

NATIONAL RAINFOREST CONSERVATION PROGRAM: NSW SCHEDULE

Action requested of Federal Minister for Environment - Senator Richardson.

At Federal Government Level

Restore funding priorities of Program to conservation and reduce heavy emphasis on development in Rainforest areas (see funding analysis).

Overhaul alternative NSW Government sources of revenue for proposed tourist related development (eg. NSW Tourism Commission) in Rainforest areas.

Indicate whether \$3,616,500 in 87/88 Program is totally Federal Government expenditure or includes NSW Government expenditure. If NSW contributed to this sum, by what amount.

18 projects in 87/88 Program are relisted from 86/87 Program. Does the 87/88 Program funding reflect:

- a) completely new funding for on going projects;
- b) funding unspent from last year and carried over to 87/88;
- c) a combination of a) and b);

If c) please advise the breakdown of new and carried-over funds.

Request Federal Government refuse to fund ad hoc infrastructure developments proposed outside of the rational planning process, (eg. the new Terania Creek walking trail) which cannot be supported by NSW conservation and environment groups.

At NSW Government Level

Request NSW Minister for Environment & Planning to direct NSW NP&WS.

- 1) to substantially redraft and re-exhibit Draft Plan of Management for Caldera Rainforest Parks (Border Ranges, Nightcap National Parks, and Numbinbah and Limpinwood Nature Reserves) to an internationally competent standard.
- 2) to conduct confidential detailed discussions with NCC re past, current and future direction of NSW Schedule of National Rainforest Conservation Program including specifically; what projects have been completely commenced, carried over?
- 3) to release relevant planning documents such as NP&WS Corporate Plan and NPWS State Policies to NCC.
- 4) prepare all future Plan of Managements such that management is completely consistent with NPW Act (and international convention where World Heritage Areas are affected)

- 5) cease and refrain from further non-essential development works in Parks and Reserves until these works are approved in a Plan of Management via the public participation process and rational planning procedures.

Specifically re: Big Scrub Remnants Survey Management Plan

Request Minister Carr to direct NPWS to ensure that:

- 1) Remnants discussion paper and management plan preparation is completely redrafted by competent, experienced qualified staff of NPWS, or if Service staff not available, by professional, experienced, local consultants, wildlife botanists and ecologists: NOT BY 'PLANNERS NORTH'!
- 2) public participation, including landholders, is permitted in commenting on redrafted Discussion Paper and subsequent Draft Plan of Management;
- 3) a suitably qualified community delegate from Lismore District Advisory Committee is appointed to the Steering Committee of the Big Scrub Conservation Strategy.

John Corkill
2 December 1987



MINISTER FOR THE ARTS, SPORT, THE ENVIRONMENT,
TOURISM AND TERRITORIES

24 OCT 1989

Mr John Corkill
Vice-Chairperson
Nature Conservation Council of NSW
39 George Street
SYDNEY NSW 2000

Dear Mr Corkill

I refer to your letter of 15 August 1989 to Gerard Early about the New South Wales component of the National Rainforest Conservation Program (NRCP).

As you would know, the NRCP is a collaborative Commonwealth/State program under which both the Commonwealth and the States commit financial and other resources to promote the protection of Australia's rainforests. Under the formal agreement governing the operation of the Program in New South Wales, the Commonwealth recognises the paramount role of the New South Wales Government in managing the New South Wales rainforests.

The New South Wales component of the NRCP commenced in 1986/87, with a Commonwealth contribution of \$1,618,000 and the State providing \$1,027,000 plus a staff and administrative in-kind contribution. In 1987/88, approved Commonwealth expenditure totalled \$2,220,250, matched by State funds of \$1,396,250. Total value of the proposed program is \$1,578,000 of which \$869,500 is to be provided by the Commonwealth and \$708,500 by the State. Only 27 percent or \$426,000 of the proposed program are new projects, the remainder being previously approved projects receiving additional staged funding or approved projects carried forward from previous years' programs.

You expressed some concern at the large carryover figure of unspent Commonwealth funds included in the proposed program. I am advised that this figure reflects delays in finalisation of land acquisition projects, unexpectedly long lead times in tendering for, and commencing work on, the two major interpretative centres and deferrals in construction of other visitor facilities. The monies have now been committed by New South Wales and have been accommodated within the NRCP budget for the proposed program.

Although delays such as these are most undesirable, they are not uncommon in the development of Commonwealth/State programs. I do not believe that they indicate "grossly inadequate financial accountability". Indeed, the New South Wales component of the NRCP has recently been the subject of a successful compliance audit by my Department's internal auditors as well as by the New South Wales Auditor-General.

The categories for funding of rainforest conservation which you advocate in fact reflect those which have been used in developing the NRCP. There is no specific formula for the allocation of funds to each program category, however, and the actual priority between categories must reflect at least in part the priorities of the States.

In this regard I note your reservation about enhancing access to rainforest thereby contributing to degradation through increased usage. Nevertheless, better visitor facilities, particularly educational and interpretative, will be vital in the task of securing greater community support for rainforest conservation. I see no conflict, provided we are careful, in encouraging appreciation of the aesthetic appeal and recreational use of the rainforest while also ensuring its proper protection and conservation. Indeed, I believe that promotion of tourism to boost regional economic development will become an increasingly important element of future rainforest conservation in Australia.

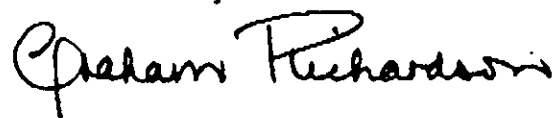
You also note that, in drafting the proposed program, the New South Wales Government undertook no consultation with conservation organisations other than two informal conversations by staff of the National Parks and Wildlife Service. Although the NRCP agreement between the Commonwealth and New South Wales does not specify such consultation must occur, I find its absence quite disturbing. I have referred the matter to the New South Wales Minister for the Environment and advised him that I will not be prepared to approve any further arrangements of this kind unless meaningful negotiations are undertaken with the conservation movement at an early stage of development.

Despite my concern about this situation, I am aware that the budget for the New South Wales component of the NRCP is now in its final phase. To a very large extent, the proposed program reflects priorities already agreed between the Commonwealth and State Governments. The proposed program was the subject of discussions between officers of my Department and the New South Wales National Parks and Wildlife Service earlier this year and I support the general thrust as agreed.

In these circumstances I plan to approve the current program proposed by the New South Wales Government. Future programs will, however, need to be the subject of much greater input from the conservation movement.

Thank you for your interest in this matter.

Yours sincerely



GRAHAM RICHARDSON.

CARLA

1/8/272/89

P 1

1. IDENTIFICATION(a) NAME OF PLACE YOWAKA FOREST AREA(b) OTHER (OR FORMER) NAMES EGAN PEAKS NATURE RESERVE, NULUNGA STATE FOREST SHIRE
COMMUNITY SITES**2. LOCATION**

(a) If located in a city or town

ADDRESS: Street _____ Suburb _____
City/Town _____ Postcode _____

(b) If located outside a city or town

NAME OF NEAREST SETTLEMENT (Use any town, village or homestead marked on a standard 1:100,000
or 1:250,000 map series)Name of settlement EGAN Town ☒ Village ☐ Homestead ☐Distance from nearest settlement (k.p.) 10 Direction from nearest settlement NW(c) APPROXIMATE AREA OF THE PLACE (ha) 613,400

(d) Not used

(e) PROPERTY DETAILS EGAN PEAKS NATURE RESERVE, NULUNGA STATE FOREST(e.g. Block/Section, _____
or County/Portion) _____**(f) DESCRIPTION OF LOCATION AND BOUNDARIES**If a description is needed to specify accurately the location of the place, the areas/features included
and the boundaries of the place, these details must be entered below or in PART BLOOK MAPS EGAN (8823) AND BEGA (8824)
see also attached sheet**(g) ADMINISTRATIVE LOCATION**State NSW Local Government Area Bega Shire
State _____ Local Government Area _____
State _____ Local Government Area _____

(If the place falls into more than 3 LGA's, please supply a separate list)

3. SIGNIFICANCE

A statement of significance defining why the place should be registered must be included in PART B

Egan Peaks area. To date 19 mammal species, including 6 arboreal species, have been recorded in the general area. Five of these, the Spotted-tailed Quoll, the Platypus, the Poather-tailed Glider, the Pygmy Possum and a Potoroo species, are listed as Endangered Fauna.

=====

At Iron Gates, near Evans Head, initial NPWS reports indicated no endangered species were present. Subsequent advice changed this finding. What measures do you propose to improve NPWS survey procedures in the future?

8. Track maintenance at Crowdy Bay NP and Hat Head NP have been undertaken with small bulldozers. Resultant damage had to be remedied by manual labour. Does NPWS have a policy on track maintenance? What costings have been done on the use of this machinery? Were Reviews of Environmental Factors (REF's) or Statements of Environmental Effects (SEE's) prepared before such major track work was undertaken?
9. Fire management - Smoky Cape in the Hat Head NP has been recently burnt over. This occurred over several days at one of the driest times of the year and the fire escaped in windy conditions. A greater area was burnt than originally planned. What plans are current for fire management in this or other NC national parks? What advice or assistance is available for local staff for fire management? Why were buffer areas along road margins not burnt rather than large areas? What threats are there to lives or property if there is a wildfire?
10. Is there a Plan of Management for the Little Tern? If so, has this Plan been put into effect? If not, why is there a delay?
11. Regional inventories of flora and fauna are vital for any planning for nature conservation. What measures are being taken to make resources for this work a priority? What funds will be available in the next 12 months for continuing fauna and commencing flora surveys within the Northern Region? Will these funds be sufficient? If not will it be possible to obtain further funds for this important work?

12. World Heritage. Naministia

13. Regional Liaison
 formal agenda @ 6 months. + local liaison
 NO. staff 1/3 Director / Dep. Dir.

PART B

(Please use additional sheets if space provided is insufficient)

1. RATIONALE FOR THE PROPOSED BOUNDARIES OF THE PLACE

(a) In general, the boundary represents:

- 6060 Natural vegetation cover 6064 Visual catchment boundary 6067 View from line or point
 6061 Natural ecological boundary 6065 Historical catchment boundary 6068 Cadastral units approximating 607...
 6062 Water catchment boundary 6066 Line to include diverse elements 6079 Other

6063 Elements in a certain condition (eg. wilderness, or lands not affected by logging, grazing, etc.)

(b) The boundary is drawn to:

- 6069 Include all significant areas 6082 Include all areas of high significance and minimise areas of little significance
 6081 Exclude all areas not significant 6089 Other

(c) Any additional comments on boundaries (including options):

2. DESCRIPTION OF THE PLACE - Natural Elements

SOIL	VEGETATION	TOPOGRAPHY	LANDFORM/GEOMORPHY	SOILS	VEGETATION
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The nomination includes 3. of the areas nominated within the "Nemacole Falls and Associated Rhyolite Outcrops" nomination, as well as "Nulla State Forest Shrub Community Site" and "Egan Peaks Nature Reserve."

The area is mostly unlogged and consists of very rugged, high relief country, rising from 150 m elevation in the east to over 700 m in the west. The Soil Conservation Service has classified some 60% of the area as having greater than 18° slope.

The geology is complex. Eden rhyolite is the dominant formation in the east and is typified by a number of rocky outcrops unique to a small area around Eden. There are also small outcrops of Lochiel Basalt which probably represent the only remaining naturally vegetated basalt in the coastal region. Further west, the rhyolite is replaced by Devonian conglomerates, sandstones and shales with Ordovician metasediments in the south-west. An area of granite and adamellite in the highest western part adjoins the Nature Reserve, which mainly consists of the only example of alkali intrusives in the region.

There are several poorly conserved plant communities in the area. The most important of these is Rhyolite Scrub which is entirely restricted to rocky outcrops in this area, and there is one other occurrence at Narrabarba Hill, south of Eden. These rocky outcrops support nine plant species currently listed by CSIRO as rare or threatened. Five of these species have extremely restricted distributions and are found nowhere else. They are *Phebalium calstonii*, *Westringia davidii* and three as yet unnamed species of *Zieria*, a relative of *Boronia*. With the exception of the *Phebalium*, these species are new to science. Numerous other plant species found on the rhyolite outcrops are unusual in being well outside their main areas of distribution.

Most of the area is dominated by *Eucalyptus sieberi* and *E. camaldulensis* open forest with an unusual vegetation which includes large areas of *Acacia*. There are also several stands of Warm Temperate Rainforest in the eastern part of the area which bear an interesting relationship to the Cool Temperate Rainforest at higher altitude in Egan Peaks Nature Reserve. Other poorly conserved vegetation includes stands of Brown Barrel (*Eucalyptus fastigata*) forest at exceptionally low altitude (below 200 m) and unusual stands of Messmate (*Eucalyptus obliquus*) and Monkey Gum (*E. cypollocarpa*) forest which is more typical of State Forests on the edge of the tableland. The small remaining areas of uncleared basalt support open forest of Maiden's Blue Gum (*E. maidenii*) and Coastal Grey Box (*E. bosistoana*) with a grassy understorey.

There is a broad diversity of animal habitats in the Egan Peaks area. To date 19 mammal species, including 6 arboreal species, have been recorded in the general area. Five of these, the Spotted-tailed Quoll, the Platypus, the Feather-tailed Glider, the Pygmy Possum and a Potoroo species, are listed as Endangered Fauna.

AGENDA ITEMS PROPOSED FOR MEETING WITH N.P.W.S. DIRECTOR & DEPUTY
DIRECTOR AND NORTH COAST ENVIRONMENT COUNCIL INC. 7/9/92
=====

1. NCEC understands that records of chemical residue testing of fauna have been removed from the regional Office by an ex-employee. Does NPWS hold duplicate copies? If not, will NPWS take steps to retrieve these originals?
2. Dead fauna submitted by the Clarence Branch of WIRES have disappeared from cold storage before chemical residue testing was undertaken. It is believed that the disappearances of fauna are continuing despite the relocation of the 'fauna freezer' to a more secure area. Will this matter be investigated?
3. Interstate transfer of koalas to Queensland has become a complex issue. What has been revealed by the recent investigation? Will this practice be regularised? + + + +
4. *Yes to be made available* Sampling data for organophosphates in birds' eggs was withheld by a Dr Layton Llewelyn (sp?) for 12 months before its release. Another report on chemical residues in wildlife, dating from 1987, has not been released. Why were these reports not made public?
5. Illegal logging has taken place on private land in the Nymbodia Shire. A short daylight inspection by a NPWS officer and a Nymbodia SC officer reported no evidence of koalas, despite reliable earlier reports. Nymbodia SC has now been informed by NPWS that NSC officers would be able to conduct inspections in the future without the need for NPWS officers. Why were no nocturnal surveys undertaken? Is this conduct subverting the operation of the EF(IP) Act? What action will be taken to correct this situation?
6. Aboriginal sites at North Creek, Ballina were granted 'permits to destroy' without reference to the Jali LALC. No reply has been received from NPWS to a letter from a member body of NCEC concerning an Aboriginal site at Kinchela, in Kempsey Shire. NPWS appears to have raised no objection to the sand extraction without an adequate survey. How does NPWS deal with such applications which affect Aboriginal sites? Why has it take so long to receive a reply from Port Macquarie District to queries over the Kinchela episode?
7. A DA for a canal estate at Dunbogan was given an 'all clear' by a NPWS officer. Subsequent investigations revealed the presence of endangered fauna. The first investigation by NPWS was inadequate and unprofessional. While this instance may reflect the pressures on NPWS, the report appeared to favour the developer at the expense of the environment. NCEC acknowledges subsequent excellent surveys by a NPWS officer.

< DRAFT >

p1

On NCEC letterhead!!

Mr Bill Gilloly
Director
National Parks + Wildlife Service
P.O. Box 1967
Kurstville NSW 2220.

per fax no. 02 5856455.

Dear Mr Gilloly,

Re: Review of National Rainforest Conservation Program (NCRP)

Include comments about
assessing areas outside
reserves - areas outside
reserves must be assessed
also

Not so personal - e.g.
attack on Geoff.

Mr-
Vidovic - Internal Audit

Thank you for your letter of and your advice
that...

You are no doubt aware, in general terms, of the concerns
of the North Coast Environment Council Inc and a number
of its member bodies, regarding the priorities, funding, project
selection, consultation and accountability of the above program,
following an urgent letter from ~~the~~ one of the Council's Vice
Presidents Mr John Corbett.

From the Council's review of the Program, it's apparent
that NCRP funds have been primarily used to construct visitor
facilities (walking tracks, roads, picnic areas, interpretative displays
and 'rainforest centres'); and to a lesser extent, to undertake
rainforest rehabilitation, prepare publications, research flying
foxes specifically; and to a very minor extent, to undertake
surveys of rare rainforest flora and fauna.

Regretably, only a very small percentage of the money
already spent (over \$7M dollars) has gone into compiling an

Submissions

13863 IV	HO	March 1981	EIS - Washpool Area Submissions	As above
13863 V	HO	March-May 1981	EIS - Washpool Area Submissions	As above
1504	Coffs Harbour Regional office	January 1983 - 15 October 1990	EIS ; Washpool	RO File for anthropological study. Related files DO396, HO 3623
11256 III	WTFRD	22 January 1987 - 17 September 1990	Wildlife Research - Coffs Harbour - General	Related files DO 171, DO 03.1, DO 02/6, RO 71, 1662 and WFRD 18570.
11256 II	WTFRD	July 1980 - 16 February 1987	Wildlife Research - Coffs Harbour - General	Principally Yellowbellied Glider, small mammal trapping and P. Oralis work. Related files RO 71, RO1639 CH Research 03.1, 03/3.1, 04.1.1, 01.1.
122	DO Casino West	31 July 1980- 28 September 1983	Big River Timbers (Veneer) Pty Ltd - Brushwood Logging Operations	Evidence of Casino West rainforests logged in 1980-2 by BRT to 50% canopy retention standard.
122	DO Casio West	29 September 1983 - 5 December 1986	Big River Timbers (Veneer) Pty Ltd - Brushwood logging Operations	Post-1983 negotiations re wood supply agreement and logging works in Ewingar SF.
122	DO Casino West	20 January 1987 17 March 1988	Big River Timbers (Veneer) Pty Ltd	Development of Pikapene plantation timbers for

inventory of NSW's Rainforests and generating an adequate ^{p 2/} data base with which to determine conservation and management requirements.

We believe that such a data base should have been ~~the~~ the first ~~phase~~ goal of a 'rainforest conservation program'. i.e. identify the location, components + status of NSW's Rainforest ecosystems, followed by ~~the~~ the determination of conservation priorities, from the base information obtained, including the identification of areas for urgent acquisition. Program projects for rehabilitation + management (development) of rainforests would then follow.

Members of the Council have sought, unsuccessfully, to persuade the NSW Program Manager, Mr Geoff Martin, of the need for ^{and the logic of this approach} this data base, in the few brief unsatisfactory meetings which have occurred over the last 4 years.

Unfortunately, due to the apparent lack of commitment to 'real consultation' by the Program Manager, and his penchant for an arbitrary 'ad hoc' ~~based~~ Program management and project selection, these meetings have effectively been a one-way communication exercise, where environment groups have been told after funding decisions have been made, "this is what we're spending NRCP funding on - don't say you weren't consulted!"

