensible logging but they are vehenerty opposed to this & are ready for action. . . Straights = cattle fames = local timber getters = teachers. a petition to halt regrowth thing will an E.I.S. has been done was signed by 79 at the public neeting and nove over loo, in a commity of 300-350 Han's Daishowa rep Visiting the efficient, low-impact" machine, with G. Manager from EDEN MILL.

	Boral's Beneficial Jwnershir		Transfer General		m)Reserves Asset Revaluation	Contribu Group	
the Group's results.	9wnersing 9b	, Inc. in	\$'000	\$'000	\$'000	1990 \$'000	1989 \$'000
22. SUBSIDIARY COMPANIES (CON'T)							
Boral Limited		NSW				21,088	2,229
Boral Resources Limited*<	100	NSW				4,963	3,055
Boral Resources (W.A.) Ltd.*<	100	WA				11,241	10,454
Boral Resources (Vic.) Pty. Limited*<	100	Vic				16,275	20,846
Deanc & Runge Pty. Ltd.*<	100	Vic				(87)	(65)
South Western Quarrying and Asphalt Pty.		-					, -
Limited (In Voluntary Liquidation)*<	100	Vic				_	(1)
Western Washed Sand & Stone Pty. Limited							
(In Voluntary Liquidation)*<	100	Vic				-	(210)
Boral Resources (South Aust) Pty. Ltd.*<	100	SA				3,039	2,990
Dunnstown Quarries Pty. Ltd.							
(In Voluntary Liquidation)*<	100	Vic			-	-	-
Miners Rest Quarries Pty. Ltd.*<	100	Vic				(80)	(76)
F. Kennedy Fty. Ltd.*<	100	Vic				-	289
Riviera Sands Proprietary Limited*<	100	Vic				-	-
Avon Quarries (Holdings) Pty. Ltd.*<	100	Vic				-	-
The Avon Quarries Pty. Ltd.*<	100	Vic				<del></del>	-
Avon Quarries (Haulage) Pty. Ltd.*冬-	100	Vic				-	-
Boral Resources (Qld.) Pty. Limited*<	100	Qld	435		(435)	8,747	1,423
Rainsay Dredging Co. Pty. Ltd.*<	100	Qld					-
Karreman Bros. Pty. Ltd.*<	100	Qld				-	-
Australian Chemical Company Pty. Ltd.*< Q.A.R. Road Services Pty. Limited	100	Qlđ				93	84
(In Voluntary Liquidation)*< Q.1.C. Pty. Limited	100	NSW				-	-
(In Voluntary Liquidation)*<	100	Qld		33	(33)	206	-
Boral Resources (N.S.W.) Pty. Limited*<	100	NSW				23,984	18,518
Brisbane Water Concrete Pty. Limited*<	100	NSW				388	331
Bitumax Pty. Ltd.*<	100	SA				843	1,068
Spir-L-Ok Holdings Canada Limited>	100	Canada				-	-
Spir-L-Ok Industries Canada Limited>	100	Canada	l			547	208
Cascade Culvert Corporation>	100	USA				155	130
Quarry Industries Limited+	79.24	SA				5,490	6,627
Road Surfaces Group Pty. Limited	58.11	Qid				825	696
Bayview Limited*<	100	Vic					_
Bayview Quarries Pty. Limited*<	100	Vic				(2)	(2
Dandenong Quarrics Fty. Limited*<	100	Vic				-	-
Boral Transport Limited*<	100	NSW				14,761	11,521
All Products Haulage Pty, Limited*<	100	NSW				(68)	
Martin's Transport I'ty Limited*<	100	NSW				231	
Bell Tyres Pty. Ltd.*<	.100	WA				562	1,293
Belltread Pty. Ltd.*<	100	WΛ				(100)	7
Bell Freightlines Pty. Ltd.*<	100	WA				(1,903)	45
B.T.S. Pty. Limited*<	100	WA				68	633
Woodwards Tyres Pty. Ltd.*<	100	Tas				495	(54
LRH Pty. Ltd. (In Voluntary Liquidation)*<	100	NSW				-	. –
Allen Taylor & Company Limited* <	100	NSW				3,361	4,774
Sawmillers Exports Pty. Limited	80	NSW				3,711	3,841
Dawning of Stranorus Fusicianius u							
Bitupave Limited*<	109	NSW				4,153	4,337

Annuel Report 62

# Hallam pledges timber aid

The NSW Agriculture and Lands Minister, Mr Jack Hallam, has reassured the North Coast timber industry of guaranteed resource availability.

Following detailed and lengthy inspections of North Coast forests and timber mills last week, the minister re-iterated that the government would stand by its 1982 undertaking.

"Guarantees of continuing resource supply were an integral part of the 1982 rainforest decision," he said.

"We reserved certain areas of rainforest and hardwood timber on the clear understanding that remaining resources would continue to be available to the industry."

Since 1976, 69,400 hectares had been bought for forestry purposes at a cost of \$43.3 million.

In addition more than 375,000 hectares of crown land had been dedicated to forestry.

"There are no ifs and buts about the government's commitment. We appreciate the fact that industry cannot invest nor plan for the future while there is uncertainty about resource availability," he said.

said. "Our commitment to the timber industry has been recently reinforced with the large purchases of forests from CRA and APM. The government and the forestry commission are investing, and I believe the industry should also do so with confidence.

"As far as we are concerned, there is absolutely no threat of resource withdrawal and the industry can invest with confidence in a bright future."

The minister said he was well aware that there were conservation lobbies who want to place more North Coast forests in national parks.

"However, these groups realise, that a reasonable balance between

conservation and responsible utilisation of forests must be maintained," he said.

"I am personally determined to ensure this balance is kept."

Mr Hallam's remarks followed discussions with industry people. during his tour of Port Macquarie and Coffs Harbour.

"We are talking about one of Australia's biggest industries and one of our most important export earners. At a time of critical trade deficits, hardwood timber availability is essential for our economic welfare," he said.

"Hardwood, in particular, has an important role to play for future export earnings. "What we are talking about is

"What we are talking about is the livelihood of thousands of people, and the survival of whole communities.

"I want it known that my support and the government's commitment to its undertaking are unequivocal,"

10/9/90

#### INC.

Dear Editor.

<: ia,

Now hypocritical of the Forest Industries Association to talk about the need for balance in the debate about North Washpool to ensure continued employment.

The sawmilling industry has sustained itself for years on mining the States's forests and made little attempt to provide its own resources.

In 1982 a spokesman for the Country Sawmillers Association said "we cannot exist with re growth timber". So what happpens when the old growth forests have all been cut? How manyu hardwood plantations have been established by the industry since 1988? Quotas have been cut by the Forestry Commission but still industry says it is necessaray to move into the 5% that is old growth forest. 200 years Australia has reduced its forest cover by 50%. The Ϊn remaining 50% has been cut over and regenerated for 95% of its area. North Washpool, Chaelundi are part of the remaining 5% largely untouched old growth rainforests (some 45% of rainforest is under Forestry Commission control). Yet that is what the industry is after. Where is the balance? "All 22 Forestry Districts on the North Coast have sustained yield management strategies in place but in 7 of these districts there will be progressive quota reductions to achieve sustainable yields in the long terms" said the then Minister for Natural Resources in October 1989. In other words the Ninister admitted that "mining" of the forests still continues and old growth forests will be sacreficed.

The emotive issue of jobs in trotted out by the Industry Assoc. at every occasion where preservation of our old growth forests is debated. Where was the Industry's concern when Kookaburra Sawmill at Kempsey was bought out by a competitor in 1988 and 26 men lost their jobs? Where was the Industry's concern about jobs when the Wills Creek mill was bought bout by a competitor (1985?) and 30 men lost their jobs? In 1945 there were 4786Crown Licence Mills in NSW, in 1977 there were 165. What happened to all those who became unemployed due to mill rationalisation? Note that these closures were by the industry before new national parks were proclaimed. In 1939,8200 were employed on the North Coast region as timber workers. In 1976 there were only 633. reduction has been the result of new technology, lover demand,. This larger mills, supply problems and better productivity but does the Industry weep for these lost jobs? 

THURSDAY, JULY 24, 1986 35

T2a

## Taree sawmill closes down

MACLEAY ARGUS.

A sawmill at Taree has closed, another at Herons Creek is working at half capacity following the latest downturn in the timber industry.

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To retain their jobs 16 workers will have to transfer to other mills in the group following the closure of the Herons Creek Timber Mills 'Ltd mill in Muldoon Street, Taree.

The mill was acquired by Herons Creek Lysaghts a year ago. Part of the timber division of CRA Limited, it was then sold to Duncan Holdings Ltd. A Duncans company 1 mill at Wingham will continue to operate.

The company says the Taree mill and its .t machinery were all but worn out. The Herons Creek mill on the Hastings is now working at λĽ half capacity.

The problems there have been blamed on the se Broken Hill mine strike, as the Hastings mill ir ' has received no mine timber orders for two months.

In July last year the Herons Crek mill cut its be production from two shifts to one, sacking 35 be workers.

## Forest RRE 23.10.90 management forest

THE Secretary of the North Coast Environment Council Inc., Mr J Tedder, has suggested (Express Examiner, October, 2) that there is some degree of imbalance in the use of forested lands in Australia.

In support of this argument, Mr Tedder claims that only 5 per cent of our remaining forests are untouched, and says the timber industry intends to harvest all of it. This is typical of the misinformation constantly presented by the Green Movement.

In NSW alone, there are 3.6 million hectares of public old growth forest. Of this two million hectares are reserved in National Parks, and 1.3 million hectares in State forests have been excluded from harvesting. Only 0.3 million ha of old growth forest in State forest (eight per cent), is scheduled for harvesting and regeneration, very different from the 100 per cent as claimed by Mr Tedder. Indeed, where is the balance in the debate? The land use balance has been achieved, with 3.8 million ha in this State being included in National Parks and other reserves, while our State forests comprise 3.6 million ha. Surely that is balanced land use.

The consequences of adding more productive forest to the reserve system will be to decrease the sustainable yield we are able to supply from our forests. Unless we are all prepared to go without paper, wooden house frames and wooden furnishings, the net result will be increased importations of timber products from other countries. What is their forest management like? Can they supply the increased demand without overcutting? Do they have a balance of nature reserves and production forests? How will we pay for the imports? How do we justify our stand of preserving all our own forests while at the same time enjoying the products from someone else's forests?