This tokenism has left the Council + its members most unimpressed and re-inforced our resolve to pursue a standard of consultation which involves the NPWS's serious consideration of input and ideas on rainforest conservation projects advanced by the groups whose actions over the last 10-15 years resulted in the creation of these same rainforest National Parks + Nature Reserves.

1502	Regional Office Coffs Harbour	December 1982 - 30 May 1989	Government Rainforest Policy - Cabinet decision on new parks and reserves	HO 13864, HO 13293. Contains important correspondence re hardwood logging by Grafton Sawmills in Casino West together with some revealing notes by Bruce and Howe on rainforest logging. It also discusses the tussle between the Ministers concerning the publication of the rain - forest policy booklet and discloses how amend- ments were made to the booklet to qualify the 1982 Cabinet decision.
11360 II	HO	March 1983	Washpool Fauna Study Total Environment Centre	Correspondence between Curtain and Osborne and Osborne's 1981 field report.
11360 I	HO	September 1980 - 26 January 1983	Washpool Fauna Study Total Environment Centre	Permit application records of discussions preliminary fauna records.
13863 II	HO	February 1981	EIS - Washpool Area Submissions	Submissions after public exhibition of EIS
13863 III	HO	February 1981	EIS - Washpool Area Submissions	As above
13863 I	HO	February 1981	EIS - Washpool Area	As above

Successive state + federal Ministers for the Environment have agreed to our requests for consultation and, no doubt, are disappointed that such 'consultation' to date has not been "fair dinkum".

We look forward to starting a consultation process with the NPWS which genuinely invites comments and suggestions for NRCP projects.

Such a recently advised proposal for 'real consultation' is therefore welcomed

As the first steps in this 'consultation' we offer ^{as attachments to this letter}

- * a series of criticisms of Program to date, in general terms, illustrated by specific examples; and
- * suggested projects which should receive serious consideration and priority for funding from the remaining NRCP projects.

which have been developed following discussions with the Councils members including Big Scrub, E.C. FNC NPA, Clarence Valley NPA, 3 Valley NPA, Rainforest Info Centre + others.

[As a further step, a more detailed critique of particular projects is now being finalised by north coast environment groups for submission to the NSW Treasury office, as part of the independent ~~audit~~ audit of the NRCP Program. A copy of this critique will, of course, be forwarded to you when it's completed.

At this late stage in NRCP, we believe it's essential to direct remaining funding into generating data on rainforest flora and fauna distribution, habitat requirements and conservation status, suitable for entry onto a rainforest data base that can be used for making informed management decisions and identifying future priorities.

13293 I	Head Office	30 November 1979- June 1980	EIS Washpool Area- Hinterland Logging	Early drafts of EIS
13293 V	Head Office	August 1982 - 10 September 1990	EIS Washpool Area- Hinterland Logging	Contains 1990 approval
13293 III	Head Office	30 December 1980 - 29 January 1982	EIS Washpool Area- Hinterland Logging	
	Head office	1980	Washpool early drafts	Ann Conway's notes in manilla envelope
	Head Office	February 1982	Comments on matters raised in submissions and forwarded to the DEP.	
1504 I	Coffs Harbour District	30 August 1979- 7 November 1980	Washpool Forest - EIS on proposed forest operations	Contains contributions by Howe & Hanson to the EIS preparation process. Related files LOA25, DOA 1949, HO13293, DOA 231
1504 II	Regional Office, Coffs Harbour	January 1981 - 24 December 1982	Washpool Forest - EIS on proposed forest operations	Post-EIS exhibition file containing negotiations with BRT on logging the Ewingar Circle in 1981 and 1982, development of alternative proposal by Forestry Commission and some interesting comments by Tony Howe on alternatives (buffers are a lot of nonsense) Related files A231,

The allocation of funding for projects outlined ~~below~~ ^{p.4.} in the attached schedule will enable the compilation of a rainforest mini-Geographic Information System (GIS) compatible with a broader forest GIS currently being prepared under the National Forest Inventory (NFI).

Only through the development of ^{such} a comprehensive GIS for North Coast forests, do we believe there will be an adequate information base for decision making affecting the remaining forests of the north east, particularly rainforests.

The Council remains prepared to engage in 'real consultation' and is therefore still keen to meet with you to be advised of the way forward in redeeming the NRCP as an effective means of achieving rainforest conservation in NSW.

Your early advice on this matter would be greatly appreciated

Yours sincerely

J.L.O. Tedder
Secretary

477	Casino District	October 1981 - 19 September 1989	Washpool Wilderness Area (and related topics)	Contains useful documents relating to the 1983 roading proposals and the Commission of the Wilderness nomination. It also maps the recently constructed survey trails.
2637 I	Coffs Harbour Area	25 February 1980- 25 July 1988	Brushwoods Management and Marketing : Coffs Harbour Region	Selective specialty sales recorded of rainforest timbers. Has background paper on rainforest logging together with references to a report by Floyd on Chaelundi Rainforest. Note regional forester's papers of 4 August 1982 "Real Alternatives for Rainforest Logging".
2637 II	Coffs Harbour Area	1988- 12 October 1990	Brushwoods Management and Marketing : Coffs Harbour Region.	Same as above. Note sales of Brushwoods up to \$200 per cubic meter.
15046	Head Office	4 February 1983- 9 January 1990	Washpool National Park	
13293 II	Head Office	June 1980 17 December 1980	EIS Washpool Area - Hinterland Logging	Contains significant documents relating to the criticism of the draft EIS by the DEP and responses thereto. Responses contain damaging admissions.

J. Correll

749



NSW
NATIONAL
PARKS AND
WILDLIFE
SERVICE

Mr. J. Tedder,
Honorary Secretary,
North Coast Environment Council,
Pavans Acc.,
Grassy Head,
-- VIA STUARTS POINT NSW 2441

Our reference:
Your reference:

Dear Mr. Tedder,

I refer to your letter of 15 December 1990 raising a number of issues relating to the National Rainforest Conservation Program.

The National Rainforest Conservation Program has been a major project for the Service over a period of years particularly within the Service's Northern Region. In fact New South Wales has received 63% of the State's Programs Funding for the period between 1986 and July 1990.

Whilst there have been many obvious achievements from the program I am concerned at the extent of the criticism directed at the program from conservation groups.

As a result of this concern I have asked the Deputy Director Policy and Wildlife, Mr. Peter Hitchcock and the Deputy Director Field Services, Mr. Alastair Howard to undertake a review of the proposed 1990/91 program before advice is provided to the Minister for the Environment.

One of the issues I have directed that the review address is consultation with conservation groups. As representations have been received from a number of groups I have indicated that the North Coast Environment Council is an appropriate body for that consultation.

Thank you for bringing these matters to my attention. You can be assured that I will not endorse any proposals for the 1990/91 National Rainforest Program until I am convinced that the advice of conservation groups has been adequately considered.

Yours sincerely,

W.J. Gillooly,
Director

1/3/91

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

J. Corkill



NSW
NATIONAL
PARKS AND
WILDLIFE
SERVICE

Mr James C O Tedder
Honorary Secretary
North Coast Environment Council
Pavans Road, Grassy Head
VIA STUARTS POINT NSW 2441

Our reference:
Your reference:

Dear Mr Tedder,

I refer to a number of letters and your telephone call to the Director's secretary on 29 November 1990 regarding the provision of detailed information relating to north coast new area proposals. I regret that this matter has remained unresolved for some time.

I am sure that your Council appreciates the significant workload involved in providing the information requested. You may be aware that in December, 1988 Mr John Corkill, then Project Officer with the Big Scrub Environment Centre Inc., sought similar information from the Minister for the Environment.

The Minister provided the information requested by Mr Corkill in a series of replies between March and July, 1989.

May I suggest in the first instance that you seek access to the information provided to the Big Scrub Environment Centre. That information provided the date of reference and the departments that were objecting to each proposal. The position of other departments generally remains unchanged.

With regards to the grounds for objection I suggest it is more appropriate for your Council to approach directly the departments involved.

The Service has been concerned for some time at lack of progress in relation to some new area proposals and more emphasis is to be placed on seeking to expedite agreement on these areas.

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

.../2

J. Corkell



c/- J. Tedder
Pavans Acc.
Grassy Head
via STUARTS POINT 2441
065 690 802

15 Dec 90

Director
National Parks & Wildlife Service
Hurstville

Dear Dr. Gillooly,

Please refer to the phone discussion [Boken?/Tedder 13 December] on the possibility of arranging a meeting with you during your Grafton visit 17-December. We understand that because of your commitments with the Minister and a busy schedule you could not spare more than a few minutes for a very general discussion. Reluctantly therefore we have agreed to postpone this meeting to a more convenient time even though the matter we wished to discuss is urgent.

This subject concerns the National Rainforest Conservation Program. The manner in which this program has been planned and administered has given this Council cause for concern for over a year yet we seem to be unable to achieve any review of the manner in which tax-payers funds are being spent. The Minister insists that it is a matter for the Federal Government; correspondence with your department has the matter being dealt with by the Manager Northern Region who is the planner and administrator so that there appears to be no effort to uncover the truth in any of our allegations about the lack of public consultation, poor planning, inappropriate use of funds. The present extensions to the existing schemes meanwhile are being pressed ahead with in what our Council considers undue haste. We feel there is sufficient evidence to call an immediate halt to these programs until an independent review is made of them.

Our Council will prepare for you a resume of our concerns about the NATIONAL Rainforest Conservation Program and the future directions of any future program. For example there are two areas of littoral rainforest on the North Coast which should be purchased from private landholders-both we understand are on the market yet there has been no allocation of funds for these land purchases. The Minister has claimed that more areas cannot be purchased as funds cannot be provided to manage them. Such land if in public hands will remain in reasonable condition without any management but the likelihood of their destruction in private hands is very high. Meanwhile there are many programs under way under the NRCP which will lead to high recurrent expenditure in the future

There are a number of other issues which we would like the opportunity to discuss with you and we shall list these with notes and have them to you by your return from leave. We would appreciate a meeting as soon as possible after the 22 January 1991.

Yours sincerely,

John, can you & Alcedo prepare?
John.

A. Steen



Director
National Parks & Wildlife Service
Hurstville

c/- J. Tedder
Pavans Acc.
Grassy Head
via STUARTS POINT 2441
065 690 802

15 Dec 90

Dear Dr. Gillooly,

Please refer to the phone discussion [Boken?/Tedder 13 December] on the possibility of arranging a meeting with you during your Grafton visit 17-December. We understand that because of your commitments with the Minister and a busy schedule you could not spare more than a few minutes for a very general discussion. Reluctantly therefore we have agreed to postpone this meeting to a more convenient time even though the matter we wished to discuss is urgent.

This subject concerns the National Rainforest Conservation Program. The manner in which this program has been planned and administered has given this Council cause for concern for over a year yet we seem to be unable to achieve any review of the manner in which tax-payers funds are being spent. The Minister insists that it is a matter for the Federal Government; correspondence with your department has the matter being dealt with by the Manager Northern Region who is the planner and administrator so that there appears to be no effort to uncover the truth in any of our allegations about the lack of public consultation, poor planning, inappropriate use of funds. The present extensions to the existing schemes meanwhile are being pressed ahead with in what our Council considers undue haste. We feel there is sufficient evidence to call an immediate halt to these programs until an independent review is made of them.

Our Council will prepare for you a resume of our concerns about the NATIONAL Rainforest Conservation Program and the future directions of any future program. For example there are two areas of littoral rainforest on the North Coast which should be purchased from private landholders-both we understand are on the market yet there has been no allocation of funds for these land purchases. The Minister has claimed that more areas cannot be purchased as funds cannot be provided to manage them. Such land if in public hands will remain in reasonable condition without any management but the likelihood of their destruction in private hands is very high. Meanwhile there are many programs under way under the NRCP which will lead to high recurrent expenditure in the future

There are a number of other issues which we would like the opportunity to discuss with you and we shall list these with notes and have them to you by your return from leave. We would appreciate a meeting as soon as possible after the 22 January 1991.

Yours sincerely,

Andy, Can you & John G. prepare?
James



C/- NSW Environment Centre,
39 George Street, The Rocks. 2000.
Ph 02 247 4206 Fx 02 247 5945.

<< CONFIDENTIAL >>

URGENT - FOR THE DIRECTOR'S IMMEDIATE ATTENTION

Mr Bill Gillooly,
Director,
National Parks and Wildlife Service,
Bridge Street, Hurstville. 2220.

15.2.1991

Per fax: 02 585 6455

Dear Mr Gillooly,

Re: National Rainforest Conservation Program operation

You will be aware of the longstanding dissatisfaction of the North Coast Environment Council Inc. about the priorities, project selection, funding methods and community consultation of the Program. These matters have been raised with your office, DASETT, the offices of the NSW and Federal Ministers.

Our Secretary, Mr Jim Tedder, advises me that these matters are to be discussed at a meeting between yourself and the North Coast Environment Council Inc. in the near future.

I write urgently to further alert you to an matter which Mr Tedder and I agree cannot wait for that meeting.

Recently I was advised confidentially that the Service has decided to act to address a number of these concerns by requiring an independent audit of the program's operation. This is welcomed by the Council, but may come too late.

Our urgent concern, following that recent advice, is that the program appears to be continuing to be operated most unsatisfactorily. Decisions are being taken now, which will entrench the unacceptable standards of management and accountability which are now to be independently reviewed.

If this situation is allowed to continue for another day the Council is concerned that the balance of funds available for the Program will have been inappropriately committed and the Service's ability to redeem the Program effectively stymied.

Please act urgently to prevent the continuation of this alarming situation.

Yours sincerely,
For the Land...

John R. Corkill
Vice-President.

DORRIGO CENTRE OPENED

SUNDAY 17 MAY 1991

Environment Minister Tim Moore today opened the new Dorrigo Rainforest Centre with its exciting "Skywalk", in the World Heritage Dorrigo National Park near Coffs Harbour on the NSW north coast.

Mr Moore said the \$800,000 Rainforest Centre, jointly funded by State and Federal Governments under the National Rainforest Conservation Program (NRCP), is designed to increase appreciation of our precious rainforests.

"As a community educational resource, together with new and existing visitor facilities in the park, the Dorrigo Rainforest Centre is an exciting and informative way to begin to discover the complexity, history and status of these fascinating areas," he said.

The Centre is situated on the very edge of the escarpment overlooking the rainforests of this 7800 hectare park, and the picturesque Bellingen Valley.

"One of the Centre's most dramatic features is "Skywalk" which takes visitors out over the escarpment edge for a unique close-up view of the rainforest canopy," Mr Moore said.

Dorrigo National Park is one of the most accessible World Heritage parks and with more than 120,000 visitors each year, one of the most popular.

"This new Centre is an important focus for rainforest conservation throughout the region. It is ideally placed as a visitor destination, being less than an hour's drive from Coffs Harbour, Bellingen and Nambucca.

Mr Moore said the Centre including "Skywalk" had been constructed by Dorrigo District staff and local contractors. "This magnificent facility is a credit to the abilities and dedication of the Service Staff involved. The obvious skills and experience developed will be a bonus for the Service into the future".

The Centre includes a visitor information service and sales centre. An evocative display traces the human appreciation and uses of rainforest throughout the ages. The theatre and lecture room for visitors and educational groups will complement a Field Study Centre being established in the park in conjunction with the Department of Education.

As an educational resource the Rainforest Centre is located within easy distance of excellent examples of all the rainforest types found in NSW", he said.

A new track, appropriately called the Link Track, now provides access from the Centre to the other walks and facilities centred around the popular Glade Picnic Area. A special feature is the "Walk with the Birds". This elevated boardwalk constructed with NRCF funding takes visitors into the normally inaccessible higher level of the rainforest.

Member for Coffs Harbour, Andrew Fraser, said the Dorrigo Rainforest Centre will play a significant role in increasing the local community's recognition of rainforest values of conservation and tourism. "A recent survey has shown that the rainforests of Dorrigo and nearby New England national parks contribute more than \$2.186 million and more than 58 full time equivalent jobs to the local community."

It is a poignant reminder that Dorrigo National Park is the best that remains of the vast areas of rainforest which once covered it and have now been mostly cleared. This Centre is an excellent way of ensuring that these remaining rainforests are used and appreciated by the whole community."

Mr Moore said the Dorrigo Rainforest Centre and facilities, together with the easy access to these valuable rainforests, all combine to offer some of the best educational and recreational experiences available on the North Coast. "The new Centre is a real focus for community conservation."

Information: John MacGregor (02) 368 2888



NORTH EAST FOREST ALLIANCE

SUBMISSION TO

N.S.W. PARLIAMENT - PUBLIC ACCOUNTS COMMITTEE

INQUIRY INTO FORESTRY COMMISSION OF N.S.W
(Retail Nurseries and Other Matters)

August, 1990

Prepared by

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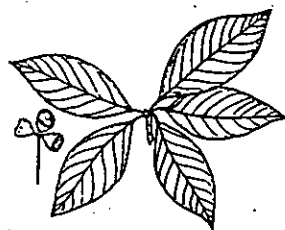
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ISBN



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N.E.F.A.

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0. EXECUTIVE SUMMARY

A recent Saulwick poll indicated that the majority of the community would rather significant forest areas were protected than logged. Protection was said to be more important than jobs.

An 'ecological imperative' which holds that we must consider the whole ecosystem and its myriad interdependent life forms, in making decisions is evident in the community.

North eastern NSW is one of the most biologically diverse regions in Australia and yet its forests remain the least researched and understood.

National Parks do not include all the representative samples needed to ensure the maintenance of genetic and biological diversity of indigenous flora and fauna and ecological processes.

Many species, associations and/or ecosystems, are not reserved and protected in perpetuity. An alarmingly high percentage of these at risk of degradation, fragmentation or extinction are located in State Forests or on private land. 54 distinct forest types are inadequately protected under the existing system of reserves.

Old growth forests on more fertile soils and moderate slope are poorly represented in the National Parks. The few remaining stands outside the Parks represent the major large sawlog resource.

The FCNSW is responsible for the management of the majority of north east New South Wales' remaining forests and is directly competing with the NPWS for use of land.

Forestry operations pose a threat to more than half the forested wilderness areas in eastern NSW. There will inevitably be extinctions of native species should forestry operations continue as planned.

State Forests should be managed to ensure the retention of natural values, particularly to protect habitats and individuals of rare and endangered species, but they are not.

Sustainable forestry, which is credible economically and ecologically over many generations under the full range of conditions is urgently needed.

NEFA is not opposed to logging or the use of timber 'per se'. It rejects the idea that timber production is the highest and overriding use of forests. It opposes logging where high conservation value forests are put at risk.

Additional forests will need to be permanently withdrawn from timber production if a comprehensive and adequate system is to be established and maintained. All areas under investigation should be withdrawn from timber production and other damaging management practices i.e. roading and burning.

(ii)

The addition of all major areas of 'old growth' forests to National Parks would not ensure an adequate fully representative reserve system. Numerous other species and substantial areas of non-forest communities would be required for a comprehensive system of reserves.

Any future reserve system which aims to be comprehensive, must recognise the importance that likely climate changes will have on species populations' distribution.

The exact areas or boundaries of areas required for removal from timber production are available for only a limited number of forests. These are the priority areas on which action for protection can and should proceed immediately.

An exhaustive schedule of areas needed for a comprehensive reserve system and accurate proposals for their boundaries cannot be provided at present. No NSW government agency has properly investigated the non-timber forest values of SF's, documented them and released this information to the public.

FCNSW is economically non-viable and ecologically disastrous, and needs an urgent fundamental overhaul to construct a competent, modern, ecologically sustainable, independent, multidisciplinary, management agency for commercial forests.

FCNSW is a historical anachronism, a moribund captured bureaucracy, entrenched in the status quo. It does not have the motivation, leadership, skills, information or vision that is needed to move towards a new era of forest protection, management and timber production.

The FCNSW's relationship to the NSW timber industry is very 'cosy' and is an impediment to the unbiased and impartial exercise of its responsibilities. It is not an 'arms length' public authority regulating vested interests.

The FCNSW will continue to oppose any further transfer of forests to the NPWS and is a substantial obstacle in achieving the secure protection of representative samples of species, associations and ecosystems.

The Public Accounts Committee has a unique opportunity to ensure that accountability, efficiency and effectiveness become hallmarks of NSW forest management by formulating recommendations to achieve these changes.

These terms must not simply receive lip service but reflect ecological and environmental values as well as economic ones.

FCNSW structure and operations are unaccountable and inappropriate for a public authority, managing a public resource in the public interest.

Information about forest ecosystems and management are not recorded or released to the public. Timber production is the limited perspective which directs management. All other forest values are subordinated to this.

(iii)

FCNSW's continued operation under archaic provisions and priorities ignores the endangering and extinction which many species, associations or ecological processes face in the relentless pursuit of timber production.

There is a lack of multidisciplinary expertise and interests among the Commission's staff. FCNSW's internal committee structure is inadequate and unaccountable.

FCNSW has grossly abused its forest closure powers to prevent accountability, to prohibit members of the public from inspecting work and compliance with NSW and Commonwealth laws, and if not properly regulated will continue to do so.

FCNSW planning procedures and documents are unsatisfactory since they are based on no actual research or understanding of the forest ecosystems. They often ignore relevant information and appear as blatant and biased justifications for the intended works.

PMP Prescriptions are 'inadequate' and are likely to seriously compromise many of the biological & conservation values identified for the forests of the north east NSW.

FCNSW's reserve system is comprised of Flora Reserves, Forest Preserves, and special emphasis areas marked on Preferred Management Priority maps. These are inadequate to meet the conservation requirements of State Forests.

FCNSW continues to use a perverse definition of rainforest ~~not accepted anywhere else in Australia~~ which classifies forest on the presence of commercial species not on the basis of forest structure and ecological indicators.

Rainforest logging continues overtly and covertly. No phase out of rainforest logging has been achieved 8 years after the 1982 government policy was announced.

Detrimental activities should be removed from all rainforests, old growth forests and areas nominated for Wilderness dedication while these areas are assessed by NPWS.

FCNSW is unwilling to accept that other legislation in NSW, e.g. Wilderness Act, may legitimately alter the use of land for the purpose of protecting forests and associated values.

Part V of the Environmental Planning and Assessment Act 1979 has a clear and unambivalent requirement that before any works commence, FCNSW must study the forest it is managing and proposing for works.

There is a separate obligation to produce an EIS where works having a significant impact upon the environment are proposed

FCNSW routinely fails to undertake floral, faunal, and archaeological surveys to document the range of forest values extant in an area prior to roading and logging operations.

(iv)

Without this fundamental baseline data, the FCNSW is quite unable to evaluate the impacts of its forest practices, let alone design procedures which will mitigate the many negative impacts.

The FCNSW's continued abrogation of its responsibilities under the EPA Act have provoked a series of expensive injunctions in the Land and Environment Court, aimed at forcing FCNSW's compliance with these laws.

FCNSW's forest practices have the deliberate intention of significantly modifying the natural environment to achieve perceived benefits for timber and beef production.

The value of these modifications to timber production remain unquantifiable, because of inadequate accountability, since inadequate information is available to document the management activities and their effects.

Management of State Forest appears to be one huge series of experiments.

Road construction, logging, burning, and grazing have serious and significant actual and potential negative impacts.

Many native animals are disadvantaged or killed by logging operations, native forests are degraded and the actual composition of species within forests is dramatically altered.

The soils of many forests are being negatively affected through the construction of roads into forests and the use of machinery off forest roads. Poor forest management practices have serious consequences for water quality and quantity.

The fire frequency used by FCNSW is a significant factor in continued high levels of CO₂ emission in NSW. Millions of tonnes of carbon are released into the atmosphere annually in NSW due to logging and burning.

FCNSW's assertion that its unloggable areas, tiny filter strips/ wildlife corridors and management prescriptions are adequate for species preservation demonstrates the almost total lack of expertise and understanding necessary for wildlife conservation management, within FCNSW.

Sustainable yield policies exist but are still not operated in all Districts and where implemented are often dubious. Only greater utilization standards have enabled the sawlog industry to keep going in many areas.

Woodchipping began on the north coast in 1982 and the industry has secretively expanded. Export woodchipping is a low quality use of our forests and an abuse of timber resources since there is no value added to raw forest materials in Australia, and once applicable costs are taken into account, is costing NSW taxpayers dearly.

(v)

There are already more than sufficient pine plantations established to satisfy our future needs. Yet the Forestry Commission is still intent on clearing native forests for pine plantations.

? [Despite unprecedented level of resource availability, the number of sawmills supplied with quotas from these SF's fell from 162 to 121 between 1987 and 1988. The amount of timber produced over this period was relatively constant.

There has been a substantial shift in the nature and location of the timber industry, particularly sawmilling operations over the last 20-30 years. New automated machinery and buyouts of smaller operations have seen numerous jobs lost.

Several authors have made suggestions for amendments to facilitate public participation. These are urgently needed for accountability to be achieved.

The Institute of Foresters of Australia recognise the importance of including public participation procedures in the preparation of comprehensive management plans for public forests yet this has not been adopted in NSW.

FCNSW is subsidized via the public purse by Commonwealth grants and various employment schemes, Treasury grants and loans through the N.S.W. Treasury.

FCNSW has operated at a substantial loss on its commercial forest operations in the past, and current profits are reportedly due to a change in accountancy methods rather than increased viability or efficiency.

The timber industry receives a massive subsidy, both directly and indirectly, from the public purse to log publicly owned forests on public lands.

Royalties do not accurately reflect the costs of production; nor do they include the cost of studying, understanding and replacing the forest ecosystems from which these products are produced; nor do they provide compensation for environmental and physical damage caused.

If royalties are raised to a more realistic level then this will be an incentive for private plantation establishment and assist in better management of both public & private forests.

So much has recently happened in the NSW community's awareness, in our understanding and appreciation of forests, that the crucial community discussion about the future of the timber industry and the FCNSW must commence from a very different perspective than it has in the past.

X NEFA is committed to a crucial discussion on the levels of timber-derived product consumption with a view to reducing consumer demand. We are not seeking to ban all timber derived products, since we recognise the desirability of utilizing natural materials in preference to artificial materials.

1. INTRODUCTION

The North East Forest Alliance

NEFA was formed in August, 1989 at a seminar held in Grafton. It is a network of pre-existing forest activists; individuals, groups and organisations concerned about forestry issues in the north east sector of NSW.

Its' area of interest is broadly defined as north of Sydney and in the eastern, and increasingly, the central divisions of NSW. It includes the northern coast, escarpment tablelands and, to a lesser extent, western slopes.

The network has a secretariat at 'The Big Scrub' Environment Centre Inc, in Lismore and numerous 'branch offices' in other environment centres, community centres and private homes. NEFA works through the regular general meetings and local group activity. Area Co-ordinators in the major northeastern regional centres are points of contact for networking information into and out of the area, and media spokespeople. All these people work as unpaid volunteers.

The focus of this submission

In addressing the terms of reference for this Inquiry NEFA has focussed on issues of accountability, effectiveness and efficiency, but has given special emphasis to several matters.

Underpinning this submission is the thesis, developed by the authors over many years experience and observation, that the Forestry Commission of NSW (FCNSW) is a historical anachronism.

NEFA believes FCNSW is economically non-viable and ecologically disastrous, and needs an urgent fundamental overhaul to construct a competent, modern, ecologically sustainable, independent, multidisciplinary, management agency for NSW commercial forests.

That overhaul must not be a simple revamping of the profitability of its commercial and economic operations, it must also be an indepth re-evaluation of:

- * FCNSW's priorities and procedures for management;
- * the adequacy and quality of information about forest eco-systems on which decisions are based;
- * the nature and degree of community awareness of and interest in public forests management;
- * the existing legislative provisions e.g. Forestry Act, 1916, Regulations, other NSW legislation which affect land under FCNSW management and FCNSW practices;
- * FCNSW's public role in education, information provision;
- * FCNSW's relationship to the forest products industry;
- * the uses to which public land are put.

Such a re-evaluation cannot be simply driven by 'economic rationalism' - anything for a (bigger) profit - it must be informed by the ecological imperative which is confronting natural resource owners and managers around the world.

This 'ecological imperative' holds that we must consider the other 99.9 per cent of creation, the whole ecosystem and its myriad interdependent life forms, in making decisions on resource use. We must recognise the knife edge of extinction on which so many species, forest associations, or ecosystems teeter.

We must be prepared to accommodate the legitimate rights of other species to continue to exist and evolve, even if that means the abandonment or modification of our human ambitions.

That same imperative indicates that as a society we must move away from being 'consumers' and become 'conservers'.

Further, we must urgently seek to truly achieve a sustainability, for our lifestyles and industries, which is credible in economic and ecological terms over many, many generations under the full range of climatic, social, political and economic conditions.

This is a formidable task indeed. The re-structuring of NSW forest management is an important, indeed crucial, first step towards achieving these objectives in NSW.

A re-evaluation at the depth indicated above, must result in major changes to the FCNSW.

The Public Accounts Committee has a unique opportunity to ensure that accountability, efficiency and effectiveness become hallmarks of NSW forest management by formulating recommendations to achieve these changes.

Further, the PAC ought to strive to ensure that these terms do not simply receive lip service but reflect ecological and environmental values as well as economic ones.

A failure to deliver what is required - recommendations and bi-partisan political will in action - will maintain the crisis now apparent, in the economy of the forest industry and in the forest ecosystems, and contribute to the inevitable failure of the FCNSW, the industry and the integrity of the forest environment.

While the bulk of the material contained in this submission applies directly to the north eastern areas of NSW, the authors believe that the issues raised and actions recommended here-in apply generally to the operations of the Forestry Commission of NSW throughout the whole of the state.

2. FOREST MANAGEMENT AND PROTECTION OF FOREST VALUES

North east New South Wales encompasses 5,393,000 hectares of forested land, of which 43% is on private lands, 47% is on State Forests or other Crown lands, and 10% is on National parks or other reserves. [1]

The Forestry Commission is thus responsible for the management of the majority of north east New South Wales' remaining forests.

Whilst the National Parks and Wildlife Service manages its' forests explicitly for the conservation and protection of forest values, National Parks and Nature Reserves do not include all the representative samples of species, forest associations or ecosystems needed to ensure the maintenance of genetic and biological diversity of indigenous flora and fauna and ecological processes.

Consequently there are still many species, associations and/or ecosystems, on private lands and within State Forests, which are not reserved and protected in perpetuity. An alarmingly high percentage of these at risk of degradation, fragmentation or extinction. [2] [3]

Private forests, even where they are known to have very significant environmental values, still have inadequate controls over them and where controls exist, have inadequate enforcement.

These forests are increasingly at risk of being cleared or degraded. e.g recent Antarctic Beech Nothofagus moorei rainforest logging in the habitat of the rare and endangered Rufous Scrub-bird at Allans Water near Ebor, on the north western edge of the New England National Park [4].

State Forests therefore play a very important role in the conservation of a range of forest values and the maintenance of ecosystems and species occurring in New South Wales.

It is imperative that State Forests be managed to ensure the retention of natural values, particularly to protect habitats and individuals of rare and endangered species. This has it not been done since the Forestry Act's passage in 1916! [5].

NEFA considers that not only is it necessary to establish an adequate reserve system, a goal yet to be achieved, it is important to manage all native forests primarily for wildlife to guarantee the maintenance of species diversity.

R.1 NEFA recommends, as a bare minimum, management for wildlife conservation and protection by FCNSW should include the retention and return of adequate numbers of hollow bearing trees and potential replacements throughout forests.

R.2 NEFA recommends a reduction in fire frequency to a more natural level.

R.3 NEFA recommends that management of State Forests should aim at preserving and restoring natural species composition and community structure of plants and animals throughout the forest estate.

R.4 NEFA recommends, that the acceptance of this role, managing to protect a range of forest values including wildlife conservation and protection, and its incorporation into legislation governing FCNSW are key components of the re-orientation of the FCNSW towards becoming a modern relevant government agency.

3. OTHER CROWN LANDS

In addition to State Forests, the Forestry Commission is responsible for managing forests on most Crown lands outside National Parks.

RESERVED LEASEHOLD LANDS : FCNSW OBJECTION BLOCKS CONVERSION

Under s.25E of the Forestry Act, 1916, the FCNSW has rights to forests on leasehold land the subject of applications for freeholding.

Under this provision, land with a statutory right to convert cannot be converted to freehold title until the FCNSW has been notified and has determined if it objects to the conversion being completed. Where it does object, the conversion to freehold is blocked and the FCNSW has 3 months after notification to make an expression of interest and a further 12 months to dedicate the land as State Forest or a Flora Reserve.

Some 2,096 leasehold properties still have this provision applying to them and a further 2,672 properties are affected by this provision and 'Reservations from Sale' under the Crown lands laws [6].

R.5 NEFA recommends that such an opportunity for blocking conversions and dedicating lands ought to be extended to the NPWS for the purposes of forest conservation and protection in National Parks and Nature Reserves.

R.6 Were this right extended to NPWS, NEFA recommends that the Service should have first 'pick' of the lands, since forest conservation is a higher priority use than timber production.

LEASEHOLD CONVERSIONS : 'PROFIT A PRENDRE'

Forest standing on leasehold land which has been converted to freehold title, because the FCNSW did not object or had no right to object, remains the property of the Crown for a period of ten years after conversion.

This forested land is known as Crown timber land and is subject to a policy known as 'profit a prendre,' written into Section 25F of the Forestry Act. Under s.25H the FCNSW is obliged "as far as practicable" to fully realize the Crown's assets by removing "the timber or products in one continuous operation" before the expiration of 10 years.

At present the only reasons for issuing a Certificate under s.25I of the Forestry Act to release land "from the burden of profit a prendre" are:

- * the timber or products have been substantially taken (s.25I (1)(a));
- * the timber or products are of a small quantity or inferior quality such that they would not be taken within 10 years (s.25I (1)(a1)); or
- * the FCNSW has sold the timber rights under s.25G (s.25I (1)(b)).

R.7 NEFA recommends that these provisions be fundamentally rethought and the Act amended to permit the retention of forests, and their release from profit a prendre for wildlife habitat, water quality maintenance, soil conservation and other purposes.

Crown leasehold lands have been converted to freehold land at an unprecedented rate in recent years and another major rush for conversion is now underway. The Department of Lands is prepared to lift from leasehold land Reservations from Sale which safeguarded natural values in the past [6].

Leasehold lands referenced by N.P.W.S. for acquisition and/or parts of identified Wilderness Areas have been converted to freehold. e.g. in Binghi, Guy Fawkes, Oxley Wild Rivers, and Deua nominated Wilderness areas. Some freeholded forests are being cleared and subdivided.

All these forests are now at risk of the 'full realisation' of their timber assets via maximum utilization logging, without regard to their role as assets for other purposes.

In those Management Areas where woodchipping is included as an approved activity, this 'realisation' can be devastating on natural values. Furthermore, if freeholded forests are to be managed for sustained native timber production, then a much lighter cutting would be more appropriate than ~~one off~~ 'timber mining' for maximum return to the Crown.

R.8 NEFA recommends a moratorium on the conversion to freehold of lands with high conservation values.

R.9 NEFA recommends the application of Conservation Agreements, under Section 69 of the National Parks and Wildlife Act, to freehold land of high conservation value as an alternative to 'profit a prendre' plunder.

OTHER LANDS

The Forestry Commission has acquired large tracts of Crown leasehold lands, due to s.25E, as well as purchasing some freehold properties, in recent years. Many Management Areas have also been concentrating their logging activities on to leasehold lands in recent years e.g. Casino West MA.

VACANT CROWN LAND DEDICATIONS

NEFA understands that the Forestry Commission has been instructed not to declare State Forests over areas of Vacant Crown land with high conservation values but pursues the dedication as State Forests of areas with substantial timber values.

The National Parks and Wildlife Service (NPWS) does not have a statutory right to dedications, it relies on political approval and is not able to acquire most such lands, thus there is no adequate mechanism for protecting such lands.

COMPETITION WITH THE NPWS

Historically, FCNSW is a much older player in forest management than NPWS, which was first constituted in the 1970's.

Though National Parks have been mainly dedicated over land with little or no value for timber production, the fact that the NPWS has since acquired some land which FCNSW had previously managed appears to have led to resentment on the Commission's behalf.

Where the transfer of these areas has been opposed by the FCNSW and/or the forest products industry, eg the Nightcap NP, hostility towards the Service has resulted.

That antagonism has grown with every suggestion that an area of forest be removed from timber production and added to the NPWS estate as a National Park or Nature Reserve, or managed under NPWS guidance as a Wilderness.

FCNSW actively opposes new National Park or Nature Reserve proposals as a matter of policy, thereby blocking their gazettal. The Minister for Natural Resource Mr Ian Causley personally opposes the removal of any additional areas of forest from State Forest for National Parks [7].

The process for resolving conflicts over land use, whether a forest should become a National Park, is not apparent and it would appear that there is no ecological analysis, only political strong-arming in the Cabinet's consideration. Very often trade-offs of areas are sought with no consideration of the ecological boundaries which exist.

R.10 NEFA recommends that a process for resolving these conflicts along ecological principles be devised and operated.

Old growth forests on more fertile soils and moderate topography (slope) are poorly represented in the National Parks reserve system [3] and the few remaining stands outside the Parks represent the major large sawlog resource.

Consequently, the FCNSW now is directly competing with the NPWS for use of land, by attempting to develop and exploit the timber resources of forests, while the NPWS endeavours to find the necessary resources to assess these forests for a range of natural values, including wilderness quality, their suitability for protection within NPWS reserves, and to acquire these lands.

The FCNSW, with the urging of the industry, appears to have closed its eyes to forest values other than timber and is seeking to retain forests within its estate by removing or damaging values which, if documented, may lead to the areas dedication under the NPW Act or Wilderness Act.

For example, road construction and logging are currently underway in the nominated Washpool, Bindery (Mann) and Guy Fawkes wilderness areas, which require NPWS assessment within two years of their nomination.

Action of this nature by FCNSW demonstrates its unwillingness to accept the fact that other legislation in NSW, primarily the Environmental Planning and Assessment Act, 1979 [8], National Parks and Wildlife Act, 1974 [9] and the Wilderness Act [10], may legitimately alter the tenure of land for the purposes of the protection of forests and associated values.

It is not unlikely that the FCNSW feels insecure and inclined towards rivalry, and is staking its claims before these NPWS assessments can be completed. Such competition among NSW government agencies is inefficient, and leads to ineffectiveness in their central roles.