Such questions should be considered by those who are calling for the preservation of all of our forests. Balanced land use has been achieved and is the only sensible option to pursue.

> DALE McLEAN, Forestry Commission Coffs Harbour

Jim, for your information, it appeared mi the hick hick hick Richmond River Express. Who is Dale McCkan? Steedy

Tza

### First Step in Saving South East Forests

HE State Labor Opposition's introduction of legislation to protect Tantawangalo, Coolongubra and several other areas by making them national parks was described by Pam Allen, Shadow Minister for the Environment, as "a first step in reviewing the nature conservation needs of the South East region". She described this as "the most urgent conservation need in the state. It is a clear challenge to the Premier to overrule his National Party colleagues and create 80,000 hectares of spectacular new national parks."

Pam Allen described the loss of old growth forests as a major environmental disaster. "At a time' when attention is focused on the Greenhouse Effect and depletion of the ozone layer conservation of old growth forests has become an im- . perative and not an option. If the Government continues its policies, we'll lose these marvellous old growth forests over a 20 year period."

## 100% Profit from Cheap Trees

#### by Jim Somerville, AM

One matter which receives no publicity in the woodchip debate is the financial position of Harris Daishowa By analysing the data filed with Corporate Affairs in Sydney, the veri of secrety can be lifted to some extent. It is in the public interest that local rest denua be informed of the company's immense profitability In 1988 (the last return filed) the net proful before tax was \$14.7 million on invested capital of \$7.5 million. After payment of tax a dividend of \$7.0 million was paid to the Japanese owners. The solling price of the woodchips has rison rupidly in recent years (19% since 1986) and in 1988 was \$77 per green tonne. Out of this, the Forestry Commission received an average royally of \$14. This pitifully small royalty has risen as a result of public pressure from a scandalously low \$3 per tonne in 1979, but is still only sufficient to give the Porestry Commission a relatively small profit. In their 1988 Environmental Im-

pace Statement they claimed that they made a profit of \$1,2 m, in 1985/86. Whilst the profit would be somewhat, higher in 1988, it pales into insignificance, compared with Harris Daisbows's magnificent \$14.7 million The average yield achieved by all companies listed on the Sydney Stock Exchange in recent years has been 6%. How dumb we are to allow a foreignowned company to mine our forests and declare dividends of 93% in 1988 100% in 1987 and 77% in 1986. What a shame the impecunious Mr Harrts opted to sell his share of the com pany so soon after operations begun. If he had hung in there some of these dividends would have remained in Australia: But then that was not what Dalshowa bad in mind, was it?

As with most major Japanese investments in this country, massive profits go back home and the guillible nosi is left poorcr environmentally and financially

## Call for Balanced, Legitimate, Noiseless Conservation

"We must maintain a balance between the legitimate need to preserve our natural environment and the economic imperative to develop our resources, while at the same time limiting the ability of small but noisy groups to delay or destroy major projects of national economic significance."

Address by Sir Rupert Clarke to the shareholders of the National Australia Bank, 25/1/90

#### A Greener Greiner

Mr Greiner's admission that the Coalition parties had often responded half-heartedly to the environmental concerns of middle Australia is welcome. His call for "a positive and dramatic repositioning of the parties on the environment", however, contained no positive proposals. The Colong Foundation has prepared, at its own expense, two well researched proposals for major conservation measures. These are our submissions for World Heritage listing for the Blue Mountains and a Nattai National Park and wilderness. Both are very practical measures which would cost the Government very little and prove popular. The Blue Mountains proposal is understandably held up awaiting NPWS examination. The Nattai Park proposal has not been approved because of the existence of sub-marginal coal deposits and the Government's reluctance to extend the national parks system. Approval of these proposals would lend credence to its call for "repositioning of the parties on the environment".





## Only Woodchips Matter

The Australian Museum has issued a report, within a cover labelled DRAFT ONLY, on Wildlife Conservation in the South East Forests of New South Wales, written by Graham H. Pyke and Paul O'Connor. The report confirms the views expressed by the Colong Foundation, so it is not surprising that it is labelled "draft", at the behest of the Forestry Commission we understand.

THE RECURRING theme of the report is that land use and land management decisions have never been based on adequate information. Planning is described as largely guesswork. "The results of wildlife surveys" the report states, "are not available for much of these forests. The effects of different fire regimes on wildlife are largely unknown. The effects of logging on many plant and animal species, especially understorey plants, invertebrates and uncommon vertebrates are unknown." The EIS's for logging are described as inherently biased.

In the Eden Management Area there is roughly 100,000 hectares of remaining old growth forests that is essentially unlogged, but is scheduled for logging, that conservationists have been seeking to preserve. These areas have been covered in the park proposals of the Total Environment Centre. The report nominates Coolangubra and parts of Nalbaugh and Bondi forests as having the highest conservation value. Other areas of high conservation value include Glenbog, Tantawangalo and Cathcart. It is recommended that existing wilderness areas should be maintained as such.

The report states that there is an urgent need for more species surveys, largely because five land systems are not represented in reserves of sufficient area. Concern is expressed about the survival of a number of species which require large areas of prime habitat for survival. They include the Spottedtailed Quoll, Brush-tailed Phascogale, two species of Potoroo and two species of owls.

The report states that predictions of long-term timber yield for the period 2013 till 2030 are unclear, and that the suggestions of SEFA for the cstablishment of eucalypt plantations on cleared farmlands and the use of thinnings have not been well considered.

The arbitrary role of the Forestry Commission in land use decisions is described as follows:

There has been and sull is little opportunity for interested parties to comment on land use and land-management proposals. There has been no apparent solicitation of comments on proposals for establishment of National Parks and Flora Reserves. In addition, comments are not generally sought with regard to the Regional Plan of Management prepared by the Forestry Commission.

In other words it is woodchips, not the environment or public concern, that matter to the Forestry Commission.

## Old Growth Forest

HE FORESTRY COMMISSION of NSW has been under attack from concerned conservationist for 20 years. It was in the late 1970 that the Colong Committee strongly opposed its appropriation of the Boyd Plateau, a reserve for the protection of flora and fauna, in order to plant *Pinus radiata* on part of what is now Kanangra-Boyd National Park.

This was the first of many transfers of tenure from Forestry to National Park, the most notable being 100,000 ha of rainforest in 1982. The battle lines are now drawn over the management of the relatively undisturbed old growth forests under the control of the Commission.

In a recent forest strategy, launched, be it noted, by the Premier and not the relevant Minister, it was admitted for the first time that "forestry is facing an increasingly difficult legal and political

#### by Jim Somerville

environment." The strategy was prepared to reassure the community that their forests would be managed on an ecologically sustainable basis and the Commission be publicly accountable and responsive to involving community concerns.

In an attempt to defuse the "legal and political imperatives" of the old growth issue on the North Coast, fourteen areas, totalling 180,000 hectares will not be logged in the next five years pending completion of environmental impact studies. It is no coincidence that four of the priority areas are currently the subject of injunctions obtained or threatened by conservationists in the Land and Environment Court, i.e. Chaolundi, Ben Halls Gap, Davis Creek and Blackbutt Plateau.

Additionally, the Commission has, at long last, reassessed its refusal to

develop eucalypt plantations. A token 200 hectares per annum will be planted compared with 5,000 hectares of pine. The present thinking is that the 300,000 hectares of old growth eucalypt together with 1.5 million hectares of regrowth and the plantation timber will meet the hardwood commitments made to the mills over the next 30 years.

No doubt the recently appointed Commissioner Hans Drielsma who succeeded the late Wal Gentle, is hoping that the eagle-eyed conservationists on the North coast (and there are now many of them), will not question the conservation values of any of the old growth forests destined to be logged. He should not hold his breath, for some conservationists when consulted, may well have other ideas, regarding the present strategy as a mere lull in a continuing campaign. The attached draft is an attempt to distill the philosophy and objectives of the North East Forest Alliance. Such a document could be used by members as a basis for discussions with owners of local sawmills and sleeper cutters If the Alliance is to foster more support from the local community it is essential that they know what the Alliance is trying to achieve. 20

Once this draft is agreed it could be sent to mill owners not the large Company mills, as a basis on which meetings could be based.

James L.O.Tedder 26 April 1991 In the early days of timber production in Australia there was a great deal of timber processing done at the site that the tree was felled. Pit sawing was , besides being rather unpleasant, an economically method to deal with logs and solve the problems of transport. The advent of bullock teams and later steam railways to bring logs out of the bush to steam driven mills lead to more forest and soil damage as roads were pushed into more areas. It was probally after the war in the early 1950s when a large demand for timber for house construction and the advent of the bull dozer changed the face of the forest. It was now possible with the new log trucks to push into the far reaches of the forests with the dozers cutting new roads and pulling out logs which would have been impossible or very difficult with bullock teams. There was a move too, to move mills out from the timber source to small towns and with the advent of larger and heavier equipment mills have become so settled that their previous sources of supply have long since been exhausted and now logs are trucked very long distances. The advent of cable logging now being used with devastating effect in Tasmania is probally the final tool to change the natural forest scene.

Until the last few years forestry operations were conducted by selecting the better trees ,removing them and then moving onto the next area,When bullocks were used ,or a cable system ,to haul the logs out to the road or log loading dump there was damage done to the soil, and to the understorey and to some trees.However most people agree that the damage was not heavy and within six months most of the visible signs of damage had vanished. But the dozer changed this and a dozer

,even a small one caused more damage than a bullock team.But in the last few years the very large dozer has appeared on the scene and these,equivalent of D8s, do far more damage than anything else.The impact upon the ground,particularly when turning is dramatic and they require a large area to do this manoeuvre.But because of their sheer size they damage many trees which are not being harvested.These damaged trees are no longer suitable for future saw logs and in some cases not as chip logs.

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ALL RADIES

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Perhaps the change over to a integrated logging method has been dictated by a number of factors namely:

- accountants have shown that it is cheaper to cut all the trees in one area than to have to return several times over a number of years

- so many trees are damaged by the larger machines it is easier and cheaper to take all.

- there are so few good saw logs available and it would be expensive to go into an area for one or two that it is more convenient to take all the trees at the one time. Then the trees not suitable for saw logs or sleepers or pallets can be sold for chips.