More significantly however, such competition results in the loss or damaging of important ecosystems and/or the local extinction of species which, had they been closely studied, may have been shown as needing reservation and protection under the Wilderness or NPW Acts.

The actual consequences of a range of FCNSW operations for forest ecosystems are described below.



Tiger Cat

4. ADEQUACY OF CURRENT RESERVES

In north eastern New South Wales in 1986, 3,083,000 hectares (57%) of forests were on Crown lands. Of these forests 17% were on National Parks and Nature Reserves, 48% on State Forests, and 35% on other Crown lands.[1]

Since then large areas of other Crown lands have either been incorporated into State Forests or converted to freehold.

80% of the state's rainforest and 90% of tall open forest have already been cleared or degraded [3 p.17]. The remaining undisturbed forests which are outside National Parks and Nature Reserves will mostly be destroyed or seriously modified within the next 10-15 years.

Forestry operations pose a threat to all or part of more than half the forested wilderness areas in eastern NSW.

54 distinct forest types are considered by the National Parks and Wildlife Service to be inadequately protected under the existing system of reserves.[3 p.19-20]

20 species of birds and 19 species of mammals which depend on the tree hollows characteristic of undisturbed forest are likely to be adversely affected by logging in the eucalypt forests in eastern NSW.[3 App 2]

Scientists have concluded that there will inevitably be extinctions of native species should forestry operations continue as planned in the state's south-east. [3] NEFA believes that the possibilities for extinctions in the north east of the state are equal to or exceed the likelihood of extinctions in the south east.

Given that in the order of 50% of north east New South Wales' forests have been cleared since European settlement, NEFA estimates that only some 5% of the original forest cover is currently reserved and protected.

NATIONAL PARKS AND NATURE RESERVES

Historically, the majority of National Parks have been declared over forests of low productivity on poor soils and steep slopes. While the NPWS gained some of more productive forests as a consequence of the rainforest decision of 1982, the majority of these forests had already been logged or were on slopes too steep to log.

The NPWS has concluded that "the reservation of forests growing on moderate to high nutrient soils in NSW is inadequate".[3 p.16]

These facts belie the often quoted claim that the National Parks are full of productive forests which have been 'locked up'.

It is worth noting, furthermore, that the recent Report of the New South Wales Pulp and Paper Industry Taskforce [1], on which the FCNSW was represented, erroneously concluded that

"the recent period of National Park acquisition has resulted in a balance of reserved areas" [1 p.37].

The Report bemoaned the fact that "the area of State Forests has been reduced by some 205,000 hectares since 1968 in favour of National Park and Nature Reserve dedications" while completely ignoring increases to the State Forest system in the 10 years to 1988 totalling 328,000 hectares - an increase of 9.1% of total State Forest area.

The actual area of productive forests 'locked up' in Reserves is tiny and is only significant because mismanagement by FCNSW has made large sawlogs a scarce and disappearing resource.

The analysis by NPWS, that the present reserve system is obviously incomplete with large percentages of forest associations, plants and animals (including many that are rare or endangered) inadequately, poorly, or not represented in reserves is supported by other authoritative writers including Benson [2] and Recher and Lim [11].

This is a matter of serious dimensions, which requires urgent attention.

FLORA AND FOREST RESERVES

The Forestry Commission's reserve system is comprised of Flora Reserves, Forest Preserves, and special emphasis areas marked on Preferred Management Priority maps.

Flora Reserves are supposed to protect important forest areas as 'gene reservoirs', as examples of forest types, and as reference areas for comparison with logged and burnt forests.

They have often been declared over steep unloggable forests and are of generally small size, with the average size being 256 ha. and the median size 100ha. [12] In July 89 there were 142 Floras Reserves totalling 38,200 ha. [13]

Some have been declared for scenic or recreational reasons, and are now being developed for tourism e.g. Cambridge Plateau FR, Mallanganee FR, Murray Scrub FR. Some Flora Reserves encompass significant areas of logged forest e.g. Acacia Plateau FR, Mt Clunie FR, Captains Creek FR and Tooloom Scrub FR.

While NEFA considers the FCNSW's Flora Reserve system to be very important for nature conservation, the size of reserves, limited representativeness, and inadequate management render them similarly inadequate to meet the conservation requirements of State Forests.

The Preferred Management Priority (PMP) system, as practiced, provides very little protection to the range of forest values needing conservation and does not substantially contribute to the reserve system.

R.11 NEFA recommends all areas currently within Flora Reserves or Forest Preserves should be removed from the control and management of the FCNSW, dedicated as Nature Reserves under the NPW Act. Major increases in funding must be made to NPWS to permit their appropriate management by the Service.

FURTHER AREAS NEED PROTECTION AND WITHDRAWAL FROM TIMBER PRODUCTION

All forests of high conservation value, particularly rainforests, 'old growth' forests, and unrepresented and inadequately represented species, associations or ecosystems, are of primary concern to NEFA.

NEFA considers that Reserves should encompass all native vegetation of high conservation significance, irrespective of current land tenure, including but not restricted to:

- * all rainforests (as ecologically defined), 'old growth' forests and woodlands, and wilderness areas;
- * all habitats of rare and endangered species;
- * large representative samples of all natural land systems, plant associations and faunal communities within each bio-region;
- * Viable populations of all native species, throughout their natural ranges, including all optimal and critical habitat for sensitive species;
- * all forests and woodlands which constitute inholdings in, strategic buffers for, or necessary links between areas of high conservation significance; and
- * all forest and woodland areas of notable cultural significance or aesthetic values.

However, the unlogged and lightly selectively logged 'old growth' forests on good soils and moderate slopes have recently received priority by NEFA because of their limited number, diminishing area, their significance to rare and endangered species [14] [15] and the imminent threats to them from roadworks, logging and burning.

NEFA estimates that probably less than 5% of north east New South Wales eucalypt forests on better soils and moderate slopes (less than 30 degrees) remain as old growth. The few remaining stands of old growth forest are important habitat for many forest dependent species [16][17][18][19][20]. These are the least protected forests and the most threatened.

Old growth forests are anticipated to provide the major large sawlog resource in a number of Management Areas until the end of their present cutting cycles.

R.12 NEFA recommends that logging and other damaging activities are excluded from all old growth forests while they are under comprehensive evaluation, to ascertain their suitability for dedication to the NPWS. Naturally this will have ramifications on the sawlog resources of a number of Management Areas.

It must be recognised, however, that the addition of all major areas of 'old growth' forests to the National Parks estate would still not ensure an adequate fully representative reserve system.

Additional areas, in some cases including previously logged forests, will need to be withdrawn from timber production if a comprehensive and adequate system is to be established and, more importantly, maintained.

R.13 NEFA recommends that additional areas be withdrawn from timber production to allow a comprehensive and adequate reserve system is to be established and maintained.

Numerous other species and substantial additional areas of non-forest communities would be required to satisfy the requirements of a comprehensive system of reserves.

Any future reserve system which aims to be comprehensive, must recognise the importance that likely climate changes will have on species populations' distribution. Consequently, NEFA believes that to be adequately conserved within NPWS reserves:

- (i) Such Reserves must encompass numerous extensive core areas, wilderness areas, and be linked by effective corridors to permit migration.
- (ii) Species must be represented across their full range of distribution: viz, north/south, east/west and elevation.

R.14 NEFA recommends that species be represented in NPWS reserves across their full range of distribution, with populations maintained at sufficient levels to allow for continued evolution in the wild.

The exact areas or boundaries of areas required for removal from timber production are available for only a limited number of forests which are the subject of reserve proposals by conservation groups or Reference Statements by the NPWS. These are the priority areas on which action for protection can and should proceed immediately.

R.15 NEFA recommends a moratorium on any detrimental activities, or adverse changes in land tenure, in any areas already nominated for Reserve status or identified as having high conservation significance while comprehensive surveys and assessments are undertaken.

R.16 NEFA recommends immediate action be taken to gazette National Parks over lands the subject of Reference Statements by the NPWS.

An exhaustive schedule of areas which should be removed from timber production and secured in reserves and accurate proposals for their boundaries cannot be provided at present largely because, still, no NSW government agency has properly investigated the non-timber forest values of SF's, documented them and released this information into the public domain.

R.17 NEFA recommends a complete and thorough investigation of forest values and the public release of resultant information of these values, be pursued as an urgent priority, by independent researchers funded by the NSW Government.

In Victoria when the government there recognised the need to know what it was managing, it commissioned the Land Conservation Council of Victoria, (a government agency not a bogus environment body) to prepare and exhibit very detailed inventories of the natural resources of the state.

Only when these steps have been completed in NSW and funding provided for the evaluation of areas' significance can the NPWS or groups such as NEFA begin to make definitive statements about areas which ought to be included in the NPWS reserve system.

R.18 NEFA recommends that the results of these surveys be utilised in the design of an adequate and comprehensive Reserve system capable of allowing for predicted future climatic changes.

R.19 NEFA recommends an immediate review be carried out by independent consultants on the impact that the establishment of an adequate Reserve system will have on the NSW timber resources and timber industry.

PERVERSE DEFINITION OF RAINFOREST ALLOWS CONTINUED LOGGING

Particular mention needs to be made of the Commission's approach to the logging and its perverse definition of what constitutes 'rainforest'.

There is an overwhelming public recognition of the need for an end to rainforest logging, first demonstrated in the early 80's and even more evident in the 1990's [21], which eight years after the phase out of rainforest logging was announced, still is not adequately reflected in the Commission's operations.

The Commission defines rainforest as follows:

"A closed, moisture-loving community of trees, usually containing one or more subordinate stories of trees and shrubs; frequently mixed in composition; the species typically, but not invariably, broadleaved and evergreen; heavy vines (lianes), often present and sometimes abundant; eucalypts typically absent except as relics of an earlier community." [22]

Most Management Areas, in north-east NSW, contain large areas of rainforest. NEFA estimates that 60% of the State's rainforests, including Brush Box forests, are still under the control of the Forestry Commission and rainforest timbers continue to be extracted.

Even using the FCNSW's perverse, restrictive definition of rainforest, the Commission continues to permit rainforest logging with 50% canopy retention in northeastern NSW. These priceless rainforest trees are used to manufacture formboard - a wood product which is often used once in concrete pours and then discarded.

Roads are still being pushed through virgin rainforest stands to gain access to Brush box and eucalypts. NEFA understands that all the accessible rainforests under FCNSW control, outside of Flora Reserves, are gazetted for 'speciality purpose' logging.

Further, logging up to the boundary of distinct rainforest patches removes the buffer affect provided by associated forest types and exposes the vulnerable rainforests to degradation, particularly by fire. The survival of many small stands is being directly jeopardised by such inappropriate management.

Furthermore, there is an additional problem in that, despite scientific evidence of its particular ecological requirements [23], FCNSW fails to regard Brush Box (*Lophostemon confertus*) as a species of both climax and earlier successional stage (secondary) rainforest.

The presence of various commercial Eucalyptus species, growing in association with forest which would otherwise be considered rainforest, on both floristic and structural grounds, is similarly regarded by the Commission as 'moist hardwood forest', available to be logged.

In practice rainforest logging is still continuing in New South Wales. It continues by virtue of the fact that the Commission eliminates, by definitional myopia, the vast majority of rainforests which also contain commercial Brush box and eucalypts from its recognised rainforest areas.

The Report of the Working Group on Rainforest Conservation [24] prepared for the Commonwealth, provides valuable evidence that much moist hardwood forest, termed "transition forest" by the Working Group, has a significant ecological affinity with pure rainforest:

"Transition forest has special conservation value by virtue of its position at the interface between sclerophyll and true rainforest. Further there is the view that much transition forest has the same important biological and aesthetic values as rainforest" [24, p20-21].

A review of this report by 14 scientists of the Australian National University's Centre for Resource & Environmental Studies [25] provides further evidence of the currently

inadequate state of rainforest protection in NSW.

This evidence included the following:

"Our review is unable to find any logical argument for maintaining the disparate use of parochial terms and the widely differing interpretation among States and within their Departments as to what constitutes rainforest."
[25, p28]

"The hard fact is that there is no simple, universal definition for rainforest in all its highly variable forms". [25, p28]

"...all the components of rainforest ecosystem processes are not restricted to, or entirely dependent upon discrete rainforest patches; rather, the survival of many depends upon access to a temporal and spatial mosaic of rainforest and non-rainforest. Within such mosaics, areas without rainforest cover in the present day may have been rainforested in the past. In developing a balanced conservational plan, it is therefore important to understand that as environmental gradients change in time and space, so do the organisms associated with definable geographic locations along these gradients. Thus environmental ranges that are important to the survival of so-called rainforest animals, and which extend into the surrounding vegetational mosaic are critical to the definition of habitat." [25, p31]

"The most elementary ecological arguments and the most superficial ecological and biological data suggest it is meaningless to assume the presence or absence of eucalypts or acacias in an otherwise 'rainforest' matrix should be a deciding factor on what is essentially a problem of ecosystem definition along multiple gradients." [25, p32]

"It follows that from an ecological viewpoint, the 'transition' forests...must be included in any balanced conservational approach. In this regard there are obvious consequences for commercial interests that seek to exclude 'transition' forests from rainforest, but this is untenable on conservational grounds." [25, p33].

More recently, one of Australia's foremost rainforest ecologists, Professor Len Webb, stated publicly that defining rainforest in this way, and of logging, burning and otherwise degrading the transitional stages will inevitably result in the extinction of the climax form from areas where these activities are practiced [26].

The above points clearly illustrates the inadequacy of the FCNSW's definition, highlighting the fact that the conservation of rainforest in NSW is far from adequate, despite the general intent of the 1982 NSW Rainforest Policy and subsequent World Heritage recognition of National Parks and Nature Reserves under that policy.

There remains unprotected in NSW areas of rainforest which, if defined ecologically rather than commercially, would doubtless be accepted as part of the NSW Rainforests World Heritage area.

NEFA accepts the CRES argument and the classification by the Ecological Society of Australia of Brush Box as a rainforest species and agrees that rainforest can have eucalypt dominants.

NEFA is opposed to any form of rainforest logging and is actively pursuing the removal of all rainforests from timber production and their preservation in secure reserves.

Roading and logging is not considered by NEFA to be an acceptable use of a publicly owned rainforest and should cease immediately.

Similarly, NEFA believes that further degradation of our few remaining Wilderness Areas should not be allowed to continue. We are seeking to have areas nominated for Wilderness dedication removed from timber production and other modifying activities while these areas are assessed by the NPWS.

R.20 NEFA recommends the FCNSW adopt the classification by the Ecological Society of Australia of Brush Box as a rainforest species and that forest type maps be prepared for all forest areas based on ecological, and not commercial, parameters.

R.21 NEFA recommends an immediate end to any form of rainforest logging through the removal of all rainforests from timber production and their preservation in secure reserves.

R.22 NEFA recommends that further degradation of the few remaining Wilderness Areas and areas nominated for Wilderness dedication be excluded from timber production and other modifying activities while these areas are assessed by the NPWS.

5. FCNSW STRUCTURE NOT ACCOUNTABLE OR EFFECTIVE

NEFA asserts that the FCNSW structure and operations are inappropriate for a public authority, managing a public resource in the public interest.

INFORMATION NOT RECORDED

While FCNSW has established a number of trial plantations of native species, follow up work on these areas is often not done or the information not collated.

R.23 NEFA recommends that research work on trial plantations be collated and/or carried out and the information released to the public.

Following inspections made by the authors under Freedom of Information (FoI) requests it is apparent that some Management Areas (e.g. Tenterfield) do not even have adequate records of logging history, past or present.

R.24 NEFA recommends that all Management Areas be required to make and maintain adequate records of logging and fire history.

Few Management Areas make real attempts to keep adequate records of fauna observed and apparently no Management Areas undertake exhaustive investigations of the fauna of the forests under management e.g. Dorrig MA, Urbenville MA etc.

Scientific information on the impacts of logging and even court judgements are rarely reviewed and/or incorporated into management strategies.

INFORMATION NOT PUBLISHED

Not-with-standing the paucity of resource information, the limited information which does exist, relevant to the management of the NSW's State Forests, is not routinely released into the public domain.

This information is regularly withheld even where that information has been provided by other publicly funded agencies such as the CSIRO.

Inquiries by members of NEFA have often been hampered by an unwillingness by FCNSW staff to answer questions or permit access to information on state forests, provoking a series of Freedom of Information requests by NEFA.

These attitudes and actions are not considered acceptable by NEFA for a public resource management agency and is indicative of the hostility which FCNSW staff have for members of the public inquiring into their 'bailiwick'.

Given that there is almost no other form of public accountability, the unwillingness to release or provide access to information, is especially inappropriate.

R.25 NEFA recommends that FCNSW release information on state forests into the public domain.

Under Clause 11 of the Forestry Regulation, 1983, [27] the FCNSW is required to keep copies of approved management plans or working plans for flora reserves at the District and Regional Offices and at its head office.

It says that these plans

"shall be available for inspection by the public at those offices during the normal business hours of the Commission".

It has been the experience of the authors that at various times these documents are not available. The FCNSW November 1989 catalogue of publications [28] lists 5 Management Plans of 1988 as 'Not yet available'.

An attempt at inspection in July 1990 by one of the authors revealed that two of these were not available.

Apart from being a breach of their own Regulations, such a situation has serious implications for FCNSW's accountability, effectiveness and efficiency. It is clear that little priority is given by FCNSW to allowing public access to its management documents.

LIMITED PERSPECTIVE DIRECTS MANAGEMENT : TIMBER PRODUCTION

Under the objects of the Forestry Act 1916, Section 8A, FCNSW's primary aim is to manage state forests for timber production for a range of uses.

X In pursuing this object, FCNSW often compromises other objects, e.g. water catchment capabilities preservation and improvement (s.8A.(1)(c)), recreation (s.8A.(1)(e)(i)), and wildlife conservation - only birds and animals (s.8A.(1)(e)(ii)); which are explicitly expressed within the Act.

That these broader objects are included at all is useful. That the pursuit of them is made subservient to timber production is of concern.

NEFA believes that the management of state forests should provide for the conservation of wildlife as a pre-eminent consideration.

The continued operation of the FCNSW under these archaic provisions and priorities ignores the realities of the endangering and extinction which many species, associations or ecological processes face in the relentless pursuit of timber production.

In their paper, Ben Boer and Brian Preston, [29] propose specific recommended amendments to the Forestry Act 1916 including a number which focus directly on modernising the objects of the Act to recognise the importance of wildlife conservation to accord with developments in ecological philosophy.

R.26 NEFA recommends that the Forestry Act's objects be reviewed and modernised in line with Boer and Prestons' suggestions.

Many of these recommended amendments are endorsed by NEFA. Boer and Preston's paper ought to be closely examined by the Public Accounts Committee in its Inquiry and all of their recommendations warrant review.

NEED FOR MULTIDISCIPLINARY BOARD OF COMMISSIONERS

Under the current structure, the FCNSW is directed by a Commissioner and two assistant commissioners. They are senior public servants with long standing within the FCNSW, and all are foresters trained to produce timber.

Because of the dominance of timber production as the principal forest values for management the only people who have input into policy or decision making appears to be those who have a structural interest in timber production.

This structure is considered undesirable by NEFA since there is no advocate of non-timber forest values within the FCNSW.

That these other forest values are public interest issues [20], and not adequately considered by the public authority charged with managing these public resources, forests, in the public interest is of serious concern.

This structure means that the FCNSW senior management is unaccountable to significant matters of public interest.

Coupled to this, there is a centralising of information and decision making within the Head Office in Sydney which does not promote accountability at District and Regional level. The removal of the FCNSW offices to Pennant Hills in late 1990 does not augur well for improved accountability.

The re-constitution of the Forestry Commission is proposed in order to achieve greater accountability and improve FCNSW's effectiveness in recognising and managing for all forest values - ecological and economic.

A larger, 9 person, multi-disciplinary body of Commissioners with broad representation from NSW government, community, industry and academic groups, appointed as part-time Commissioners has been proposed by Boer and Preston.

In NEFA's view, these appointees must have demonstrable ecological expertise amongst other desirable qualities.

R.27 NEFA recommends that FCNSW be reconstituted and a larger multi-disciplinary Board of Commissioners with ecological expertise be appointed.

INTERNAL COMMITTEE STRUCTURE INADEQUATE AND UNACCOUNTABLE

An appraisal of Appendix 5 to the 1988-89 Annual Reports [13] reveals that the range of extant internal committees of the FCNSW does not embrace a range of crucial matters.

Scientific research, environmental investigation and impact assessment are not the subject of any committee's attention.

A legal committee to monitor and enforce compliance with the provisions of the Forestry Act and other Acts affecting FCNSW does not exist.

Despite the existence of a Softwood Plantation Task Force, no staff work on a Task Force focussed on native hardwood species.

Apparently, no Policy Review Committee exists to review and update existing policies or formulate new ones. The Indigenous Forest Policy, 1976 [30] and the Exotic Softwood Plantation Policy, 1982 [31] are in 1990, 14 and 8 years old respectively.

Who reviews these policies or drafts other policies, as new issues emerge e.g. Greenhouse Effect, in the absence of a Policy Development Committee?

Could it be that there has been no policy review or development in recent years? If this is the case this is a serious example of the FCNSW's lack of (internal) accountability and effectiveness.

R.28 NEFA recommends that internal FCNSW committees be immediately established and appropriately funded to: review scientific research, environmental investigation and impact assessment, monitor and enforce compliance with the provisions of the Forestry Act and other Acts, research and develop native hardwood species plantations, review and update the Indigenous Forest Policy, 1976 and the Exotic Softwood Plantation Policy, 1982, and formulate new policies as appropriate.

The workings of the committees which do exist is not explained in any detail and the existence of a Spokeswomen Committee remains a mystery to the authors. Who are they? What do they do?

To achieve accountability,

R.29 NEFA recommends that these existing and proposed committees should provide copies of their terms of reference and summary reports of their activities within the body of the Annual Report.

FOREST CLOSURES PREVENT ACCOUNTABILITY

Under Clauses 17, 18 and 19 of the Forestry Regulation, 1983, [27] the FCNSW can close areas of State Forest for a variety of purposes and prohibit or restrict entry.

While there may be good grounds for the Commission to possess and exercise such powers, the application of these powers has tended to be used to limit the public accountability of the FCNSW.

On numerous occasions, in the north east forests and the south east forests the Commission has used these powers to prevent members of the public from inspecting what work is underway in a forest to ensure that other NSW and Commonwealth laws, Standard Erosion Mitigation Conditions, Management and Harvesting Plans etc. are being complied with.

As one example, in early March, 1990, FCNSW used its powers to close the forest in an attempt to prevent members of NEFA from enforcing the requirements of ss.111 and 112 of the EPA Act. It requested and received assistance from the Police Department who, acting on instructions, arrested 13 people over the two days 12th and 13th March, including one of the authors.

These people were charged with the criminal offence of Trespass and removed from the forest.

FCNSW subsequently admitted in the Land and Environment Court before Justice Cripps, that they had not prepared or considered an EIS for the work it was carrying out in the forest, despite the fact that it was aware that an EIS was required.

NEFA alleges that the closure of Chaelundi SF was an unlawful act since ~~it was done for the purposes of preventing the~~ discovery and apprehension of the FCNSW's illegal road construction and logging work.

Another author was arrested in the Bellangry SF, while attempting to speak to members of the media. The forest lookout and picnic area had been closed by the FCNSW for a barbeque with the Premier, Mr Greiner, and to ensure a media blanket on the assembled media corps.

NEFA alleges that this closure was unlawful since the forest closure was not done to maintain public safety but was done, cynically, to prevent members of the public from exercising their right of free speech, in commenting on the Premiers announcement to the assembled media.

The closure of the forest, the denial of access to a public picnic area, and the arrest and charging of a person with a direct and tangible interests in the Premier's announcement was not in the public interest.

The use of these powers, unlawfully, and the actions of the NSW Police were a blatant case of political censorship. The FCNSW and Police should not be used as political tools since their duties ought to be exercised in the public interest and at all times impartially.

Upon answering bail, the charges laid in this matter were discontinued but other charges were said to be substituted. At the time of writing FCNSW has not nominated what charges it intends to pursue in the Local Court. This tardiness is probably due to the FCNSW's inability to identify any unlawful activity upon which charges can be based.

This ability to close public land and prefer criminal charges against members of the public has been grossly abused by the Commission on numerous occasions and if not properly regulated will continue to be abused.

R.30 NEFA recommends that FCNSW should not make decisions to close a forest on political grounds, to permit illegal activities by the FCNSW or its licencees or to prevent the appropriate public scrutiny of a public authority administering public lands in the public interest.

The dangerous lack of accountability which the operation of such powers confers must be a matter for careful consideration by the Public Accounts Committee.

R.31 NEFA recommends that where a forest closure is necessary for reasons of safety:

- * a Public Notice should be inserted in a newspaper circulating within the District, advising of the area, period and reason for closure. Such a Notice should be accompanied by an adequate map and be signed by an authorised FCNSW staff member.
- * a Notice capable of being read from the public road should be installed at the intersection of roads which lead to the area of forest closed. That Notice should contain the information described above.

One crucial issue arising from forest closures, which NEFA directs the attention of the Public Accounts Committee towards discovering, is the cost of police protection for controversial or illegal operations by the FCNSW.

What has been the cost of requiring police presence in NSW forests over the last three financial years? Does the FCNSW pay for this police presence, as would the organisers of a football game or motor bike race? Are these costs included in the costs for the production and recovery of timber when royalties are being calculated? If not, why are they not included?

These costs are also avoidable since the compliance with NSW laws and undertaking adequate environmental assessment would obviate the need for public intervention into State Forests and the operations of the FCNSW.

The pursuit of controversial policies and actions, such as those being pursued in the south east and north east forests, (logging and roading in habitat of endangered species, in National Estate areas, and in nominated Wilderness areas) in the face of reasoned, independently scientifically validated concerns, provokes predictable confrontation and generates cost and pain that could have been avoided had FCNSW been reasonable and acted in the public's interests.

R.32 NEFA recommends that FCNSW avoid excessive costs for police protection by abandoning controversial policies and actions which are not consistent with reasoned, independently scientifically validated opinion.

Despite this unprecedented level of resource availability, the number of sawmills supplied with quotas from these SF's fell from 162 to 121 over the same period [61]. The fact that the amount of timber produced over this period was relatively constant suggests that there are some things seriously wrong with the overall operation of the industry.

In fact, there has been a substantial shift in the nature and location of the timber industry, particularly sawmilling operations over the last 20-30 years.

The advent of new highly automated machinery and the buyouts of smaller sawmilling operations by large regional and multinational companies has seen numerous jobs lost.

The interest of remote boardroom executives in the welfare of communities dependent on timber industry jobs, was shown in the Adelaide Steamship Co decision to close the Grevillea mill near Kyogle, to be very limited indeed.

Furthermore, many milling operations are now highly centralised in major centres and are very heavily dependent on long distance road haulage to bring the resource to the mill. This is in contrast to earlier periods of milling when smaller local mills would recover timber from within a much smaller 'working circle'.

NEFA analysis of FCNSW documents indicates that current forestry planning will see nearly all accessible but undisturbed SF areas degraded within the next 10-15 years. In some Management Areas it will be sooner. Sufficient regrowth forests to supply large sawlogs are unlikely to be available to maintain sawlog production until well into the future.

This massive shortfall in large sawlog resource availability is perhaps the most telling indication of the FCNSW's lack of supervision and intervention in decades of gross overcutting and its lack of effectiveness and efficiency in resource management and planning.

The hiatus which this shortfall will produce will produce a statewide decline in the sawlog industry and in the timber industry generally. While there have been plenty of scaremongering claims made in the press and requests for massive compensation pay-outs, the likely consequences of this decline, socially and economically have yet to adequately evaluated.

R.53 NEFA recommends that, if the industry is to survive this hiatus and emerge as an appropriate and efficient industry in the 21st century, major changes and restructuring will be required.

What is most disturbing however, is that most of the work being done to identify alternative resources, transitional arrangements and long term strategies for moving towards a plantation based timber production, is being done by the environment movement, particularly the Australian Conservation Foundation and The Wilderness Society.

NEFA believes that the FCNSW's cosy relationship with the industry is an impediment to the unbiased and impartial exercise of its responsibilities, in enforcing the laws of NSW and the Commissions policies such as 'sustained yield'. Its inefficiency in these areas is demonstrable & regrettable.

It appears that it is the large companies with Crown allocations which primarily influence FCNSW. Many smaller privately owned mills are unhappy about various aspects of forest management and resource allocation, but because of the power of the FCNSW they are unwilling to put their concerns on the public record, in case such disclosures affect their timber allocations.

The PAC ought to sub-poena some of these smaller companies and inquire into their attitudes and concerns regarding the operation of FCNSW and the influence of the larger companies.

R.52 NEFA recommends that the Public Accounts Committee enquire into FCNSW's relationship with the timber industry, seek ways of increasing the Commission independence and recommend ways for the Commission to distance itself from the industry it regulates.

PLANNING TO RESTRUCTURE THE TIMBER INDUSTRY IS NEEDED - NOW!

On a first consideration, the future of the timber industry may appear beyond the scope of the Public Accounts Committee's Terms of Reference for the Inquiry.

Yet NEFA believes that an effective and efficient FCNSW would not have produced a crisis in sawlog supplies which would provoke the need for major industry restructuring. Were the industry and the community to require changes in the timber industry operations a FCNSW competent to consider and actively plan for industry changes is required.

NEFA believes that it would be instructive for the PAC to consider the implications of industry restructuring on the FCNSW.

To that end, and to inform members of the Committee of the attitude of NEFA towards the industry's future, the following remarks are provided.

There have been frequent protests that the dedication of new National Parks and Nature Reserves has significantly reduced the industry's resource base and is now threatening to destroy the industry.

This is despite the fact that in 1982 outside consultants Fortech P/L provided information about alternative resources for sawlogging which would meet the industry's demand.

Further, as reported above, the area of State Forest in NSW has not declined but increased by nearly 10% to 3.6 million hectares in the 10 years to 1988.[1]

12. FCNSW RELATIONSHIP WITH THE TIMBER INDUSTRY

From the outside, the relationship of FCNSW to the NSW timber industry appears to be very cosy indeed. Far from being an 'arms length' public authority regulating vested interests, FCNSW has all the indicators of being a 'captured bureaucracy'.

In NEFA's estimation FCNSW is attendant to the interests and needs of the industry above and beyond what is healthy and desirable for the proper discharge of its duties.

It is the view of the authors that on many occasions, such as the forest closure at Chaelundi SF, the FCNSW puts the industry's interest ahead of the public interest and is very defensive of the industry's ability to maximise profits.

Certainly there are numerous examples of the FCNSW being extremely tolerant of abuses of the Standard Soil Erosion Mitigation Conditions, Harvesting Plans etc by industry workers while being overtly hostile to members of the public concerned about protecting and properly managing NSW forest for a range of forest values.

The unwillingness by FCNSW over several years, to rapidly reduce sawlog quotas to sustainable yield levels, appears to be an excellent illustration of this cosy relationship and the FCNSW's devotion to industry profits.

The historical abuses of quotas, gross overcutting of forests by the industry, consistent breaches of the SEMC apparently unsupervised by FCNSW in the 50's 60's and 70's [55] would also point to the FCNSW's accommodation of the industry's interests as a top priority and the Commission's ineffectiveness and/or unwillingness to ensure professional independent standards of management.

In NEFA's estimation the situation has not markedly changed since Dr Gentle made his historic Opening Address to Senior Officers' Conference in 1981.

The incredibly cheap and unprofitable pricing policies of the Commission which persisted until very recently, when it was put under serious pressure to become profitable, also points starkly towards a public authority which has been orientated towards the vested interests of the industry.

It also appears that apparent increased profitability of FCNSW is due to a change in accountancy methods and not more efficient or profitable management.

The advocacy by Commission staff for the now flawed Greenhouse Effect solution through logging of old growth forests; their support for the proposal for the Clarence chemical pulp mill; their erroneous and misleading statements on the extent of 'old growth' forests; and their continuing generation of propaganda and misinformation regarding the 1982 rainforest decision; marks the FCNSW as an open advocate of the industry's desire for access and profitability, not an independent regulator.

11. PLANTATIONS, PLANTINGS AND NURSERIES

According to a number of reports there are already more than sufficient pine plantations established to satisfy our future needs [59]. Yet the Forestry Commission is still intent on clearing native forests for pine plantations.

A number of plantations have been burnt out, established on unsuitable sites and/or severely affected by fungus disease or insect attack. Exotic pines are detrimental to soils and native flora and fauna. They also have been noted to be invasive of native vegetation [60].

NEFA favours the establishment, on already cleared private lands, of mixed plantations of native species and races naturally found in the vicinity of the site.

R.51 NEFA recommends that the Forestry Commission should immediately cease the clearance of native vegetation for plantation establishment, restrict exotic pine plantings to already established pine plantation areas, and instigate mixed native species plantations.

NURSERY OPERATIONS

Through their nurseries and practices the Forestry Commission has participated in:

- * the spread of exotic plants, a number of which have proved to be weed species and invasive of natural vegetation (e.g. Camphor Laurel);
- * the spread of native species outside their known ranges, a number of which have similarly invaded local vegetation; and
- * interfering with native gene pools by distributing genetic variants of species for planting in the domain of different variants of the same species.

The Forestry Commission undertakes plantings of native species on some logging dumps and roads, in some areas where regeneration fails, and in some clear-felled forests. Such plantings are usually only of a single species, often not originally found on the site.

In total, a large area of rainforest on the North Coast has been clearfelled, burnt and converted to such plantations.

Through their Timber Stand Improvement program they may also ringbark and/or poison any undesirable species on a site. Large areas of north coast forests have been treated in this manner, with FCNSW only constrained in this forest destruction by available finances.

NEFA considers that native forests should be managed to maintain their natural species composition and genetic variability.

R.47 NEFA recommends that the Public Accounts Committee closely investigate the practice of selling timber resources capable of higher value uses for a low value product.

Export woodchipping operations are having an immense environmental impact and yet are of minimal, if any economic value to the community. It is therefore considered by NEFA to be a wasteful abuse of a community resource.

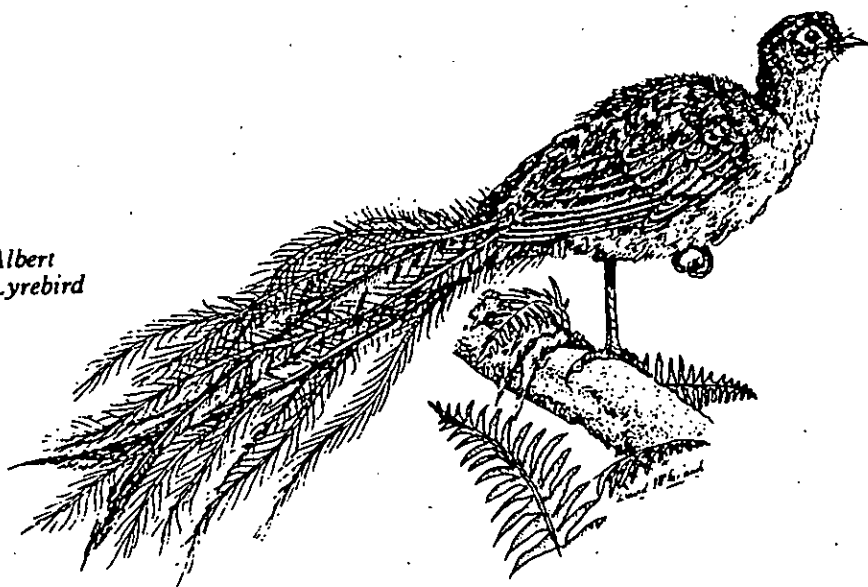
R.46 NEFA recommends that all NSW forest products be processed to the maximum possible value provided that the processing is consistent with adequate environmental protection standards.

X or NEFA is opposed to the procurement of 'pulpwood' from Crown private lands for export.

R.49 NEFA recommends that encouragement should be given to high employment generating and low resource demanding industries.

R.50 NEFA recommends a complete reassessment of the uses-current and potential - of small timber, increased research into its use in composite timber products, and incentives for the establishment of localised industries to utilize this resource.

Albert
Lyrebird



The value of imports averaged \$740 per m³ while exports averaged \$90 per m³ (woodchips realizing \$54 per tonne), imported timber therefore realizing 8.2 times the value of exported timber on a volume basis [57].

Allen Taylor & Co. Pty. Ltd's woodchipping plant at Tea Gardens was anticipated to produce 80,000 - 85,000 tonnes of woodchips in 1989 [58]. This plant is chiefly responsible for processing forest residues, with over 80% of its input arriving as logs large enough and straight enough to fit on a standard logging truck.

Employment in processing this timber is 6 people (including a manager and maintenance person), which is approx. one employee per 14,000 tonnes of woodchips produced per annum.

In contrast sawmills often have employment ratios in the order of one employee per 400-500 m³ nett (approximately equal to 480-600 tonnes) of timber processed annually.

Veneer mills may have employment ratios up to 5 times that of sawmills. On the lower end of the scale, a sleeper getter may have an annual average output of 360 m³.

NEFA believes that export woodchipping is a low quality use of our forests since there is no value added to raw forest materials in Australia.

It would seem that by using a portion of the timber currently being woodchipped for the local manufacture of value added and/or composite timber products, aimed at replacing timber imports, it would be possible to reduce/eliminate our trade deficit and increase employment opportunities.

Increased recycling and use of non-timber fibre, as well as timber, in local manufacture of paper products can also reduce the importation of woodpulp, paper and paper products, which totalled 709,505 tonnes in 1985-86.

It is often left to the discretion of miller as to whether low quality sawlogs are used for sawn timber or woodchips, consequently many such sawlogs are being woodchipped.

A sawlog specification was taken to the Tea Gardens Woodchip Mill of Allen Taylor P/L by members of NEFA to ascertain the extent of this problem of woodchipping sawlogs. Using the specifications provided to the FCNSW by the company, some 20% of logs at the site were of sawlog quality.

There are also apparent conflicts where timber used for woodchipping could have been used for other purposes (e.g. pallets, poles, pit props, hewn timber). NEFA has heard specific complaints from sawmillers claiming to have been adversely affected by woodchipping operations.