There are several end results to such a system

- there is generally a good strike of seedlings but they will often be of the one species and the net result after twenty years can be an even aged ,densely packed ,one species forest which will not produce sawlogs until natural selection thins them out and this may take a further eighty or more years.So the only choice beside hand thinning is to cut the whole area for chips.

- the other result can be a proliferation of Acacias which

will dominant the area for some years, repairing the soil but in human times, restricting the growth of the timber trees. A fire could kill the acacias but could also damage the new Eucalypts, as well as deplete the soils of nitrogen and phosphorus.

- the exposed area after intergrated logging is ripe for erosion with large areas of bare and disturbed soil. If the area is then burnt to encourage seed regeneration there is a loss of soil nutrients as well as organic matter and the soil is even more exposed to erosion

- often the tree which dominates such an area ,and is encouraged by the Commission is E.piluaris (blackbutt) which is now competing on the market with Pinus radiata for the house frame and general purpose timber niche.There would appear to be a diminishing market for blackbutt and particularly so if the Commission increase its charges to meet costs and the pine supply increase as all predictions show.

there is apparently a small but growing market, particularly overseas, which with the slowing up in rainforest timber supplies, will grow appreciatively for specialised hardwoods However with the present policy towards hardwood in native forests Australia may not be in a position to meet such a demand. There seems little encouragement given to E.grandis E.microcorys . One of the best cabinet timbers is Tasmanian silver top ash which is cut for wood chips.
the ecology of an area which is so badly damaged by

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integrated logging is changed in a number of ways little understood at present. The more obvious signs are fewer species, some of which may be lost to an area for a very long time. The change to the invertebrate population cannot be assessed because so little is known about it but it is believed to be the most important factor in the general health of an area The affect on the fauna is better understood and for many species it can mean extinction. There is not a great deal known about the effect on flora but as half the rare and endangered species on the North Coast are not preserved in any Reserve present forestry practices could indeed be affecting many species.

The North East Forest Alliance would like to see no forestry activities in any of the native forests.But they is a set of the set of the native forests.But they is a set of the set of the

> economic yield for the community over the long term ? If it is the latter then more attention needs to be given - to the market for specialised hardwood,

- to value added processes for local industries
- to differential royalties to encourage salvage logging,
- to more supervision of the actual logging to minmise damage

to the forest

- to improved and less destructive methods of log extraction - to a thirty year plan for hardwood plantations as recommended by the Public Accounts Committee on the Forestry Commission.Such hardwood plantations should be for pulp... wood and further that such hardwood plantations be established for the eventual supply of all sawn timber requirements. ALL DOLLARS ALL THE STORES

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The Alliance is opposed to any move into so called old growth on the following grounds;-

- there are only small areas of forest that have not been logged or only lightly logged many years ago, and such areas will not solve the long term problems of a shortage of saw logs.It will be a stop gap measure at a great cost.

- these areas are important in their own right as well as for the protection of fauna and flora.National Parks often do not possess the kinds of environment which are in these old growth forests and in any case are often too small for the survival of some species such as the powerful owl which needs a large territory and large old trees.

- we should not be the ones to destroy all the few remaining wilderness areas.Such areas will have even greater values in the future than now

- it will give a false sense of security to the local

community when there really is no security in cutting the remaining forests now in the hope that something else will be available five years hence. In any case many of these logs will be trucked out of the local community, at the expence of the taxpayer, to be cut by mills which have exhausted their own supplies.

The Alliance is opposed to the export of wood chips from the area.It is not opposed to the use of genuine sawmill waste for wood chips but it believes that there is in some areas a diversion of saw logs into chip mills particularly when the market for sawn timber is low.

The local community, the local sawyers, the sleeper cutters and the North East Forest Alliance should be working together to press for long term, changes to the forest management policies to ensure a future for local industry, and a future for the areas fauna and flora contained in the States forests. The value of the forests, many of which are on steep ground with shallow soils, for the protection of river catchments must be given more recognition

#### INC,

#### 20/3/91.

12.e

ABC Radic Tapes, GPO Box 9994, Sydney.

Dear Sir,

Could you please supply this Council with tapes of the following: 1 only EARTHWORM 6 March, 1991 1 only EARTHWORM 13 March 1991

And forward to the acve address. A cheque for \$30 is enclosed.

Yours faithfully,

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Jamès L.O.Tedder, Hon.Sac.
GUARDIAN NEWS - FRIDAY, MARCH 15, 1991 - 5

Resource security may not help Nambucca sawmillers-

The Prime Minister and Federal Cabinet. claim they have ensured the future of Australia's forest industry by endorsing the principle of resource security.

NSW Minister for Forests, Garry West, gave his qualified support for the move during a statement on Tuesday this week.

He said that the commitment to legislation was welcomed but that the \$100 million benchmark for projects to get resource security was questionable. "What security being offered is predicated on there being a pulp/paper mill development and is limited to individual projects of \$100 million or more," Mr West said.

This is not necessarily good news for Nambucca Valley sawmillers, who are unlikely to contemplate a project worth \$100 million or more.

In fact, if the comments of Mr Glen Neaves of Neaves Sawmill are any indication, resource security in the Nambucca may not be possible using Forestry Commission land.

Mr Neaves told the Guardian News

last week he believed some of the operations of the Forestry Commission of late leave a lot to be desired.

"They are logging areas that should not be logged, going against the traditional methods and taking the younger trees and leaving the older trees."

Mr Neaves said there was little timber left in the Forestry Commission areas throughout the Nambucca Valley. And yet, he believes private bushland

he relies on for the majority of his timber will be sustainable into the future. Employees of Neaves Sawmill at Warrell Creek are re-entering private bushland after 20 to 25 years...and obtaining more timber than when the business first logged the areas.

Mr Neaves said: "We are on our second cycle, going back into bush where we were 20 to 25 years ago. We are not getting bigger timber but we are getting more."

And he predicts that in 20 years they will return to those same areas again.



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Media Release March 12, 1991

Resource Security means a world scale pulpmill for the north coast unless the people of the coast can gain guarantees from their state and federal representatives that this won't be the case, according to the North Coast Environment Council.

"Resource Security is a win for the big players in the timber industry and a loss for the small sawmillers who are already losing logs to the chipmill at Tea Gardens," said vice-president, Lyn Orrego.

"The north coast should be shouting loud and clear against a worldscale mill with all its environmental disaster for the river its built on and the forests it consumes," she said.

"Instead we should be calling for one or two regional mills that can take various types of feed material such as: fibre crops, the presently wasted paper resource, genuine sawmill waste and forest thinnings. These mills should be environmentally "clean", non-chemical, produce non-bleached paper and not use a de-inking process. They will help the local economies whereas a worldscale mill, owned largely by overseas companies, will be a money funnel out of the country. Other avenues such as developing more value added timber products and composite timber products should also be explored," she said.

"We reject what the government and industry are calling resource security. Who's resource is it? The State Forests are the public's resource: yours and mine. And for who's security? It should **not** be for the security of multinational companies with Aussie taxpayers paying if the trees don't grow or are destroyed by fire. We need security for the sustainable management of our forests so they can continue to give **ALL** the things healthy forests give. . . such as microclimates, wildlife food and habitat, catchment and water production, build soil, disperse drainage, retard nutrient leaching, stabilise soil, trigger rainfall, oxygenate air, recreation, maintain gene pool, scientific values **AND TIMBER**," she said.

"The North Coast Environment Council will be pursuing these goals with elected state and federal representatives and candidates leading up to the next state election. The Council urges the people of the north coast do likewise so the natural values of the coast can be preserved and the local economy receive the benefits of the rich natural resource the forests of the coast offer and do this in perpetuity," she said.

For further information contact: Grafton: Martin Frohlich Coffs Harbour: Lyn Orrego

Jim

# Dear (sent to Andrew + Martin)

Enclosed is a press release re resource security sent to north coast media outlets. Below are some further comments to use, if you wish, if you are contacted by the media.

\* The industry should only have security over the resource they own/grow themselves as other businesses/farmers do.

\* Any so-called "rights" to public resources should only be given by the managers of the resource as is consistent with maintaining the resource sustainably.

\* How can quantities of timber be guaranteed? What if a fire destroys timber? - as it does. What if there's a drought and it grows more slowly? Why should the public pay big business if the quantities can't be produced?

\* Small sawmillers and the environment will be the losers in this decision.

\* Australia is being "ripped off". We are allowing a foreign company, Daishowa, to mine our forest of the south east. For an original investment of \$7.5 million Daishowa's net per annum profit before tax was \$14.7 million in 1988. After tax \$7 million dollars was paid in dividends to Japanese shareholders. This is an annual profit of 93%. In 1987 it was 100% and in 1986 it was 77%. The poor old Forestry Commission (us!) started out, in 1979, getting \$3 per green tonne of wood chips. The price has now climbed to \$14 a tonne but the company sells them for \$77 a tonne (1988).

\* The North Coast should be saying we want two or three mills that:

---can take various types of fibres ie fibre crops (such as water hyacinth, hemp, baggas) (Russia has 40,000 HA producing four times the yield per acre as trees do), recycled paper, genuine sawmill waste, and thinnings. ---is thermo-mechanical type, non-bleaching, non-de-inking, non-polluting

---leaves ALL forest values in good shape in perpetuity

\* In three to four years the southern pine will come in and hardwood will be harder to sell. The line is likely to be "But we CAN sell them for woodchips" In fifteen years thousands of hectares of eucalypts will come onto the pulp market from overseas plantations (eg Spain). So for the next fifteen years the aim will be to take all they can then they will demand a low, low price or else they won't buy and our once diverse, mixed species, multi-aged and multi-purpose native forests will be gone. They'll be harvested younger and younger (as is the trend already because of poor Forestry Commission managemnet which has allowed them to be mined). They will be forests that look like hairs on a dogs back, thin stems and thick growth.

## THE COST TO BRING COMMUNITY RADIO

## TO THE NAMBUCCA VALLEY

TOTAL COST	\$73,700
AMOUNT ALREADY SPENT BY R.N	\$50,000
AMOUNT LEFT TO SPEND	\$23,700
AMOUNT R.N. HAS READY IN BANK	\$10,000

# AMOUNT <u>NEEDED</u> BEFORE GOING TO AIR\_ \$13,700 \*\*\*

\* As can be seen from the numbers above most of the cost of providing Community Radio has already been met. This has been done over a period of SIX YEARS, by the Nambucca Residents who have kept Radio Nambucca Inc.going and growing.

# WHAT THE 23,700 DOLLARS WILL BE SPENT ON

UHF LINK TRANSMITTER, RECEIVER & EXCITER	\$8,000
POWER AMPLIFIER (main signal transmitter)	
ANTENNA (2 for UHF link, 1 for main signal)	
SMALL HUT ON MOUNT YARRAHAPINNI (secure)	<u> </u>
MAINS POWER TO HUT	\$ 700
STANDBY POWER AT HUT (used during power cuts)	
REMOTE SWITCHING GEAR (for transmitter control)	_ \$1,000
TO BRING STUDIO 2 TO BARE BONES STANDBY STATE (below this line)	
STRONG COUNTERS IN STUDIO 2	_ \$1,000
FINISH 12 CHANNEL MIXING DESK, FOR STUDIO 2	
BUILD DISTRIBUTION & MIC AMPLIFIERS	
LIGHTS & POWER POINTS STUDIO 2	
SPEAKERS FOR STUDIO 2	
TOTAL LESS FUNDS RADIO NAMBUCCA INC HAS IN BANK	\$23,700 \$10,000
***NEEDED***	\$13,700
WHICH OF THESE THINGS WILL YOU BE ABLE TO HELP FUND?	
IF YOU HAVE A BUSINESS YOUR DONATION CAN BE MADE IN EX FOR SPONSORSHIP WHICH IS TAX DEDUCTIBLE !!!	(CHANGE

- BUY PART OF THE RADIO FOR YOUR COMMUNITY!
- CONTACT RADIO NAMBUCCA 647-777 PO BOX 69 BOWRAVILLE OR ED ORREGO 647-478

GREAT LAKES ENVIRONMENT

#### ENT ASSOCIATION INC

President. Mrs. K.A. Smith 4/84 Bent Street, <u>TUNCURRY</u> 2428. Ph. (065) 54 7540

Secretary. Mrs. Linda Gill, Possum Pie Road, <u>WOOTTON 2423</u>. Ph. (049) 97 7263

Re: Resource Security

The Great Lakes Environment Association (Inc (GLEA) feels the recent, urgent moves by the Mining and Timber industries, with the backing of the Trade unions, for Resource Security, should be opposed vigorously:

The timber and mining industries have had Resource Security for the last 203 years, and this last ditch effort to gain access to the last of our battered country is appalling.

Resource security is 'disguised protectionism' and contradicts the Governments recent stand on reducing protectionism and increasing free trade, espoused in the latest round of the General Agreement on Trade and Tariff (GATT) discussions.

The proposal removes the timber industrie production and use from market forces, quarantines the existing industry operations from future influencing factors, such as the coming on line of bulk pine plantations and locks in' the existing inefficiencies and inequities.

The recent Public Accounts Committee into the Forestry Commission (Parliament of New South Wales, report number 52, December 1990) conferms these inefficent and unequal practices.

With the recent estimates by the Australian Bureau of Agriculture and Resource Economics (ABARE) states that consumption of saw ° timber ,plywood and veneer timber,will grow by an average of only 1% annually to 2005.Whilst the supply of plantation grown softwoods is expected to increase by 8% annually over the next 15 years.

By the year 2005 plantation timber will be able to meet virtually all our needs for the above uses.Softwood is eroding the domination of hardwoods.Between 1980 and 1988 the softwood share in the domestic production grew from 37% to 45%.This rate of displacement will increase as softwoods come on stream over the next 10 - 15years.

ABARE expects the contribution of waste paper to rise from 28% of fiber input today to 40% by 2030 (ABARE suggests that this is a conservative estimate.

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With the timber industries unwillingness to guarantee re-investment, which is not supprising due to their past history of broken promises, eg, Harris Daishowas refusal to re-invest, The Wesley Vale Act etc,.

Apart from the fact that most of the investment will require huge capital purchases offshore.blowing out import reduction targets, the proposals will mitigate against developing a transition stratergy, preventing restructuring and will stall the introduction of value added processes and products.

Any attempt to guarantee Resource Security will pre-empt:-

- The Resource Assessment Committee, Forest and timber inquiry.
- The National Forest Inventory.
- The Ecological Sustainable Development Committee(ESD).

On the subject of ESD, GLEA would like the following point clarified, the ESD Committee visited the North coast of New South Wales on the 13th, January 1991 and went to the Kendall Managment district, Port Macquarie region, for a site inspection, put on by the NSW Forestry Commission.

GLEA would like to know why there was no liasion with any of the peak environment groups on the North coast eg,North Coast Environment Council, the North East Forest Alliance or any of the local environment groups, concerning the site inspection of the States forests, ?.

Also was there any representation from the National Peak Environment groups such as the Australian Conservation Foundation, and if not why not.

Any attempt to guarantee Resource Security will be based on the (particually with the NSW Forestry Commission)present massively subsidiesed, under priced resource and will entrench the present status quo which currently prevails in the States Forestry Commission.

GLEA believes a fundermental question in the Resource Security debate is, Hoos resource for Hoos security and it is definite that the security is not for the Australian public but a small handfull of International Timber Exploiters.

Yours sincerly

Linda Gill

for the Great Lakes Environment Association

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Letter To Editor Advocate .... *₩*B Z BBB North Sta Darly Examine noming have Times

g/- J.Tedder Favans ACC. Grassy Head via STUARTS POINT 2441 065 690 802

> Director National Parks & Wildlife Service Hurstville rateiniM amirq ant ot rattal naqO

> > Dear Dr.Gillooly,

Please refer to the phone discussion [Boken:/reader 139 raad Please refer to the phone discussion [boken:/Tedder 1'inition adt hechietecon ruby representation vinitation a serie of vinitation a busy matter and your commitments with the minister and a busy because of your commitments with the minister and a busy doint no ersevit de rescussion of a to the bruck bon bluck them for a busy the not ersevit de rescussion of the minister and a busy the matter with the second busy the formation of the formation the matter with the matter with the formation of the second the matter we wished to discuss is urgent. bacommetica Vaib Pice Seressour data Vaib Pice Vaib Vaiber Structures State Views "Source security vaib State (1) and State Views "Source security values of the state of quotas had to be reduced it could not be done unless the Government paid compensation to the company taking the products. Already in Victoria where such resource security legislation is being experimented with cases are occuring where the forester sends in his estimate of what the forest can produce only to be told by head office that the quantity must be doubled. So much for good long term management dictated by the needs of the forest. Resource Security legislation is a greater risk to the saw milling industry of the North Coast than any threat to close off the "old growth" forest which, lets face it, would only extend the supply of saw logs by a few years. But this legislation will see wood chipping and the "big boys" take over.

Yours faithfully James I/Q.Tedder Hon.Sec.

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Hon.J.Kerin MP Minister for Primary Industries and Energy Canberra 2600 Fax 06 273 4120

Dear Minister,

Our Council urges you to carefully consider your position on the matter of Resource Security legislation.

The Government should not be pressured into making a decision which commits public resources to private use over a number of years on the threat that investment will be taken off shore.

Any committment to resource security may place future governments into impossible situations, for making decisions on resource use.

It would be a formula to lock industry into a set pattern for the use of resources in a particular way - inovation would be a loser if guarantees were given that there was no need for companies to ever consider their resource.

If future society wished a change in the use of the nations forests the costs for compensation would fall upn the average taxpayer while the Corporation would fold and vanish.

If industry had been concerned about resources then they would have moved earlier and more quickly into private plantations of far greater extent than they have done

If such resource security is given what security will society be given that the investments and jobs will be created ? Will governments be able to seek compensation , and from whom, if investments promised do not result.

This Council urges you to very carefully consider the matter for the sake not only of Australias forests and its flora and fauna, but of the local sawmilling industry which even now on the North Coast is in danger not from national parks but from an expanding woodchip industry and badly managed forests.

Yours faithfully James E.O.Tedder Hon. Sec. March 91

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## INDUSTRY PUSH FOR RESOURCE SECURITY A MAJOR THREAT TO THE ENVIRONMENT

In the last few months the forestry and mining industries, with the backing of the trade unions, have pressed the state and federal governments for long... term access to natural resources, through legislation.

This is the biggest threat to our natural environment to emerge for many years and must be resisted vigorously by the environment movement.

#### Federal Proposals

Senior Federal industry ministers want an 'overriding' Act to restrain the operation of the Australian Heritage Commission and Environment Protection (Impact of Proposals) Acts, once a decision is made to proceed with a project.

While an eis and review by the Australian Heritage Commission, will occur in the first instance - that will be the end of the matter.

The proposal effectively prevents further review in the light of new environmental information and/or changes in the scale and nature of the project. Environmental monitoring will lose all credence and the senior industry minister will be in charge.

The threat is enormous - imagine a small woodchip project protected by this legislation, that grows and grows - there will be no independent or effective environmental control. If such legislation had been in place in previous environmental issues, then the Great Barrier Reef and North Queensland rainforests could not have been saved.

#### State Plans

It is proposed that the new Commonwealth legislation would be triggered by a request from a state government and be accompanied by a complementary state Act.

Such legislation would override the NSW Environmental Planning and Assessment Act (EPA). We have already seen one attempt by the NSW Forestry Commission to evade its eis obligations in a new Forestry Bill, early in the Greiner Government and many Acts in the Wran years that removed major projects from the ambit of the EPA legislation.

Recently the NSW Forestry Minister, Gary West announced 15-20 year timber supply contracts that would prevent future national parks and open the way for legal action against the Forestry Commission if it could not supply the timber. (Daily Examiner 3/11/90) - see overleaf for developments in other states.

## WHAT YOU MUST DO

Oppose these moves to hand over our environment to industry.

Your group and members should write to the Prime Minister and Premier of NSW, URGENTLY. A decision will be made in a matter of a few months.

Inform us of your actions so that we can keep you up to date with this crisis.

JEFF ANGEL, Asst Dir Total Environment Centre; SUE SALMON, NSW Campaign Co-ordinator, Australian Conservation Foundation; JUDY MESSER, Chairperson Nature Conservation Council; KARENNE JURD, The Wilderness Society; ROD BENNISON, Director National Parks Association. The State Government/ Department of Planning is planning to alter EIS provisions soon 1. We need to develop our position on how the environment can be safeguarded through improving the EIS process. The following is provided for your comments.....