It is believed that this problem of selling a timber resource capable of higher value uses for a lower value product is widespread.

10. WOODCHIPPING

NEFA is very concerned at the extent to which woodchipping has gained a foothold on the north coast and the industry's potential ability to expand.

We have been pursuing the Federal Government to ensure that the Federal legislation is fully implemented and the impacts of export proposals properly examined before further export licenses are issued. We believe that the impropriety of woodchipping operations and procedures in northern NSW warrant a Commission of Inquiry, under the EPA Act.

X In the 1990 federal election campaign, the then federal Minister for the Environment Senator Richardson, gave a public undertaking [56] that export proposals would be properly examined in the future. The Brisbane Forest Products trial licence ^{was} may not be re-approved until the necessary EIS is completed and Sawmillers Exports' licence should not be approved for next year until this EIS has been done.

Meanwhile, Allen Taylor & Co. Pty. Ltd, a subsidiary of the Boral group, has had an EIS prepared for their woodchip plant at Tea Gardens, in Great Lakes Shire. NEFA understands that this EIS does not meet the Director's requirements for the EIS, in that it does not address the environmental impacts of the sources, recovery or transport of its woodchip feedstock.

The woodchipping plant appears to have been operating without development consent for some 5 years, and was issued a new federal export licence while, technically, operating illegally in NSW. When asked about this by members of NEFA the federal Department of Arts, Sports Environment and Tourism (DASETT) blames the federal Department of Primary Industry and Energy (DoPIE), while the company has claimed that it has been operating under the oversight of the FCNSW!

At its meeting of 10.7.1990, the Great Lakes Shire Council rejected the company's EIS on the grounds that it did not adequately address the off-site impacts of the operation, as required in additional Requirements issued by the Director of the Department of Planning under clause 58 of the EPA Act Regulations.

Council referred the matter back to the Department of Planning for a Commission of Inquiry. Subsequently, however, the applicant Allen Taylor Pty. Ltd. has lodged an Appeal in the Land and Environment Court based on the Council's deemed refusal to approve their proposal.

How has the FCNSW approved quotas and issued licenses to a company which does not have approval to operate its primary plant? What action has the FCNSW undertaken to ensure the compliance of the company with the requirement of NSW laws?

In 1985-86 Australian imports of timber and timber products totalled some 1,955,129 m³ and exports totalled some 3,745,770 m³ (mostly (4,447,243 tonnes of woodchips).

?

It is the old growth forests and individuals that provide the bulk of the large sawlog resource. As they have been badly overcut [55], many Management Areas have had to drastically reduce their sawlog quotas. A large number of State Forests and some entire Management Areas have been cut out of large sawlogs.

Many foresters express concern in Annual Management Reports about shortfalls and miscalculated 'sustained' yields, e.g. Tenterfield, Casino West and Urbenville Management Areas.

X Quotas for sawlogs have only been maintained this long in some Management Areas because of the utilization of species previously not greatly utilized (e.g. Brush Box) and the introduction of machinery to process logs down to 30 cm. diameter at breast height (dbh) rather than the 40 cm. dbh. limit for quota logs which has been historically applied. and is a prescription for a number of Management Areas.

Large sawlogs are obviously not being managed on a sustained yield basis. The FCNSW would face considerable difficulty in proving 'sustained yield' since in some Districts the logging history maps and/or compartment logging histories are hopelessly out of date, grossly inaccurate or 'guess-timated' at a later date.

The Forestry Commission apparently considers sustained yield to be sustaining the volume of timber harvested, and not the specific uses of such timber. While sawlog availability has been rapidly declining, woodchip volumes have been increasing.

NEFA adopts the definition of 'sustained yield' as being:
"the use of a resource at a rate and in a manner that can be continued indefinitely without causing significant environmental degradation".

In relation to timber production, sustained yield must mean:
"the production of the specific species utilised, in the size classes utilised, in perpetuity".

R.45 NEFA recommends that FCNSW adopt a definition of sustained yield consistent with providing a range of products, in sizes and species, in perpetuity.

R.46 NEFA recommends that FCNSW should immediately implement a sustained yield policy, recognise that sawlogs cannot be supplied in the sizes, species and volumes of previous years and act immediately to reduce and redirect timber demand.

FCNSW MANAGEMENT NOT COMPETENT TO PROTECT FOREST VALUES

The Forestry Commission maintains that flora reserves, filter strips along some streams (which can be logged but not entered with machinery) and steep unloggable country are adequate to preserve native species.

The more productive forests on slopes less than 25-35 degrees are managed for timber production and, where undertaken, environmental assessments are inadequate and modifications to logging operations for floral and faunal conservation are generally only token efforts. See above.

Steep unloggable country is generally not suitable optimal habitat for many forest species and the Commission's assertion that its unloggable areas, tiny filter strips/wildlife corridors and management prescriptions are adequate for species preservation demonstrates the almost total lack of expertise and understanding necessary for wildlife conservation management within FCNSW.

SUSTAINED YIELD - A DEVALUED AND COMPROMISED CONCEPT

The Forestry Commission claims to be managing forests on a sustained yield basis yet Curtin et al (1987) [53] note that of the 19 Management Areas on the North Coast, 12 are on estimated sustained yield for sawlog production, and 7 indicate that current levels of harvesting need to be reduced.

In answer to a Parliamentary Question on Notice asked on 11.10.89 by the Honorable R.S.L. Jones, Mr Bob Rowland-Smith as Minister representing the Minister for Natural Resources, provided a statement from the Minister, Mr Causley that:

"All 22 Districts have sustained yield management strategies in place. In 7 Districts these provide for progressive reduction schedules for sawlog quotas to achieve levels which will be sustainable in the long-term." [54]

This answer demonstrates the difficulty the Minister and the FCNSW have in distinguishing between having a strategy in place and operating on a sustained yield basis. Further, 2 years after the Curtin report the same 7 Forestry Districts still have not adjusted quotas to sustainable levels.

Presumably, the reluctance to effect the quota reductions is influenced by the logging companies which wish to continue logging at unsustainable levels until they are forced to reduce or until the sawlog quota cannot be met because the sawlog resource has been logged out.

The inability of the FCNSW to effect the required quota reductions over a period of several years informs poorly on the Commission's effectiveness and efficiency. If the industry has quotas which are not sustainable NEFA recommends that they should be immediately reduced to sustainable levels, not allowed to continue logging at unsustainable rates!

catchment has been increased and the absorption capacity diminished. Flash floods and increased and prolonged flooding are obvious effects.

IMPACTS ON GLOBAL CO2 LEVELS

All burning adds CO2 to the atmosphere and the fire frequency of FCNSW would appear to be a significant factor in continued high levels of CO2 emission in NSW.

It has been estimated by NEFA that millions tonnes of carbon are released into the atmosphere annually in NSW due to logging and associated burning.

Despite the timber industry propaganda which asserts that the conversion of 'old growth' forests to regrowth forests would assist in combating the Greenhouse Effect, it has been established in the United States that the conversion of 'old growth' forests to regrowth forests contributes to the Greenhouse effect, [52] i.e. more carbon dioxide is released through logging these areas than could be bound up by new regrowth forests.

The FCNSW's support for this erroneous assertion by industry propagandists and the repetition of these claims by its staff is alarming, particularly where irreplaceable old growth forests, our natural heritage, are being irrevocably degraded.

Espousing such a pre-emptive 'log the forests to save the world' position is tantamount to advocating breaching the EPA Act. More seriously though, this view implies that contributing to the planets bio-diversity crisis, through removing crucial habitat areas, is more acceptable in FCNSW's view than addressing the Greenhouse Effect.

R.44 NEFA recommends that no 'trade-offs' of these global issues: maintenance of biological diversity and reducing the impacts of the Greenhouse Effect; are made but both issues appropriately addressed.

Perhaps the reason why this specious argument gained currency in NSW in the first place is due to the lack of research and basic scientific work being undertaken by the Commission to understand and quantify the ~~evolution~~ of NSW forest ecosystems. It certainly indicates FCNSW's lack of knowledge of ecology.

Another informing factor may be the industry's vested interest in distorting public concern over the greenhouse Effect to gain access to the last of the ancient forests, before environmentalists are able to document the non-timber forest values and succeed in gaining their removal from timber production for all time.

IMPACTS ON SOILS

X Through the construction of roads into forests and the use of vehicles ^{and machinery} off forest roads, the soils of many forests are being negatively affected.

X Soils are being compacted by vehicles ^{machinery} and by hard hooved animals, such as grazing cattle, affecting root growth and decreasing productivity.

NEFA believes that road construction destabilizes soil structure, creates loose soils, bares soil and concentrates water flows. Roads are major and long lasting sources of soil erosion and thus the degradation of streams by sedimentation and turbidity.

Nutrients which would normally remain within the closed forest ecosystem are being removed in timber, washed into streams and going up in smoke. Large amounts of nutrients are lost in smoke during a fire, by overland transport via wind and water and by leaching following fires [50] [51].

Repeated burning radically reduces the soil fertility and selects for the species suited to the lowest fertility soils and regular disturbance. Ecosystem potential is in a downward spiral with gross land degradation the likely result in the near future.

Conversely, the introduction of cattle can mean a increase in nutrients, through cattle manure, leading to the eutrophication of soils. This process also disturbs the soil fertility balance and can select in favour of species suited for higher fertility soils. Very often these species are weed species introduced by the cattle, vehicles or other vectors.

Cattle and feral pigs are major sources of streambank and wetland degradation.

On steeper lands, the combined impacts of logging, roadworks and burning leads to the degradation of soil structure and stability and causes significant erosion.

IMPACTS ON WATER RESOURCES

Poor forest management practices have serious consequences for water quality and quantity since streams and dams suffer from increased sedimentation. Flora and fauna downstream, dependent on water quantity and quality are affected by changes in stream flow, sedimentation and turbidity.

Water turbidity will continue to increase and communities dependent on forested catchments for water supply will lose the high water quality available from undisturbed catchments.

In dry periods stream flows will decrease due to higher transpiration of regrowth and less soil storage.

In wet periods the stream flows will be increased since there is less canopy interception, the run-off area of the

IMPACTS ON FLORA

Through logging and grazing, but more significantly, through ^{and} greatly increased fire frequency, FCNSW and its grazing lessees are degrading North Coast native forests and dramatically altering the actual composition of species within forests. FCNSW carries out these activities in an attempt to achieve species dominance and forest conditions which are perceived to be beneficial for logging and grazing.

Once diverse heath, native grass and rainforest understories are being converted to dominance by Bladey Grass, various brackens, some Acacias, and weeds by too frequent burning.

If this continued burning and indiscriminate harvesting continues, the diverse range of vegetation types found with NSW native forests will be ^{markedly} drastically affected.

NEFA believes that some of the consequences for forests flora of present and proposed management practices are:

- * species composition are being simplified or altered to favour commercial species;
- * old growth forests are being eliminated and replaced by regrowth forests and plantations;
- * large areas of forest are becoming less productive due to decreased soil fertility, compaction and degraded soil structure;
- * rainforests are being degraded, restricted in range and floristic diversity^{reduced} and smaller stands are being eliminated;
- * forest structure is continuing to be degraded;
- * inadequate regeneration is widespread and is affecting many forest areas;
- * the chance of wildfire is being enhanced by increases in fire promoting (adapted) plants, susceptible regrowth and loss of rainforest species;
- * complex overstories and understories are being reduced to simple forests of plants adapted to frequent disturbance;
- * continued increases in introduced, fire adapted and early successional plants with corresponding decreases in native, fire sensitive and later successional plants.

In some Management Areas, it is clear that the application of the above management practices to secondary rainforest in particular, constitute a deliberate attempt on the FCNSW's behalf to eliminate or restrict to tiny areas, up to 80% of the species which were originally present.

NEFA asserts that there needs to be a thorough, urgent and independent inquiry into the effects burning practices have on natural ecosystems & the long term ramifications of continued fire use.

to deliberate acts are considered grossly inadequate.

At the level of the forest ecosystem, the consequences of these management practices, within an ignorant, uninformed and tunnel visioned management perspective, are very serious. They are described below.

IMPACTS ON FAUNA

Many native animals are disadvantaged or killed by logging operations through:

- * habitat loss (see below);
- * machinery kills;
- * death through tree loss or during felling;
- * food chain interruption;
- * territorial competition within species populations;
- * increased competition from fauna from more open habitats;
- * an increase in introduced predators e.g. feral cats, foxes;
- * loss of specialised food sources and niches e.g. rainforests;

Insufficient hollow-bearing trees, and potential replacements, are being retained - threatening the survival of many hollow-dependent animal populations.

Management to ensure regular replacements of habitat trees is inadequate [14][15].

It is likely that soon after logging concludes, the few retained hollow-bearing trees will be blown over, burnt out or die, killing the majority of the surviving hollow-dependent animals;

The removal of large logs on the ground through frequent fires or forest residue woodchipping, and over time, the loss of 'old growth' trees which provide large logs, will reduce the large range of fauna dependent upon them;

The alteration and simplification of understories by logging and more particularly prescribed burning and grazing, is affecting a large range of native species dependent upon complex understories for food sources, nest sites, shelter, protection and a variety of other attributes.

X The elimination of rainforest understories and the attrition of rainforest margins through logging and burning, coupled with the opening up of rainforests by road construction and logging adversely affects the populations of rainforest animals [14].

X The inevitable consequence will be a reduction in fauna preferring mature forests, rainforest, specialised food source, and stable micro-climates and correspondingly, a reduction in populations of endangered species, with increased risk of extinctions.

ROAD CONSTRUCTION, LOGGING, BURNING, GRAZING

All of the FCNSW's forest practices, as currently carried out, have serious and significant actual and potential negative impacts.

The construction of new roads or the substantial upgrading of previously existing fire-trails, is one very significant activity, [34] which often precedes the commencement of other damaging activities.

Logging, and the construction of temporary log dumps, snigging tracks and forest camps has very marked impacts which require very long periods of time for restoration.

The use of frequent fires is one forest practice which receives little public attention generally, but which has very significant impacts indeed. FCNSW uses burning as a major management tool yet appears to have little concern for the consequences of this practice. The Forestry Regulations governing the use of fire do not apply to the FCNSW or its licencees.

Cattle grazing and bee grazing are permitted in most accessible forests despite the fact that these activities directly compromise the natural forest values.

Given that the FCNSW produces no information about the impacts or management issues which these activities generate, it would not be unreasonable to assume that the FCNSW does not enquire into the consequences of these practices.

In 1986/87 the Forestry Commission received \$405,000 from grazing permits and \$153,000 from bee-farming permits [48]. NEFA believes that the environmental degradation caused by these practices is significant and if converted into monetary terms would be far in excess of the monies received.

NEFA considers the differing environmental impact of both cattle and bee grazing to be unacceptable in areas of high conservation value.

R.42 NEFA recommends that cattle and bee grazing be excluded from forest areas which possess significant natural values.

In the field, there are often questionable practices permitted. Sometimes FCNSW marks trees for removal and sometimes it marks for retention [49]. This irregularity has produced confusion amongst forest fallers with serious consequences.

R.43 NEFA recommends that standard field management practices be adopted and consistently applied.

Where breaches of logging codes occur, such as tree felling in a filter strip and across a stream, the FCNSW warns operators in the first instance, would impose a \$50 fine in the second instance, and if repeated (and pushed by environmentalists) would suspend the licence. These responses

9. FOREST PRACTICES AND THEIR EFFECTS

A DELIBERATE POLICY OF ENVIRONMENTAL MODIFICATION

NEFA does not consider current management by the Forestry Commission to be compatible with maintenance of the natural environment. In fact, many of the FCNSW's forest practices have the deliberate intention of significantly modifying the natural environment to achieve perceived benefits for timber production.

Management is aimed at producing 'plantation type' forests of quick growing species, with an open understorey structurally distinct from the original complex and diverse native forests.

Clearfelling, or maximum economic utilization, culling, regular burning and sometimes plantings are used to manipulation regeneration. Often though, particularly in wetter forests, these management practices fail and regeneration is inadequate [47] turning productive forests into unproductive areas.

The value of these modifications to timber production remain unquantifiable, again because of inadequate accountability, since inadequate information is available to document the management activities and their effects.

Management of State Forest appears to be one huge series of experiments. When one experiment fails another is tried, even though the original and subsequent experiments are inadequately designed and monitored. NEFA is concerned that by the time the results of these experiments are assessed, if they are properly assessed at all, it will be too late to apply any relevant findings.

As indicated above, FCNSW generally fails to undertake floral, faunal, and archaeological surveys to document the range of forest values extant in an area prior to roading and logging operations.

Without this fundamental baseline data, the FCNSW is quite unable to evaluate the impacts of its forest practices, through its Environmental Reviews or Environmental Impact Statements, let alone design procedures which will mitigate the many negative impacts.

The Commission claims that it does not have the resources to undertake the detail of environmental assessment needed. However, FCNSW appears to have done very little in the intervening period of ten years since the EPA Act's commencement to acquire the needed resources through increasing royalties to reflect real and required costs.

The continued fundamental failure by the FCNSW to comply with a key NSW law is considered very serious shortcoming indeed, and must be addressed by the Public Accounts Committee in its deliberations, since these repeated and expensive failures go to the heart of accountability, efficiency and effectiveness within the FCNSW.

The consequences of failing to actively study the forests and produce accurate data bases of forest values are many and far reaching. Many of these consequences will be discussed in the following sections.

*Eucalypt
and developing
Subtropical
Rainforest*



The Commissioner, Dr Drielsma, has asserted to the authors that the FCNSW considers the 'significance of affect' of each case on its merits and at no time has the Commission formed the view that it will routinely avoid the legal obligations to prepare EIS's.

Dr Drielsma argues that all logging operations were never meant to be caught in the provisions of Part V of the EPA Act, yet conveniently ignores the fact FCNSW is building new major logging roads into these old growth forests and wilderness nominated areas.

These assertions by Dr Drielsma are not accepted by NEFA and stand in stark contrast to the FCNSW's continued failure to comprehensively study the forests it purports to be managing, as required under s.111 of the EPA Act. *and with the first precedent being established 10 years ago by the Kivi vs the FCNSW case*
NEFA understands that FCNSW has failed to honour publicly announced commitments to prepare Environmental Impact Statements on at least three occasions.

No EIS's have been prepared for Conifer Plantation developments in the Bathurst and Nundle-Noandoc areas despite public undertakings to do so given in 1979, and no EIS has been prepared for Conifer Plantation development in the Tallagandera area, near Queanbeyan, despite a public undertaking in 1985.?

All three of these major pine plantation developments required the clearance of native vegetation and the planting out of exotic Pinus sp. Apart from constituting illegal works these works are a breach of public announcements.

The PAC should actively inquire why these EIS were not done after the announcements were made, and on whose authority were the works commenced, in breach of the EPA Act.

How can the FCNSW consider each case on its merit when it has little or no detailed information on which to base such a consideration?

It is the view of NEFA that a failure to study the forests is a longstanding 'de facto', i.e. unwritten but understood, policy of the FCNSW.

This apparent policy appears to have its historical roots in a lack of desire to manage forests for wildlife and flora conservation, the economic implications of the cost of undertaking detailed forest surveys and an ongoing antagonism to the EPA Act.

Both cost and attitude are factors in driving this 'policy' of ignorant decision making, which consistently and directly leads to the conclusion that the proposed roadworks and/or logging will not 'significantly affect' the environment.