Problems with EISs

\* Many environmentally degrading developments do not legally require an EIS e.g. large scale residential development which is often staged and resort/tourism development as well as many activities that fall short of the 'designation threshold' (e.g. marinas of less than a cértain number of berths).

\* Under Pt V (EPA) public authorities produce EISs providing mandatory public input. If an activity is not considered likely to cause 'significant adverse impact' (Pt V), no EIS is required so there is no mandatory public comment on the activity.

\* Councils can designate development through their LEPs, but the Dept of Planning (DoP) will not allow this (this was attempted in Nowra).

\* Councils are not allowed to prohibit certain activities under their LEPs e.g. Byron Council was not allowed to prohibit sandmining.

\* The Schedule of Designated Development (PtIV) appears not to relate to the magnitude/impact of activities, but rather classifies types of designated activities.

\* Public authorities under Part V (EPA) are not sufficiently impartial to determine when an EIS is required i.e. when their activities will cause 'significant' impact as stated in the EPA.

\* Public authorities are not sufficiently impartial to review and arbitrate public comments and issue their own development consents.

\* Where there are no objectors to an EIS produced under PtIV or V the DoP has no concurrence role.

Please outline other problems you see...... How Do We Respond?

\* Amalgamate Parts IV & V of the EPA, with the DoP as consent authority (or Councils) ???

\* Expand the range of activities which are designated or change the definition(or trigger mechanism) of when an EIS is required??? The present term 'significant impact' (under Pt V) is too open to subjective interpretation.

\* All EISs should be referred to the DoP for concurrence (i.e. . . whether there were objectors or not).

\* The DoP must allow Councils to designate /prohibit activities under their LEPs.

\* Consultants should be registered with a government co op , which would set fees, pay consultants and select consultants to carry out EISs.

Do you have any other suggestions for how to make the EIS process more impartial??????

Please give me your comments, ideas, proposals a.s.a.p. at 14 Tallow Wood Crescent ,Byron Bay. 2481 Thank You. Dianne Mackey.

Ellzabeth Smith.

#### Questions for the Minister of Resources Hon.A.Griffiths MHR

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NATIONAL FOREST INVENTORY.

We understand that this inventory which was to take three years and has six months to completion and has cost \$20 million has still not identified the old growth forest. We understand that the reason for this failure to identify the old growth forests is that the NSW Forestry Commission has withheld the logging history maps.

According to the Public Accounts Committee the mapping section of the NSW Forest Commission has plenty of staff. Will the Minister ask the NSW Minister for Forests Hon.G.West that the logging history maps be made available to the National Forest Inventory without delay ? WOODCHIPPING

Has the Minister agreed with the NSW Minister Hon.G.West that there is need for the Forest Commission to do an EIS for woodchipping on the North Coast ?

We understained that the Commonwealths EIS will only examine the effects of woodchips on private land and on silvicultural thinnings.

Will the Minister ensure that the NSW complementary EIS examine -the impacts on the forests of removing residues ?

and whether sawmill wastes are really sawmill wastes and are not mill logs?

Removing residues from forests must have some significant impacts -nutrient loss ; soil exposure ; loss of habitat. and these should be examined carefully.

RESOURCE SECURITY

Asked at Coffs on 26 Feb 91 Questions Suggester by J. Corkell,



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P.O. Box 31, Murwillumbah. 2484 Phone: (066) 72 2488; Fax: (066) 72 4868

14th January, 1991.

## LETTER TO ALL BANANA GROWERS

I would like to advise all banana growers that the Committee has considered the proposed charge on growers for the 1991/92 year. At this stage a preliminary expenditure budget has been drawn up, and considered by the Committee. It is the intention of the Committee that all growers carefully consider the budget, and for that reason, the budget and the proposed charge on growers will be on the agenda for discussion at the next round of branch meetings, and District Council meetings, to commence soon. For your information, a summary of planned expenditure , and grower charge per hectare is as follows:-

SERVICE		<u>CHARGE</u> 1990/91	<u>CHARGE</u> 1989/90
Administration 💷 🔐 🖉 🕬	<b>3:4.00</b> 2. v		44.42
Advertising & Promotion	7.00	17.20	19.23
Information & Education	7.00	9.60	6.15
Grower Representation	7.00 · ·		20.00
Bunchy Top-Nth Districts -Sth Districts TOTAL-Nth Districts -Sth Districts	113.00 <u>29.00</u>	113.00 <u>29.00</u> 208.00 <u>124.00</u>	103.00 <u>29.00</u> 198.00 <u>124.00</u>

The Committee encourages all growers to attend the coming round of branch meetings to discuss these charges, and raise any queries with your local Committee Members.

Yours faithfully

Bob Héffernan Secretary

Constituted by the Banana Industry Act 1987

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#### **RESOURCE SECURITY**

Will there be mention of this subject in the 12 March Industry Statement ?

There have been a number of claims made of investments threatened if resource security is not given. What economic analyses have been made independantly of these industry claims ?

If there have been no independant studies done has the Minister called for such studies ? If not why not ?

Are there any guarantees that these investments will go ahead if the resource security is obtained ?

What off shore purchases might be involved and how will these affect the nations import bill ? It is of interest to nate that the Resources Assessment Commission draft report on the Coronation Hill area estimates a net benefit to the nation of the order of \$82 million which is somewhat different to some figures that the mining industry were using. What proposals for resource security measures have been

proposed besides those from Tasmania ?

We understand there is to be a"one off"environmental assessment for resource security. It is obvious that such a assessment will need to be very comprehensive. Are you anywhere near being in a position to make such an environmental assessment ? (in light of previous remarks about the national forest inventory )

24 February 1991

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National Parks Association of NSW

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Three Valleys Branch c/- J.Gray Richards Road Tewinga 2447

The Shipe Clerk; Kempsey Council

Dear Sir,

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At a recent meeting of this branch concern was expressed over the development of a huge camping area on the Grassy Head road at Grassy Head for the Seventh Day Adventists .

The concerns of the meeting were as follows:-

- clearing of the site appears to have been excessive and extended beyond the area necessary for the camp area. - many of the trees have had soil or sand cleared from around their root systems in the levelling process and they can now be in some danger of being uprooted in strong winds or die prematurely.

- there has been, in our view, excessive removal of the understorey and the fringing vegetation

- there has been heavy damage to the road between the quarry off the Stuarts Point road and the camp site caused by the trucks carrying fill for the site.

- what arrangements have been made for the disposal of ' septic effluent ? We understand that detailed proposals were to go to Council after the DA had been approved.We are concerned that unless this matter is very carefully dealt with there will be runoff at certain times into the Macleay Arm and that this could affect the fish habitat.

- the matter of the foot path to Grassy Head reserve has not, to our knowledge, been dealt with. The route of such path and its manner of construction should be open to public comment as it will be on public ground.

- we are not assured that the vegetation along the Macleay Arm has been given the degree of protection that will ensure that it remains in pristine condition. How does Council consider it can best be protected ? . . . .

We should be grateful for your Councils consideration of these points

Yours sincerely Tam 7.6. Tedde

James L.O.Tedder President 4/1/91

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90/1085 NRB

THE CABINET OFFICE NEW SOUTH WALES

## 1 1 FEB 1991

Dear Mr. Tedder,

The Premier has asked me to refer to your letter concerning resource security.

Mr. Greiner has noted all that you have said and appreciates the concern which prompted you to write. The New South Wales Government has expressed "in-principle" support for Commonwealth action on resource security, on the basis that it offers greater certainty for investors in resource processing activities and particularly in areas where long term capital investment is required.

The specific applications of this model and the mechanisms and processes are yet to be determined.

In any event it is clear that close consideration will need to be given to the incorporation of appropriate environmental assessment procedures in the process.

Yours sincerely,

Gary L. Sturgess Director-General, The Cabinet Office.

Mr. J. Tedder, Hon. Secretary, North Coast Environment Council, Pavans Acc., Grassy Head, Via STUART'S POINT. 2441

# Forests and jobs ---Can we have both?

David Dumaresq

Yes! is the short answer to the question. What is more we won't have forestry jobs if we don't keep our forests. At present we are keeping neither.

That's right! We are fast losing both forests and forest jobs in Australia. We are not losing forest jobs in Australia because the forest resource is being withdrawn - allegedly 'locked-up' in reserves and national parks. We are losing them because of over exploitation of the forest resource, mainly through the introduction of the socalled 'integrated harvesting' for sawlogs and pulpwood - better known as 'clearfelling'. We are also losing them because of structural changes within the industry, mainly through replacement of labour with capital through the processes of centralisation. mechanisation and automation.

#### UNPALATABLE FACTS

So let us all, conservationists and unionists alike, face a few very unpalatable facts. In 1970, when the export woodchipping industry started, there were some 108,000 employed in the total industry. This had fallen to 85,000 in 1985. This loss of 23,000 jobs is about 24 per cent of total industry jobs lost. But don't for a minute think that was because there was less wood available to be cut because it was locked up in parks or by some other mysterious mechanism. For the same period when the forest industry shed 24 per cent of its jobs it removed 46 per cent more logs from Australian forests.

By way of an aside, we are all very familiar with the claims of multiplier effects of employment generated. The forest industry claims up to sevenfold increases in general employment for every direct job in forestry. If the industry wants to claim such benefits

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then it has to also wear the responsibility for the multiplier losses when a forest job is lost. So the Australian forest industries may well be responsible for the loss of over 150,000 jobs generally in Australia since 1970.

Just so that we are very clear about job losses in the industry — the decline is evident in each of the three main areas of employment.

1. Forestry and logging jobs were down 40 per cent, with the 'felling and extracting' section most affected with a loss of 54 per cent from .1970 to 1984. (Remember at the same time 46 percent more logs were cut out of the forests).

2. Wood and woodproducts jobs were down 15 per cent, with the 'sawmilling' and 'resawn' categories down by 27 per cent. We should note in passing that over 50 percent of Australia's sawmills have closed since the early 1950s.

3. Pulp, paper and paper products employment fell by 21 per cent despite a 45 per cent increase in paper production. That should give us an indication of the real long-term employment prospects of doing more pulp and paper processing in Australia.

I hope that we can lay to rest once and for all the lie (and it is a lie) that conservationists have lost workers' jobs in the forest industries. The truth of the matter is that this lie has been perpetrated by the industry to cover what is truly happening. People are losing jobs because timber companies are employing fewer workers to process much more wood and because the timber resource is being over-cut.

We are now chipping today's sawlogs and even more stupidly we are chipping the next decade's, and the next decade's sawlogs and so on. We are converting our mature native hardwood forests into young regrowth forests devoid of sawlogs in any volume. These forests are increasingly being harvested by large machines and very few workers. The wood produced is increasingly being sold and exported in its least processed state, starving Australia of the benefits of any value added and employment generated.

The opening up of the few remaining virgin forests will simply delay for a very short time the inevitable depletion of our forest resources and the collapse of employment in the forest industries.





#### WAY FORWARD

But it is not enough for conservationists to simply cry 'not guilty' to job losses. We have to put forward positive proposals — especially to the union movement — on how to both preserve forests and generate employment.

I would like quickly to outline some short and long term proposals as to how we might do this.

1. In the forests that are being logged now, implement 'full utilisation' immediately. This will both generate substantial revenue and create employment.

I will give you one small 'real world' example of what I mean by full utilisation. A 60 acre test plot in eastern Tasmania near Buckland, was logged by the owners, the Gee family. The local chipping contractors were offering them a return of \$48 per acre with about one in 24 logs being graded as sawlogs, the rest chiplogs.

With careful supervision at logging, they were able to assign all logs to higher value end-uses than chiplogs, either as sawlogs, posts and poles, or firewood. This returned them over three times the income per acre ( being \$182 per acre). It also employed many more people for much longer. This process with appropriate local adjustments can be implemented anywhere in Australia. It could rejuvenate the failing sawmill industry and lower expensive imports of sawn wood, as well as providing (in suitable areas) increasingly valuable fuelwood.

2. Secondly, pulpwood royalties must be increased to more fully meet the real costs of 'integrated harvesting'. This could generate the revenue needed to launch the restructuring of the industry to conserve both jobs and forests. Australian woodchips are in a quantity and quality not easily replaced on the world market. I believe we are in a position to demand higher royalites. If we are to have woodchipping then it should be used to fund conversion to a sustainable forest industry.

3. We need to start processing the raw materials in Australia. This needs to be done carefully to avoid adverse environmental and social impacts. It is part of a long-term solution.

4. Finally, the other part of the longterm solution is to move the production of wood fibre (ie chips and pulpwood) out of native forests into plantations. Let us recognise the pulpwood operations for what they are tree farming. Let's move them out of forests onto already cleared farm land. There is a very large area of degraded cleared farm land in coastal and coastal escarpment Australia which could be rehabilitated by plantation forestry or agroforestry. A mixture of public and private forestry would be possible. This move would generate considerable employment within the rural areas that have already lost so many jobs. This would leave our productive native forests as true multiple value / multiple use forests producing through selective logging high value / high employment saw and veneer logs and speciality timbers as well as conserving wildlife, recreational, water catchment, wildemess and other values and uses.

We may well be able to have forests without jobs, but it is certain that without forests we will have many fewer jobs. We must work to conserve both and regenerate new forests and create new jobs.

David Dumaresq is a lecturer at the Australian National University and a member of the Conservation Council Forestry Working Group. He spoke on this issue along with Gavin Hillier, NSW State Secretary of the Australian Timber Workers Union at an Environment Centre fund-raising dinner held at the new Civic Youth Cafe on 14 May.

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#### FORESTRY COMMISSION OF NSW DORRIGO MANAGEMENT AREA ENVIRONMENTAL IMPACT STATEMENT

## CALL FOR PUBLIC SUBMISSION

In June 1990 the Premier, Mr Greiner, announced a strategy for increased public participation in forest management planning, particularly embracing the old growth forests of the North Coast.

The Forestry Commission intends to have an Environmental Impact Statement prepared for the Dorrigo Management Area, with emphasis on the unlogged areas concentrated in Chaelundi State Forest. This EIS is additional to that recently completed for compartments 180, 198 and 200, Chaelundi State Forest.

As part of the community participation process and to assist in the preparation of a comprehensive EIS, public submissions are now invited on those issues that the community considers should be specifically addressed. Individuals and groups are also invited to submit any data or other information that would contribute to the EIS. Issues previously raised in the 3 compartment EIS will be further addressed in this EIS.

The forestry activities to be covered are described in the Dorrigo Management Plan (1985), which can be viewed at Dorrigo, Grafton and Coffs Harbour Forestry Offices, and the Dorrigo Library. The activities are basically the harvesting of timber within Chaelundi, Cascade and Dundurrabin Groups of State Forest, and associated roading, together with other activities such as burning and grazing.

Interested persons and organisations wishing to comment are invited to make written submissions by <u>6/02/91</u> to

The District Forester PO Box 160 DORRIGO NSW 2453

Further details can be obtained from the District Forester, Dorrigo (Phone 066 572083) or Regional Forester, Coffs Harbour (Phone 066 528677).

Copies of all submissions will be forwarded to the Dept of Planning and the EIS consultants to be taken into account in the preparation of the draft EIS.

As is normal practice, the EIS will be placed on public display and ample time will be allowed for further public submissions at that stage.

#### FORESTRY COMMISSION OF NSW

#### DORRIGO MANAGEMENT AREA

### ENVIRONMENTAL IMPACT STATEMENT

#### BACKGROUND INFORMATION SHEET.

#### 1. Introduction

This document briefly describes the main elements of the EIS proposal in the context of FCNSW State and Regional forest policy and planning processes. The planning and policy documents set out the objectives for management of these forests.

#### 1.1 The Dorrigo Management Area

#### Location and Extent 1.1.1

Dorrigo Management Area covers the indigenous forest Crown-timber lands which lie generally to the north and north-west of the town of Dorrigo, which is the major population centre of the area.

The Area occupies the headwaters of the northward-flowing tributaries of the Clarence River. It lies within -

- Latitudes 29° 50' and 30° 20' S Longitudes 152° 15' and 152° 52' E \*
- \*

÷.,

- Shires of Bellingen, Nymboida and Dumaresq \*
- \* State Electorates of Northern Tablelands and Clarence

A location map is given in Appendix 1.

#### 1.1.2 Area and Land Tenure

The Area consists of all Crown-timber lands within Dorrigo Forestry District, Coffs Harbour Region, except for the 72 ha of exotic pine plantations on Wild Cattle Creek and Clouds Creek State Forests, which form part of the Coffs Harbour Softwood Plantation Management Area.

The Crown-timber lands constituting the Management Area cover a land area of approximately 100,000 hectares, of which 82% is State Forest.

#### 1.2 Natural Environmental Features

#### 1.2.1 Configuration

In general the topography is undulating with steep falls into the major streams of Bobo River, Nymboida River, Chandlers Creek, Guy Fawkes River, Blicks River and the Boyd River, which drain northward into the Clarence River system.

An estimate of the percentage of the forest area in various slope classes is given in Table 1.

Slope	Percentage of Total State Forest Area
$0^{\circ} - 10^{\circ}$	30%
$10^{\circ} - 20^{\circ}$	45%
$20^{\circ} - 30^{\circ}$	20%
$30^{\circ} +$	5%

Table 1. Slope Classes.

Forests of the Cascade group are about 600 - 750 metres a.s.l. There is a rise to the west to around 1 000 metres a.s.l. in Marengo and Hyland State Forests in the Chaelundi group. The highest point within the District is Mt Hyland at 1 434 metres a.s.l.

#### 1.2.2 Climate

The climate is warm temperate and characterised by wet summers and dry winters. The incidence of frost is significant and on average there is at least one fall of snow per year at over 1 000 metres a.s.l.

Summary data for representative stations is shown in Table 2.

Climate Factor	Cascade	Clouds Creek
Mean Annµal Rainfall	1 568 mm	1 397 mm
Mean Max. Temp. (Feb)	25.3°C	26.4° C
Mean Min. Temp. (July)	14.8°C	16.4° C
Mean Min. Temp. (Feb)	14.0°C	15.2° C
Mean Min. Temp. (July)	3.6°C	-0.3° C

Table 2. Climate Data.

#### 1.2.3 Geology and Soils

The parent rock over most of the area is of Palaeozoic origin. There is a series of late Palaeozoic sediments starting with the Carboniferous Moombil beds in the south and moving north through the Brooklana formation and into the lower Permian Coramba beds. An underlying Silurian formation surfaces in the north west part of the Area, south of the Boyd River. These are in the main fine grained siliceous argillites. Running north-west/south-east through the area are several upper Permian granitic intrusions of gabbro, granodiorite and diorite nature. Most of the Marengo State Forest is of this type. Scattered through the area are small outcrops of tertiary basalt, outliers of the extensive flows on the Dorrigo plateau. The fine grained sedimentary rocks give rise to red and yellow podsolic clay soils of only moderate fertility, but they are generally stable types and not prone to erosion. They occur over most of the Area. The granite-derived soils are deeper and more prone to erosion and particular attention needs to be given to this type in forest operations. Such soils occur mainly in Marengo and Ellis State Forests and in the south-west of the Chaelundi group. The relict basalt caps are in the main confined to a few small areas within Wild Cattle Creek and Moonpar State Forests and mostly produce red loams. These soils dry out quickly and can give problems in regeneration establishment.

#### 1.2.4 <u>Vegetation</u>

#### 1.2.4.1 Forest Types

State Forests of the Management Area have been surveyed and mapped on the basis of ecological associations of the main tree species. Six type groups have been identified and these are shown in Table 3.

	Area (ha) on State Forest by Group			Management
<u>Broad Forest Type</u>	Cascade	Dundurrabin	Chaelundi	Area
1. New England Hardwood	-	1998(20%)	23725(45%)	25723(43%)
2. Dry Hardwood	1342(7%)	400(4%)	18980(36%)	20722(25%)
3. Moist Hardwood	9397(49%)	4495(45%)	5799(11%)	19691(24%)
4. Rainforest	4987(26%)	1199(12%)	2109(4%)	8295(10%)
5. Blackbutt	3260(17%)	1598(16%)	1582(3%)	6440(8%)
6. Cleared, Non-forested	192(1%)	300(3%)	527(1%)	1019(1%)
TOTAL	19178(100%)	9990(100%)	52722(100%)	81890(100%)

Та	ble	3.	Forest	Type	Groups.