To this end, the policy of not studying the forests under management, means that when FCNSW considers the significance of affect of any proposed activity, little or no information on the real effects is available to inform the decisions.

An additional matter was commenced; Barrett vs. FCNSW (Dome Mountain) in 1988 but was discontinued since the FCNSW backed down and agreed to prepare an EIS for the proposed works.

R.40 NEFA recommends that FCNSW voluntarily and consistently comply with Part V of the Environmental Planning and Assessment Act, 1979.

The cost of defending these court actions is avoidable. The Public Accounts Committee should recognise that the tens of thousands of dollars involved in defending successful court actions by public interest groups or individuals are wasted funds, unproductively employed.

Similarly, the monies paid out by the FCNSW to cover court costs awarded to public interest applicants and against them in unsuccessfully defended cases e.g. Bailey vs FCNSW (Mistake SF) would never have been needed to be spent if the Commission was faithfully discharging its legal obligations.

R.41 NEFA recommends that PAC enquire into the costs of defending and settling the court actions named above.

One of the authors, Mr Corkill has pursued two injunctions in 1990 (Mount Royal SF and Chaelundi SF).

Following agreement from the FCNSW to now undertake the preparation of an EIS, the Mount Royal SF case has been discontinued with FCNSW to pay costs.

In the Chaelundi SF case discussion is underway as to the terms of an agreeable undertaking which would see the case discontinued, and an EIS prepared before works proceed. This matter was previously proposed to before the Court with the FCNSW seeking the Courts discretionary order to permit logging while the EIS is compiled!

An EIS is being prepared for only three (3) compartments of the thirty (30) compartments the subject of the injunction. The period for completing this EIS is felt to be grossly inadequate and will prejudice any competent evaluation of the forest environment, since spring and summer conditions in the forest will not be studied.

NEFA is concerned that the EIS will simply be a 'desk top' review of the inadequate published material, without adequate field investigations. It appears that this document will purport to be an EIS, in an attempt to satisfy the requirements of ss.111 and 112.

Any incompetent, tokenistic document designed to justify the ambition for logging of this special 'old growth' forest and wilderness will confirm the moral bankruptcy of FCNSW, reinforce the public perception of their evident disregard for the EPA Act, and as such will be challenged in the courts.

The applicant's costs for Mount Royal are estimated to be in excess of \$18,000 while costs for the Chaelundi case already exceed \$25,000 and continue to accumulate.

8. COMPLIANCE WITH NSW LAWS

Aside from the criticism of the FCNSW non-compliance with the Forestry Act's requirements for the preparation and review of Plans of Management, NEFA wishes to highlight the FCNSW's continuing failure to comply with the requirements of the EPA Act as described above.

FCNSW has never undertaken to fulfill the requirements of s.111 of the EPA Act. It regularly makes Plans of Management and operational decisions without having researched "to the fullest extent possible" the forests they are purported to be managing.

The Commission routinely commences works in areas where there has been no systematic surveys of flora, fauna, geological or archaeological values.

FCNSW staff rarely have comprehensive resource documents at their disposal to guide day to day management and no such body of research information is generated or maintained to inform the formulation of Plans of Management, reviews or presumably state wide policies.

In short, the Forestry Commission has insufficient information on the nature of the forests they are degrading to determine their impact of their activities upon it. Certainly whatever information exists is insufficient to determine what is required to mitigate such impacts.

The gathering of adequate information, e.g. through the preparation of an EIS, has been resisted by the FCNSW often on the grounds of expense [46].

The requirement of additional funding to comply with the EPA Act has important implications for the Commission's financial operations, especially its inadequate royalty rates, discussed in more detail in Section 16 of this submission.

R.39 NEFA recommends that FCNSW incorporate the costs of complying with the EPA Act, including the cost of preparing EIS's into its royalties charges.

Even where subsequent research in forests and decisions of the Land and Environment Court have shown the Commission's practices to be inadequate, FCNSW still persists with its patently unacceptable procedures and practices.

The FCNSW's continued abrogation of its responsibilities under the EPA Act have provoked a series of injunctions in the Land and Environment Court, aimed at forcing FCNSW's compliance with these laws.

These cases undertaken by private individuals, in the public interest, commenced in the early 1980's with Kivi vs FCNSW (Goonimbah SF / Mount Nardi), 1982; Prineas vs. FCNSW (Mount Boss SF), 1982; Bailey vs FCNSW (Mistake SF), 1988; Jarasius vs FCNSW (Eden District) 1988 and Jarasius vs FCNSW (Eden) 1989.

f) The obligation to examine a forest environment necessarily involves site-specific surveys for fauna, rare and endangered flora, archaeological and cultural sites, visual impacts, (not only on the forest but on the surrounding lands), erosion and stream disturbance.

The obligation to examine the forest environment is quite separate and distinct from the obligation to produce an EIS where activities having a significant impact upon the environment are proposed." [45]

Under s.112, where it is found that the works will or are likely to "significantly affect the environment" the FCNSW shall not carry out an activity, or grant an approval unless it has obtained or been furnished with and has examined and considered an environmental impact statement (EIS).

Further, the FCNSW must comply with a range of other procedures relating to the notification, consideration and exhibition of the EIS, pursuant to ss.112 and 113.

ENVIRONMENTAL PLANNING AND ASSESSMENT ACT REQUIREMENTS

The undertaking of forestry activities by the FCNSW falls within the ambit of Part V of the Environmental Planning and Assessment Act 1979 [8].

Nowhere is this fact recognised or reported in the FCNSW publication Forestry in New South Wales - Planning for the Future [35].

This is surprising since statements in the 1987/88 and 1988/89 Annual Reports of the FCNSW show that the Commission is well aware of its responsibilities.

Under Part V of the EPA Act, the FCNSW is required under s.111, notwithstanding the provisions of its own Act, to "examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity".

This is a clear and unambivalent requirement that before any works commence the FCNSW must study the forest it is managing and proposing for works.

These requirements are clearly stated in advice of counsel, [45] Mr Tim Robertson, Barrister-at-Law, to the authors in regard to applications for injunctions against the FCNSW in the Mount Royal SF and the Chaelundi SF.

Mr Robertson advises:

"From that review of the authorities the following principles may be stated:

- a) Before the Forestry Commission can embark upon logging, roading or burning activities, it must examine the environment and the impact of its proposed activities upon that environment;
- b) It must take into account to the fullest extent possible the results of that examination;
- c) The activities may not be carried out without obtaining, examining and considering and environmental impact statement where these activities are likely to significantly affect the environment.
- d) The logging, roading and burning of old growth forests may be said to be or have a significant impact on the environment whether the environment is defined as local or regional;
- e) As a matter of law, the relevant environment is the area of land upon which the activities will directly impact and any other land which may suffer indirect impacts from the logging, burning and roading activities;

Disturbingly, this admission also indicates that the FCNSW left the half-finished road in such an unstable state when rain interrupted works that the SEMC would not remedy the situation.

Following receipt of this reply NEFA's solicitors wrote again to the FCNSW, seeking no substantial completion of the road works pending a joint NEFA/FCNSW inspection of the site and agreement on the minimum works needed to effect stabilization.

The Commission agreed to this procedure in a letter of 13.7.1990, but proceeded to complete the road while their letter was still in the mail. FCNSW alleges that they sought to make contact with the nominated NEFA person, Mr Pugh, during school holidays, but were unable to do so. No attempt was made to contact NEFA's solicitor or the complainant, Mr Corkill. Instead they rushed ahead and completed a road whose construction was patently illegal.

In another instance, NEFA found that a filter strip adjacent to Wattle Creek, in Spirabo SF in Tenterfield Management Area, had been logged, with trees felled beside and into a major creek and machinery operated up to the creek bank.

This breach of the SEMC was reported to the FCNSW who claimed ignorance of the fact, since they had not inspected the area after logging. After subsequently inspecting the area the District Forestry staff agreed the work was a blatant breach, since the filter strip had been marked on the Harvesting Plan and on trees.

Despite the fact that the area was suitable habitat for the Hastings River Mouse, [41][44] listed as in 'Imminent Danger of Extinction' [37], and an adjacent valley to the Forestland SF population, only a warning letter was sent to the falling contractor.

The allowance that the SEMC are only implemented at the end of operations (often some months after work commences) leaves logging areas open to serious erosion for long periods. In some states in America, e.g. California, there are requirements that such conditions be applied before logging operations cease for the day if rain is likely.

That these conditions are guidelines only and not binding requirements on the Crown with statutory effect and independent means of enforcement is of considerable concern to NEFA.

R.38 NEFA recommends that the Standard Erosion Mitigation Conditions be thoroughly reviewed, particularly in reference to slopes greater than 25 degrees (which should also be considered for exclusion from logging), and the reviewed SEMC given statutory effect through incorporation within the Forestry Regulation and made binding on the Crown.

These prescriptions have been known to fail even where species have been identified. One little known example is in the Forestland SF in Tenterfield District. The logging up to the boundary of known habitat and the subsequent burning of the filter strip, allegedly by wildfire, caused the apparent elimination of the largest recorded population of Hastings River Mouse in New South Wales. [41]

X Because of the lack of surveys undertaken by the FCNSW there can be no doubt that unknown populations of a range of important species are being eliminated. *or adversely affected.*

Very few specific prescriptions for the protection of other native species - endangered or otherwise - are mentioned in management plans.

R.36 NEFA recommends that a thorough review of all existing PMP prescriptions be undertaken urgently by independent scientists funded by the NSW Government.

R.37 NEFA recommends that recommendations for additional appropriate PMP prescriptions be prepared urgently by independent scientists funded by the NSW Government.

Standard Erosion Mitigation Conditions

Standard Erosion Mitigation conditions are imposed to reduce erosion during logging operations. Logging is allowed to extend on to 25 to 35 degree slopes.

When Justice Hemmings was presented with the relevant evidence, in Bailey vs. Forestry Commission, he considered it doubtful that such conditions were adequate for slopes over 25 degrees [42].

In a number of field inspections, NEFA representatives have observed several areas where the Standard Erosion Mitigation Conditions (SEMC) [43] have not been applied, have been inadequately applied, or where applied have failed. e.g. the construction of Nevasae Rd into Blackbutt Plateau in the Nullum SF.

In one recent case, NEFA discovered that road construction had commenced in the Boorook SF in Tenterfield District before a EIS was prepared, and challenged FCNSW on the legality of their pre-emptive works, requesting compliance with the EPA Act requirements for an EIS for activities likely to have a significant effect on the environment.

In a letter of 20.6.1990, to Mr Corkill's solicitor, the FCNSW asserted that it had to substantially complete the construction of the proposed road because the "construction of simple cross drains in accordance with the Standard Erosion Mitigation Conditions would not effectively drain and stabilise the road works".

This startling admission demonstrates that the adequacy of the SEMC is in doubt in even the FCNSW's estimation.

In his Affidavit [15], Dr Norton, of the Centre for Resource and Environmental Studies (CRES), has indicated that in some species individuals are territorial and will defend their territories from others, leading to intense competition for habitat.

He says: "The logging of these compartments in accordance with the harvesting plans and having regard to the management prescriptions will have serious implications for the survival of important segments of the resident populations of arboreal marsupials and owls. Further, the logging could undermine the complexity of these forests in toto."

These affidavits and other available evidence [18] [19] [20] show that the retention of so few hollow trees seriously reduces numbers of hollow dependent fauna, and coupled with the failure to retain potential replacement trees, threatens the future survival of a number of animal species.

These are unacceptable practices for any logging operation, let alone for logging in 'old growth' forests.

In addition, in his affidavit for the Chaelundi court hearing [14], Dr Recher points out that filter strips along watercourses, required under the Standard Erosion Mitigation Conditions, designated as 'wildlife corridors'

"are too narrow for fauna protection and the proposal to allow logging within the outer 20m of the 40m wide wildlife corridors effectively negates any value for fauna protection that they might have had".

He asserts that the filter strips, described in the Harvesting Plans as 'wildlife corridors' have:

"little or no value as corridors".

X The second PMP prescription, the retention of trees identified as Yellow-bellied Glider feeding trees is also considered unacceptable.

Apart from the fact that this prescription ignores the needs of other tree dependent species, whether rare and endangered or not, the prescription is rarely operated effectively since NEFA has found that those responsible for determining which trees to fell in the field, generally, could not identify a Yellow-bellied Glider feeding tree.

Other general prescriptions are applied to protect the endangered species Rufous Scrub Bird and Hastings River Mouse. These prescriptions for exclusion of logging only apply to where the species are known to have been located, and are considered insufficient since there is no investigation of suitable, potential habitat prior to logging. No adequate assessment of the effectiveness of these prescriptions e.g. prohibition of logging 20 meters around a known Rufous Scrub bird site, has been undertaken.

Harvesting Plans

Harvesting Plans are prepared for specific compartments to be logged. These documents detail anticipated yields and delineate where logging tracks and log dumps are to be constructed. Together with the Forest type map, Harvesting Plans show filter strips, reserved areas and state the erosion mitigation conditions to be applied.

NEFA similarly considers ^{that they are not always done prior to logging and} these plans to be grossly inefficient, and have found ^{twelve} one instance where a harvesting plan was fabricated some ^{two} years after rainforest logging began in a compartment e.g. Compartment 679 Billilimba SF in Casino West MA.

Logging histories

Annual Reviews

These documents, which are supposed to reconcile the annual management activity with the over-arching Plan of Management, are not released to the public and yet form the only vehicle of internal review and accountability.

That they are withheld is considered unacceptable by NEFA, as is the fact that they are compared, in the first instance, with grossly unsatisfactory planning documents. When inspected under Freedom of Information Act, 1988 [40] these reviews have highlighted many management failures and exhibited the poor standards of accountability. Generally, these reviews are inadequate documents which give scant regard to non-timber values.

R.35 NEFA recommends that Annual Reviews be made more comprehensive and released to the public.

~~Preferred Management Priority Classification Prescriptions~~

NEFA understands that there are only two specific prescriptions for wildlife management generally applied to forest operations.

The retention of an average frequency of one hollow-bearing tree per hectare - preferably in clumps of five hollow-bearing trees per 5 hectares - is considered unacceptable as an effective wildlife management prescription. Its use and continued justification in ^{and change's primarily in some areas} the face of criticism is an indication of the FCNSW's lack of understanding of the needs of the range of hollow dependent fauna.

In Affidavits prepared for legal action over Chaelundi SF, two expert scientists, Dr Harry Recher UNE [14] and Tony Norton ANU/CRES [15] have described the proposed PMP Prescriptions as 'inadequate' and 'likely to seriously compromise many of the biological & conservation values identified for the forest'.

Dr Harry Recher, Associate Professor in Ecosystem Management at University of New England, in conversation with the authors, has described the 1 tree per ha. Prescription as having been 'plucked from the air' and 'unable to be supported as adequate by scientific evidence'.

LOGGING HISTORIES At least since the 1970's Management Plans use foresters' notes are meant to have kept records of fires and logging in the forms of maps and compartment histories and get even in the 1990's NEFA has found that many Management Areas still don't have adequate, if any, such maps and compartment histories

Wildlife Act, 1974, [37] and its capture at Mount Royal in 1984 represented the southern-most locality record of the species and only the third locality record for NSW [38].)

X Often these Plans refer detailed planning of forest areas to the environmental reviews which ^{are meant to} precede new logging or roadwork operations.

NEFA considers that the current nature and content of Management Plans make these plans unsatisfactory tools for planning for forest management.

Given the regular failure of FCNSW to meet the minimum requirement for Management Plans to be reviewed after 5 years and before ten years after their preparation, the following recommendation be adopted.

R.34 NEFA recommends that the requirement for ten year plans and five year reviews needs rigorous application and enforcement.

Environmental Reviews

Environmental Reviews are meant to be prepared to review the predicted environmental effects of imminent intended activities. They are generally prepared by the District Forester and countersigned by the Regional Forester.

NEFA has inspected a number of these Reviews and found them to be most unsatisfactory since they are based on no actual research or understanding of the forest ecosystems. They often ignore relevant information and appear as blatant and biased justifications for the intended works.

NEFA has also found roading and logging to be occurring in old growth forests where no Environmental Reviews have been prepared e.g. Styx River SF.

X In other instances where Environmental Impact Statements (EIS's) have been prepared in lieu of Environmental Reviews, recommendations have been ignored and works commenced. e.g. the undertaking in the Washpool EIS [39] that a reputed Aboriginal site would be located and recorded before logging commenced was ignored and the site logged, while the failure to survey another ^{recommended} area in 1989 resulted in a road being constructed through another site.

After the EIS's publication the Department of (then) Environment and Planning and the NPWS found that the EIS was inadequate. Despite this FCNSW still has not seen fit to prepare an Environmental Review.

Even though there have been public calls for adequate environmental assessment for over 12 months and written requests for compliance with the EPA Act from solicitors acting for NEFA, FCNSW has made no attempts to undertake floral, faunal, hydrological or geological surveys in the area.

though in practice management provisions vary widely with at the discretion of the District Forester, with management practices for conservation requirements, not such as greater retention of potential habitat trees, coupe systems, unlogged filter strips of riparian vegetation, and also management prescriptions developed in one region may also be applied to other areas where environmental conditions are so different as to render the prescriptions totally inappropriate and inadequate (e.g. standard Erosion Mitigation Conditions)

7. FOREST MANAGEMENT PLANNING

FORESTRY ACT PROCEDURES

Plans of Management

The principal vehicle for managing state forests under the Forestry Act is the District Management Plan. These Plans are prepared by District and Regional Foresters and are required to be updated every five years, but not later than every ten years.

In practice, this updating rarely takes place within 5 years and often is not completed after ten years.

The Management Plans for a District often includes a very large area of forest, a large number of state forests and forest types and can include forest areas with widely divergent purposes e.g. Flora Reserves. These Plans are consequently very limited in the detail they provide for each forest.

The anticipated timber yield is only dealt with in any detail in Harvesting Plans, though Annual Reviews often express concerns about overestimation and thus commitments.

These Plans ^{are stated to} usually draw on the general state wide policies of FCNSW and are applied as appropriate to the areas under management [35]*. Rarely do the Plans of Management contain accurate or detailed information about the forest ecosystems, their natural processes, dependent species or values other than timber.

No public involvement is possible in the preparation or reviewing of these documents, though the Plans are usually publicly available once they are completed. In a number of cases these plans have not even been made available to the public until they have been in use for two years. e.g. Wauchope, Wingham and Urbenville Management Plans.

To the best knowledge of NEFA, FCNSW generally does not undertake adequate, comprehensive surveys or research of the forests under management for inclusion in Management Plans. Often relevant research, either published or available to it through other research agencies such as CSIRO, is omitted or not taken into consideration.

Species lists from casual observations or predictions, including rare and endangered species, but often without accurate codings, are included but are often not addressed or accommodated in the proposals for management.

The Mount Royal Management Plan (1988) [36] where a reference to the Hastings River Mouse/Rat (Pseudomys oralis) is described merely as "unusual" is but one example of the poor standard of documentation and management evident elsewhere in the north east and NSW generally.