#### 1.2.5 <u>Fauna</u>

The Area forms part of a large block of continuously forested country with Guy Fawkes River National Park to the west and State Forests of the Grafton and Coffs Harbour Management Areas respectively to the north and east.

Throughout the area there is a highly variable mosaic of forest types and stand conditions ranging from young regrowth eucalypts and rainforest through to overmature stands. This results in an equally variable habitat giving rise to a large and diverse range of faunal species.

The Cascade and Dundurrabin Groups have had a long history of logging. On all areas except those intensively treated for regeneration, there is still a high proportion of mature and overmature habitat trees with nest hollows. The interaction of these stands in relatively close association provide suitable habitat for a large range of birds and animals. Former rainforest and moist eucalypt sites which have been established under flooded gum plantation on Wild Cattle Creek State Forest have shown relatively quick recolonisation by small native mammals, birds and reptiles. Extensive areas of New England and Moist Hardwood eucalypts on the Chaelundi Group of forests carry significant numbers of old growth trees and defective smaller trees after logging, and following logging significant regrowth and regeneration develops. The drier sites at lower altitudes in the Chaelundi Group are typically more open type forests of multi-age structure. Patches of rainforest, particularly associated with creeks or gullies are scattered generally throughout the area.

#### 2. Forest Policy and Planning Context

The Forestry Act of 1916 defines the power, duties and objectives of the Forestry Commission. Forest policies and Forestry Commission planning processes have been developed to meet these statutory obligations through appropriate management of State Forests and Timber Reserves.

The levels of planning used by the FCNSW are illustrated by Figure 1. The following section describes the levels of planning that are of relevance to the proposal.

#### 2.1 FCNSW Indigenous Forest Policy

The indigenous forest policy defines the objectives of forest management on a statewide basis. The basic policy statements that guide forest management are:

- "\* Indigenous forests have a continuing role in the production of forest products, principally sawlogs.
- \* Indigenous forests have continuing and expanding roles in the fields of recreation and education, wildlife conservation, catchment protection and scientific research.
- \* Development of these roles should be constrained so that future forest managers are not denied the opportunity to select from the widest possible range of forest uses.
- \* The many and varied uses of the forest are inter-related, and each contributes to a socially desirable, economic and practical pattern of forest management."

Source: FCNSW 1976

Other policy documents have been prepared that relate to specific aspects of forest management such as wildlife and fire fuel management.

#### 2.2 Dorrigo Management Plan

The current Management Plan for the Dorrigo Management Area became operative from July 1985. The Plan includes all State Forests, Timber Reserves and other Crown timber Land within the Dorrigo Forestry District, Coffs Harbour Region with the exception of areas of exotic pine plantation. The Plan sets out the management objectives for the Management Area. These are reproduced below.

- "1. To supply hardwood sawlogs to local industry on a sustained yield basis, to the extent consistent with other objectives.
  - 2. To utilise the productive site capacity of the Area effectively to the extent economically justified.
  - 3. To supply poles and other timber and forest products where economically justifiable.
  - 4. To maintain the Area generally under natural forest vegetation cover adequate to:
    - a. conserve the soil resources and water catchment capabilities;
    - b. maintain viable rainforest structure;
    - c. retain an aesthetic forest environment acceptable to the public generally;
    - d. maintain a diversity of habitat suitable to wildlife indigenous to the area.
  - 5. To maintain any distinctive ecological, historical, floristic, faunal or other scientific or cultural values occurring within the Area.
  - 6. To provide for public recreation.
  - 7. To provide for grazing and other forest uses where compatible with other management objectives.
  - 8. To maximise net financial returns to the extent possible under the other objects of management."

Source: FCNSW 1985



State Forestry Act Government STATUTORY .... POLICY E Forestry Forest Policies Commission of NSW PMP Classificatio STRATEGIC 2 TACTICAL/ OPERATIONAL Tactical Plans : 92.5 3 Imotementati FEDBACK 

#### Hardwood timber production objectives

Hardwood sawlogs will be obtained by harvesting of mature, overmature and defective trees from unharvested stands. Additional, small size logs, will be obtained from thinning regrowth stands. The rate of harvesting in the old growth stands will be regulated to a level that will supply industry until regrowth logs have reached an average size that meets appropriate sawlog criteria.

The regulated yield that has been developed for the Management Area is listed in Table 4.

Product	Maximum annual yield (cu m)
• Quota sawlogs	58 120 (gross)
In addition, the following volumes of other products may be harvested:	ŀ
<ul> <li>Poles, piles and girders</li> </ul>	2 500
• Hardwood veneer logs	10 000
• Small hardwood logs	19 500 - 30 000 (gross)
<ul> <li>Ex-quota sawlogs, salvage hardwood sawlogs, sleepers, posts and other timber and products</li> </ul>	Variable, dependent on demand and availability

Table 4. Regulated Maximum Yield by Product for Dorrigo Management Area.

The Plan describes the level of infrastructure development and management input that will be applied to particular areas within the Management Area. Road construction and maintenance standards will be limited to those required for effective harvesting, fire protection and public usage. Intensive management and protection will be concentrated on forests in the south east of the Management Area with low intensity long term future management in the more remote forests.

#### Ecological objectives

The Plan sets out the strategy being adopted to maintain an adequate natural forest vegetation cover and ecological viability and related objectives. Aspects of relevance to the proposal are reproduced below.

"Maintenance of an adequate forest vegetation cover and ecological viability and related objectives will be met essentially by:

Retention of adequate stockings of unmerchantable trees and vigorous advance growth.

Natural regeneration following logging, supplemented by planting as outlined in the timber production strategy of the Plan.

Protection from wildfire damage.

Other measures will include:

- The application of Standard Erosion Mitigation Conditions in harvesting, road design, road construction and maintenance.
- Exclusion from or modification of logging in specific areas of particular visual sensitivity.
- Retention of selected mature and overmature trees potentially suitable for wildlife habitat.

Distinctive values will be maintained by continuation of existing reservations free from disturbance; investigation and appropriate designations under the PMP classification and, where appropriate, dedication as Flora Reserves, and exclusion from or modification of forest operations to protect such values.

## Other Objectives

Provision for public recreation will be met by:

- Maintenance of existing facilities.
- Monitoring of usage and provision of facilities as justified by anticipated future usage.
- Maintenance of aesthetic values of existing and potential recreation areas.

Maximisation of net financial benefits will be achieved by continuing review of construction and maintenance programs, marketing strategies and operational procedures.

Other objectives will be met incidentally to the above.

Crown timber Lands other than State Forests will be managed according to expected future tenure."

#### Source: FCNSW 1985

The Management Plan specifies a range of prescriptions covering many of the activities and works that take place in the forest. Prescriptions define how the forest is to be harvested, roaded and regenerated. Other prescriptions define measures to protect wildlife and visual values. Prescriptions to prevent or minimise erosion during and after harvesting area also defined. Individual prescriptions have either been developed specifically for the Management Area or have state-wide application. Prescriptions vary between parts of the forest reflecting differing management priorities.

#### 2.3 <u>Preferred Management Priority (PMP) Classification System</u>

The Preferred Management Priority (PMP) classification process operates in tandem with the Management Plan in defining the management strategy for the Management Area and is more responsive to change than the Management Plan.

PMP is a map-based system used to identify and define priority uses or special management emphasis for all forests under FCNSW management. Under the system areas of forest are assessed and grouped into broad classifications which denote the FCNSW's long term management objectives. PMP classification is an important tool that assists in achieving many of the objectives of management set out in the Management Plan. Non-timber production objectives are met in part or in whole through PMP classification.

PMP classification employs a three stage classification which progressively classifies the the forest estate into one of thirteen categories.

#### 2.4 <u>Harvesting Plans</u>

Harvesting plans are the culmination of the forward planning process used by the FCNSW. The objective is to ensure that all the information necessary to mark out and conduct the harvesting operation are available. Plans are produced for each logging compartment.

The harvesting plan is in two sections:

- The first consists of a report which summarises the prescriptions to apply, together with an overview of the type of forest and anticipated yields.
- A map makes up the second part of the plan. This shows: the location of minor roads and log dumps, including wet and dry weather dumps; PMP special emphasis areas; filter strips protection strips; and other areas where harvesting is either modified or not permitted.

Harvesting plans link the proposal through the various levels of planning to the current policies and objectives of the FCNSW.

#### 3. The Proposal: Dorrigo MA EIS - Background

3.1 Context

The Dorrigo Management Area is nominated for EIS preparation in the Forestry Commission's EIS Strategy (1990).

A management plan has been published, dating from July 1985. The plan adequately covers the present situation, except for a few minor amendments.

The Forestry Commission has given an undertaking that no forest operations will be undertaken within a large tract of Chaelundi State Forest until or unless an EIS has been prepared and determined. An EIS for 3 Compartments within this injunction area has been prepared and will be determined with the primary purpose of maintaining supplies of tallowwood to dependent industries.

Currently, operations have been diverted to a less sensitive section of the MA, but some urgency is attached to completion of the EIS for the whole MA, in order to sustain the local timber industry without disruption.

#### 3.2 <u>Duration</u>

The EIS will be prepared to cover all forest operations for the remainder of the current cutting cycle, expected to be completed in about year 2010, and general management thereafter.

#### 3.3 <u>Description</u>

Harvesting and other forest operations within the MA shall be as prescribed in the current management plan. Hardwood timber harvesting will be undertaken in two types of stands:

- Mature/overmature stands, generally with a history of little previous harvesting (approximately 25,000 hectares).
- Thinning operations in well-stocked regrowth stands of larger tree size, to produce poles, veneer logs, quota sawlogs, small sawlogs and lesser grade products (approximately 58,000 hectares).

Approximately 1200 - 1300 ha of mature/overmature stands will be logged per year with construction of about 25 kilometres of access roads and tracks required annually. (Recent averages are 8 km/1000 ha class III and 12 km/1000 ha Class IV tracks). Areas thinned annually in regrowth stands will vary considerably.

No general purpose logging of rainforest stands is proposed although some very selective harvesting of overmature, damaged or dying trees may occur.

Other proposed activities which require consideration in the EIS include culling and/or enrichment planting following logging, burning for hazard reduction and regeneration promotion, grazing, various forms of public recreation, extraction of gravel for FCNSW use and for sale, and the sale of pulpwood from regrowth stands and the possibility of sale of salvage pulpwood from mature/overmature stands. Timber harvesting on mature/overmature forest will be concentrated generally in the Chaelundi Group of forests. Thinning operations will be located mainly in eastern forests. However, operations may occur throughout most parts of the area during the EIS time horizon.

#### 3.4 Issues

The primary issues, which have been identified are:

- Impact of proposals on high (special) arboreal mammal populations.
- Impact of proposals on wilderness values.
- Impact of proposals on rare and endangered flora and fauna (eg Hastings River Mouse).
- Possible impact of proposals on Aboriginal Heritage.

Other issues may well be identified by public responses.

Submissions are now invited on those issues that the community considers should be specifically addressed in the EIS.

J MURRAY DISTRICT FORESTER DORRIGO

# DORRIGO MANAGEMENT AREA

Appendix 1a



Major Forestry Access Road

Other Crown-timber Land



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C/- J. TEDDER PAVANS RD., GRASSY HEAD, via STUARTS POINT. 2441 (065) 69 0802

21 Dec 1990

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#### <u>News Release</u>

Pressure from some elements of the timber industry for Resource Security legislation is not likely to be of benefit to the small mills on the North Coast.

Mr.Terry Parkhouse President of the North Coast Environment Council said that the recent meeting of the Council was strongly opposed to the proposed legislation. It would lock the publically owned forests into the one use for many years regardless of changing markets, demands or the community wishes.

It could result in wood chipping operations being introduced into the North Coast by stealth as there would be no way for the public to object. The big winners of any such legislation would be the large and possibly the overseas company. The Forest Commission would have to guarantee supply for ten or fifteen years and would be liable for damages if such supply was not available. It would be interesting to learn if the Forest Commission is similiarly able to seek damages if it has produced a crop of one kind of timber but is unable to sell it.

There are grave environmental threats in such legislation in that if it was discovered that there were serious threats to the environment it is likely that resource legislation could not be over ruled. It is only the present Environmental Planning and Assessment Act of NSW and the Australian Heritage Act which is providing any brakes on a system which is driven by immediate Company profits and is not overtly concerned about the effects of its policies into the future. It is Governments role to ensure that future options are not foreclosed. Resource security legislation would foreclose future options for Governments and society.

for further information

T.Parkhouse	Ø65	690	<del>-80</del> 2	77(
A.Steed	066	213	278	
L.Gill	049	977	263	

mayor outlets a NC. Vadio, newspapers.

17 Dec 1990

At a recent meeting of this Council a resolution was passed unanimously expressing the Councils total opposition to any resource security legislation. Our Council represents some 37 member groups on the North Coast of NSW and therefore represents a large section of the community.

The Council considers that any such legislation should not even be considered before the report is received from the Resources Assessment Commission on its inquiry into the Forest and Timber Industry.

There are however more cogent arguments against such legislation. It would lock the community and the industry into a no change situation over a long period of time. It would inhibit the industry seeking to establish its own source of supply ,making the industry more than ever dependant upon the public resources and the Government. It would inhibit innovation in the industry and lock it into outmoded habits and practices.

It is impossible for the Government of the day or the industry to predict what their requirements of a particular resource may be in five,ten,or twenty years. If the Forest Commission manages forests for a certain type of hardwood in fifteen years,will the Commission be able to seek compensation if industry decides it does not require that resource?

There are grave environmental threats to such legislation in that if it was discovered that there were serious threats to the environment it is likely that resource legislation could not be over ruled. It is only the present Environmental Planning and Assessment Act of NSW and the Australian Heritage Act which is providing any brakes on a system which is driven by immediate Company profits and is not overtly concerned about the effects of its policies into the future. It is Governments role to ensure that future options are not foreclosed. Resource security legislation would foreclose future options for Governments and society.

Can you please assure this Council that such legislation will not be presented to Parliament, certainly not before the Resources Assessment Commission makes its report?

Yours sincerely

Price hunde

The major purpose of the community consultations will be to extract as many viable ideas as possible for regional enhancement, which can then be selectively assessed by the Regional Liaison Committee and consultants.

The tentative topics for the consultations are:

- . Agriculture/aquaculture
- . Secondary industry
- . Small enterprise development/tertiary industry (focus on extra-regional markets)
- . Tourism/recreation
- . Alternative tourism/recreation/healing
- . Education/training/retraining
- . Transport/infrastrucure/land use/human services
- . Access to finance
- . Arts
- . Use of Government owned land
- . Co-ordination of Government services

Each consultation will consist of up to 20 invited participants, selected for wide representation of interest groups but primarily for enterprise ideas.

The following groups will be represented by selected individuals, in each of the workshops:

- . Government agencies involved in regulation/assistance
- . Local Government/Chambers of Commerce
- . Private sector representatives from existing operations (big and small)
- . Employment/training agencies
- . Environmental/conservation/community groups

The relevant contacts for the Project are:

- . Community consultations
  - Mac Nicolson 066/213344
- . Project Co-ordinator
  - Ann Reed 066/857134

SOME ESSENTIAL COMPONENTS FOR A NEW FORESTRY MANAGEMENT AGENCY

Ze (hew)

PUBLIC PARTICPATION PROCEDURES - A FORESTRY ACT FOR THE 1990'S

#### A BOARD OF FORESTRY COMMISSIONERS

A Board of, say, seven Commissioners representing a broad range of public interest matters, from timber production, recreation, wilderness protection, wildlife conservation, bee grazing, water supply etc, should be appointed to direct policy reviews and oversee the operations of the new forestry agency.

The Commissioners should ensure that conflicts of the use or value of NSW native forests are resolved quickly and efficiently, through public particpation processes, and should aim to implement the public interest in its broadest sense.

AN EXPERT MULTI-DISCIPLINARY TECHNICAL ADVISORY COUNCIL A multi-disciplinary technical advisory committee of experts should be appointed, similar to National Parks Advisory Council, to provide independent expert technical advice to the Commissioners and the operational levels of the new forest agency.

These appointees should be expected to direct research priorities and play a trouble shooting role where crucial technical issues arise. A review of Priority Management Prescriptions and the Standard Erosion Mitigation Conditions should be immediate areas for revision and improvement.

#### SOCIAL AND ECONOMIC IMPACT ASSESSMENTS

Analysis of the social and economic consequences for forest management options should be prepared by competent independent consultants. The data and analysis of these option assessments should be publicly exhibited and comment invited.

Such a process would remove the current fiasco where unsupported assertions of the social and economic impacts of forest management options are made by vested interests, with no independent verification. Such assessment would ensure that impacts on local communities and economies, from forest management options, are mitigated or avoided.

EXHIBITION AND SUBMISSIONS ON MANAGEMENT FLANS AND HARVESTING FLANS Because State Forests are public assets, being managed by a public authority in the public interest, draft management plans or draft harvesting plans should be exhibited for

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public information and comment, just as Local Environment Flans, prepared by local councils are exhibited.

A new forest management agency should be required to consider public submissions made on these draft Plans and should be required to amend the drafts to take into account matters which are recommended in the public participation process.

People or groups who make submissions on draft plans should recieve a letter from the forest management agency explaining how the comments in their submission were adddressed or why they were not accommodated.

STANDING FOR ANY PERSON TO ENFORCE PROVISIONS OF A NEW FORESTRY ACT - TO RESTRAIN OR REMEDY ACTUAL OR THREATENED BREACHES Under Section 123 of the Environmental Flanning and Assessment Act, 1979, any person is able to undertake legal action to restrain or remedy a breach of the Act.

Such a provision in a Forestry Act for the 1990's is essential, if the public's assets are to be protected and the management of these forests is to be in accord with the public interest.

The days of unenforced Forestry Regulations, and continued breaches of logging and soil erosion codes must be terminated and a new era of competent forest mangement and use ushered in. Public enforcement of a new Act, Regulations, strict codes and operating conditions is long overdue.

J.R. CORKILL 14.10.1990 OUTLINE OF OBJECTIVES FOR A COMMUNITY SEARCH FOR NORTH COAST FOREST MANAGEMENT SOLUTIONS

#### INTRODUCTION

Preliminary, informal discussions with a wide range of interested and affected parties has indicated that there is general support for some dialogue on the issue of future management of North Coast State Forests.

The North Coast Environment Council suggests the following outline of objectives as a starting point for firming up an effective process for achieving the much needed dialogue and for moving towards possible solutions.

The NCEC has suggested the idea of a 'community search process' since the disputes are manifest at the community level and since it is felt that it will have to be at the community level that realistic options for solutions are developed.

#### A SUGGESTED PROCESS

The community search process to consist of a number of meetings of all interested parties, coming together in a spirit of co-operation to aim towards finding solutions to disputes regarding forest management on the North Coast.

These meetings should be 'referee-ed' by the impartial broker so that each interest group can have an opportunity for a frank expression of its concerns, clarification of its objectives and motives.

Invited to participate should be a broad range of interest groups, such as the Forest Protection Society, logging companies, Forest Products Association, North East Forest Alliance, Rainforest Information Centre, North Coast Environment Council Inc, concerned scientists and academics.

Initially, it is suggested that these meetings should not be open to any member of the public and should not be reported on in the media. There should be no intention to take votes or arrive at final decisions at this early stage.

The process for making decisions and arriving at solutions should only be the subject of further discussion once the preliminary objectives have been met, a level of trust and co-operation has been established and a commitment to an ongoing process has been reached.

Dnce the community search process has reached an advanced stage, local countillors, state and federal Members of Parliament should be encouraged to sit in on sessions and listen to the views of the participants.

# SUGGESTED OBJECTIVES FOR THE COMMUNITY TO PURSUE

The process of these meetings should seek to:

\*.identify issues currently provoking community concern;

\* identify areas of agreement and disagreement between sectors of the community;

\* identify issues or areas of concern where more information is needed or where existing information needs to be verified;

\* clarify the 'values' of interest groups which are in conflict without making judgements on these 'values';

\* identify areas where financial and/or human resources are required in order to effectively proceed with the community search process;

\* to sketch future stages of the community search process, possible further objectives, and decision making processes.

14.10.1990