(In fact, P. oralis is listed as 'Fauna In Imminent Danger of Extinction' in Schedule 12, Part 4 of the National Parks and

6. LEGAL RESPONSIBILITIES APPLY

A range of legal responsibilities apply to the management of state forests, deriving from a number of NSW statutes including:

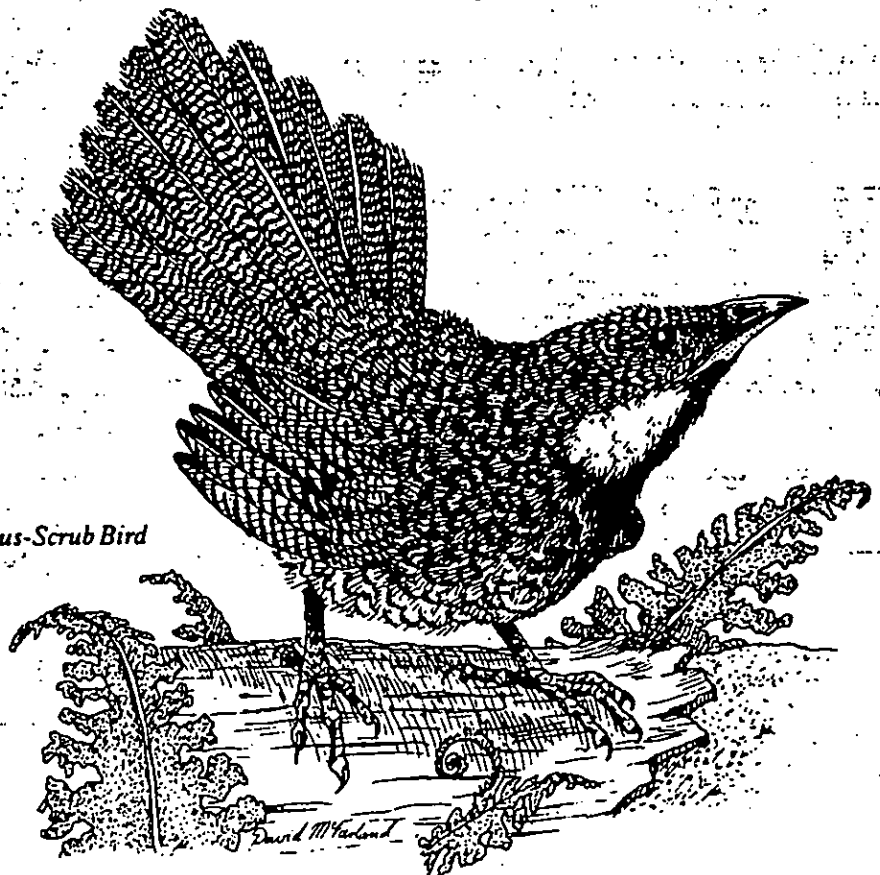
- * the Bushfires Act, 1949; [32]
- * the Clean Waters Act, 1970; [33]
- * the Environmental Planning and Assessment Act, 1979; [8]
- * the Forestry Act, 1916; [5]
- * the Wilderness Act, 1987; [10]

In addition, Justice Hemmings in his judgement on *Jaraisus I* [34, p40] has found that National Park proposals are among the matters which the FCNSW must consider in meeting its obligations under the EPA Act.

The compliance of the FCNSW with some of these legal requirements will be examined more closely in a following section.

R.33 NEFA recommends that FCNSW accept and comply with the broad range of legislation which applies.

Rufous-Scrub Bird



That this research and forward planning policy development is being undertaken by the environment movement has several causes, in the view of the authors:

- * the environment movement has been accused quite unfairly of setting out to destroy the timber industry (which if left to its own devices would soon crash anyway) and is attempting to demonstrate that it is not 'anti-timber' as the industry propagandists allege, simply 'anti' the destruction of high conservation value forests for very low value timber products;
- * the environment movement is a part of a broader social movement which is steering a course towards a fairer and more ecologically appropriate society in the next century and accepts that society, particularly communities rather than only governments, have a responsibility to minimise the social and economic impacts that a transition will inevitably encounter;
- * the FCNSW is a moribund captured bureaucracy, entrenched in the status quo and does not have the motivation, leadership, skills, information or vision that is needed to focus on the required shift in perspective towards a new era of forest management and timber production;
- * individual companies are still operating at significant profits and are unwilling to voluntarily reduce these profit margins or invest in seeking creative solutions;
- * the industry, via the Forest Products Association, and its national affiliates, is hoping to create a political climate where it can 'cry poor' and where it can use its political connections to attract considerable subsidies, compensation or government buyouts;

One indication already apparent is that in the immediate future, the supply of cheap, locally grown plantation softwood, mainly Pinus radiata, will proliferate. Long term estimates by FCNSW indicate that almost 80% of the locally grown timber in NSW will come from pine plantations by the year 2010 [31].

It is anticipated that this pine will sell for at least 25% less than the cost of native hardwood, though as indicated elsewhere in this submission the whole question of royalties and pricing needs careful evaluation. The pine can be substituted across a wide and increasing variety of uses.

By comparing estimates of pine supply in the Annual Reports and the Indigenous Forest Policy, NEFA estimates that in 1988 pine supply was running 60% higher than predicted.

With lower costs of production and as the supply of pine increases, its likely that the price of pine will plateau or drop, making competition by the hardwood sawlog sector of the industry with the pine products producers very difficult indeed.

Faced with such a prospect, it is easy to see why the hardwood sawloggers and millers are disinclined to recognise the inevitable and restructure for softwood operations now and reduce native forest logging to sustainable speciality logging.

These financial factors also clearly inform on the hardwood sawmillers desire to log the last of the unlogged ancient forests.

Looking back at the history of the timber industry, it is not a monolithic organism immune to change. Over many decades the industry has undergone important and far reaching changes and survived. The challenge for the future will be to adjust to changing economic, cultural and legal circumstances and to chart a course for a future in which the industry has a important though different role to that of the past.

The timber industry must accept this challenge and move with the times.

NEFA sees a definite role for a continuing ecologically sustainable timber industry. It is not opposed to logging 'per se', nor does it aim to 'smash' the industry. It does not seek to see families face hardship. However, NEFA believes that significant change within the industry is needed and urgently.

NEFA believes that if an adequate reserve system was established and the timber industry assisted to restructure to become more ecologically and economically sustainable, employment would be capable of being maintained, in the longer term, at levels higher than will be possible with a 'maintenance' of the current industry direction.

If the industry chooses to stick its collective head in the sand to ignore the ecological impetus for change or if it attempts to cynically manipulate social and political processes in its favour, it will provoke a clash of values which will inevitably rebound against it.

R.54 NEFA recommends that the PAC consider a process for focussing the options for transition away from old growth forest logging towards timber production based on plantations and value added timber products from regrowth forests; and explore opportunities for providing incentives for timber companies to take up these options.

13. PUBLIC PARTICIPATION PROCEDURES NEEDED

As a general statement, NEFA asserts that the FCNSW is not an accountable organisation, nor are there agreed or quantifiable procedures for assessing efficiency or effectiveness.

In order to bring the operation of the FCNSW into the 1990's and re-orient it to the imperatives of the 21st century a major restructuring (or structuring) of the Commission's accountability procedures is required.

One major way of ensuring accountability would be by opening this public authority, charged with the management of public resources in the public interest, to a series of public participation procedures.

These or similar provisions are already applying in part or whole in a variety of existing NSW legislation including:

- * the Environmental Planning and Assessment Act, 1979 [8];
- * the Heritage Act, 1977 [62];
- * the Environmentally Hazardous Chemicals Act, 1985, [63];
- * the National Parks and Wildlife Act (as amended) 1974 [9];
- * the Environmental Offences and Penalties Act, 1989 [64];
- * the Wilderness Act, 1987 [10].

Boer and Preston [29] canvass a number of proposals and amendments for facilitating public participation. They include:

- * the formation of a Forestry Advisory Council similar, in form and function, to the National Parks Advisory Council constituted under ss.22 and 23 of the NPW Act;
- * public participation in the preparation and implementation of forestry management and harvesting plans via the public exhibition of draft plans and the receipt of submissions from members of the public;
- * the preparation, exhibition and consideration of social impact assessments;
- * the ability for any person to take legal action to remedy or restrain an actual or threatened breach of the Forestry Act.

It is significant to note that the Institute of Foresters of Australia recognise in their National Forest Policy for Australia the importance of including public participation procedures in the preparation of comprehensive management plans for public forests [65]. The Institute advocates that

"....community participation in the planning process should be encouraged".

It is unfortunate indeed that here in NSW the 1987 policies of the professional institute for foresters still has yet to be adopted.

When implemented these procedures would ensure that information relating to efficiency and effectiveness would be easily available to the public. The regular review of the range of the FCNSW operations would then be much easier and correspondingly, less traumatic to the FCNSW.

R.55 NEFA recommends the amendment of the Forestry Act, 1916 to incorporate a range of public participation procedures to assist in better forest management and greater public accountability.

Failing the adoption of these provisions, applications for information under the Freedom of Information Act, 1988 would also assist the accountability of the Commission.

It must be recognised, however, that this is a very limited process of accountability which is both expensive and time consuming. Already it is apparent that some NSW agencies are prepared to use this Act as a means of not releasing information, and consequently of avoiding close scrutiny.

It is imperative that the FCNSW's financial operations are sufficiently profitable to cover the full cost of meeting the public's right to all information relating to the publicly-owned land under its control.

R.56 NEFA recommends that the FCNSW's financial operations be structured so as to provide funds sufficient to meet requests for information from the public.

No longer should the Commission refuse to release information on the basis of cost to reproduce it.

R.57 NEFA recommends that FCNSW not manipulate the FOI Act or other information provision processes to price information beyond the reach of members of the public.

14. FINANCES - FCNSW OPERATES AT A LOSS

For many years the Forestry Commission of New South operated at a substantial loss on its commercial operations, losing:

1984-85	\$12,110,000;
1985-86	\$ 1,474,000;
1986-87	\$ 3,724,000.

Finally, the FCNSW accounts showed a profit of \$12,419,000 in 1987-88 and in 1988-89 showed a further \$28,118,000.

In the same period the FCNSW eucalypt forest and operations lost:

1984-85	\$ 4,923,000;
1985-86	\$ 72,000;
1986-87	\$ 2,765,000.

In 1987-88, these operations returned a profit of \$1,974,000, and in 1988-89 a profit of \$7,384,000.

(Sources: Annual Reports for relevant years.
Note: Job Creation Grants have been excluded).

While this drastic turn-around of the Commission's profitability is long overdue, NEFA has still some reservations about the nature of the accounting procedures used to generate these latest figures.

According to the Casino District Forester (pers. com.) the turnaround of a \$100,000 loss in 1987/88 in the Ewingar Working Circle and the forecast of no foreseeable improvement in the future was due solely to changes in accounting.

R.58 NEFA recommends that PAC investigate whether the FCNSW recent profits cover all costs associated with timber production.

It is the authors contention that while showing a profit in relative terms the Commission is still not making a profit in real terms, since assets such as 200 year old trees are being sold at well below their replacement costs, ^{trading profit of 100,000} and there is inadequate compensation for environmental degradation being caused.

Figures for profit should include the costs of repairing and restoring soil erosion caused in roadworks, burning and logging, nutrients lost in timber, smoke and streams sensitive native species adversely affected and other environmental costs.

FINANCES - FCNSW RECEIVES CONSIDERABLE SUBSIDIES

FCNSW is subsidized via the public purse by:

X Commonwealth grants and various employment schemes
 \$1,267,000 in 1986/87, \$2,701,000 in 87/88, \$809,000 in 88-89;

Treasury grants \$1,580,760 in 1986/87, \$11,465,000 in 87/88 and \$13,300,000 in 88/89; and

Loans through the N.S.W. Treasury Corporation
 New borrowings in 1986/87 increasing the total Loan debt by \$24,456,000 to \$94,225,000.

At 30/6/'88 outstanding loans totalled \$108,462,000. Following FCNSW's incorporation the NSW Treasury assumed responsibility for FCNSW's loans of \$109,605,000!.

(Sources: Annual Reports for relevant years.)

Further, State and Federal government grants are provided directly to the timber industry, The Department of Natural Resources giving \$800,000 to the N.S.W. Timber Development Association in 1988/89.

It is evident that the timber industry receives a massive subsidy, both directly and indirectly, from the public purse to log publicly owned forests on public lands.

Given the significant environmental degradation resulting from timber operations (and the resultant financial costs) and the direct financial costs to the community, can the Forestry Commission be considered to be fulfilling its responsibility of managing forests for the benefit of the community?

This question is particularly salient since the recent Saulwick poll indicates the majority of the community would rather significant forest areas were protected than logged. In that survey 78% of the people surveyed agreed with the statement that "Forests should be protected where-ever possible" and 70% believed that "Preserving forests is more important than preserving timber workers jobs" [21].

FINANCES - FCNSW ROYALTIES WELL BELOW COST OF PRODUCTION

In 1986-87 the Forestry Commission received average royalties of \$9 and \$8.70 per m³ for hardwood and softwood pulpwood respectively. (These figures were determined using a conversion figure of 1m³ = 1.2 tonnes.) X

In 1987-88 the royalties were \$11.34 per tonne for hardwood pulp and \$11.37 per tonne for softwood pulp. In 1988-89 the royalties were \$11.32 and \$12.80 respectively

Average royalties per cubic metre (p/cu.m) for other timber products were:

	86-87	87-88	88-89
	\$	\$	\$
* hardwood sawlogs	20.79	22.93	25.06
* rainforest sawlogs	31.81	43.37	36.82 ?
* Cypress pine sawlogs	17.88	19.52	21.91
* Plantation softwood sawlogs	27.65	31.61	34.69
* Hardwood veneer logs	32.54	34.49	38.73
* Plantation softwood Veneer	45.04	44.90	39.29
* Hardwood poles, piles, girders	51.19	61.34	64.94
* Hardwood mining timber	11.41	12.13	12.53
* Plantation softwood pres. timber	10.50	11.55	12.40
* fencing timber	14.80	17.38	18.65

(Sources: Annual Reports for relevant years.)

NEFA suspects that none of these royalties accurately reflect the costs of production and do not include the cost of studying, understanding and replacing the forest ecosystems from which these products are produced.

R.59 NEFA recommends that all environmental costs be included in financial accounts.

While an endangered species forced into extinction because of logging is of immeasurable value, some aspects can be costed and should be included in the cost of production.

For example, the replacement costs of growing a 600 year old Tallowood in a plantation can be calculated, soil and nutrient losses resultant from fires and logging operations can be determined, and the cost of artificially replacing them can be determined.

The damage caused by logging trucks to road pavements and bridges, maintained by local councils, can also be determined.

NEFA notes advice from the Consumers Transport Council, based in Wollongong, which advised the Australian Conservation Foundation in July 1990 of its' research into the costs of road transport, particularly by six axle articulated trucks, of the type commonly used in logging and woodchip haulage.

The Council advises that the Bureau of Transport Economics in 1987 estimates "road track subsidies of about 2 cents per net tonne kilometre" are received for these six axle articulated trucks.

Further, Council advises the then NSW Department of Motor Transport in a submission to STAYSAFE Committee estimated that there are additional costs of 0.57 cents per net tonne for the costs of road accidents involving heavy trucks.

Council also notes that these costs will be increased if there is overloading of vehicles, a phenomenon which the DMR indicates is not uncommon.

Further, it must be noted that these costs are in dollar values relevant at the time of quoting and will be required to be recosted to 1990 values.

R.60 NEFA recommends that in setting timber royalties, the costs of undertaking detailed environmental assessments and compensation for the resultant environmental degradation should be taken into account.

R.61 NEFA recommends that the PAC enquire into the costs to local councils and state government from damage caused by logging trucks to road pavements and bridges, the desirability of the recovery of these costs from increased royalties and the allocation of these monies to authorities which incur the additional costs of maintenance.

It is simply not good enough for the FCNSW to complain of the cost of complying with the EPA Act when it has consistently failed to plan these costs and incorporate them into its royalty and budgetary calculations.

One of the major constraints on private plantation establishment is the low rate of return due to artificially low timber royalties.

The Forestry Commission utilizes 'free' land a 'free' resource (already growing) and has been able to operate at a loss. It has been able to sell timber at well below its true value. Most large trees now being logged, and sold for a pittance, were growing before European settlement.

What would be the true monetary value of a 600 year old Tallowood or 2,000 year old Brush Box if they were grown in plantations on purchased land?

NEFA considers that if royalties are raised to a more realistic level then this will be an incentive for private plantation establishment and (with other incentives) assist in better management of both public and private forests.

While royalties represent only a small portion of the value of processed timber it is obvious that any significant increase will flow through to the retail price.

One consequence of timber products accurately reflecting the cost of their production is the further enhancement of the use of timber imports. Higher prices for domestic timber will also lead to reduced demand and greater care in selecting and using timber products.

Most imported timber is obtained from rainforests and old growth forests, and its use, as well as being detrimental to our balance of trade, is environmentally unacceptable.

R.62 NEFA recommends that PAC give consideration to recommending banning the importation of rainforest and old growth timber and their use in NSW government funded buildings.

R.63 NEFA recommends that the imposition of an environmental tax on imports, with revenue being channeled into environmental protection and rehabilitation in the country of origin, be given consideration..



Pademelon

15. CHANGING COMMUNITY ATTITUDES

In NEFA's view discussion about the future structure and operations of the Forestry Commission and the NSW timber industry cannot be carried on with reference limited to the 'status quo', much less with reference to 'the good old days'.

In view of the numerous threats of extinctions, to attempt to argue for the fundamentally flawed 'status quo' in forest management and timber production is to damage one's credibility at the outset, while adopting a reactionary position about regaining the opportunities of the past must be seen as the posturing of entrenched vested interests.

So much has recently happened in the NSW community's awareness of global climate changes, in our understanding of forest ecosystems, in our appreciation of the non-timber values of forests, in changes to technology and in community attitudes towards forest protection and environmental awareness generally, that this crucial community discussion must commence from a very different perspective than it has in the past.

That perspective must be altered from the view of 'consumer' to that of 'conserver'.

R.64 NEFA recommends that the NSW government encourage the development of 'conserver' attitudes in the community and discourage 'consumerism'.

R.65 NEFA recommends that the NSW government encourage the effective recycling of timber and paper products, particularly within NSW government departments and the Parliament of NSW.

We must not redesign the FCNSW or the NSW timber industry on the assumption that the community will want more of the same. Nor can we argue that more of the same, large volumes of sawn timber for low quality uses, can be produced even if that was what the community wants.

COMMUNITY EDUCATION AND INFORMATION

NEFA is committed to initiating a crucial discussion in the community on the levels of timber-derived product consumption with a view to motivating a reduction in consumer demand. That is, not to say that we are seeking to ban all timber derived products.

We are seeking instead to have people think about the high quality paper and timber products, which:

- * are bought at prices well below the actual costs of production;
- * are used once and thrown away, but may be reuseable or recyclable;
- * are non-essential to the maintenance of their quality of life;
- * have available environmentally benign substitutes;

We want people to take action to re-orient their patterns of consumption, to reduce their demand to levels which are more realistically attuned to the ability of the society, taking ALL factors into account, to produce these products.

In the case of some products, this process of consumer re-think may mean that certain products have little or no demand.

R.66 NEFA recommends that the NSW government encourage discussion and action by the community for the use, recycling and re-use of paper and timber products.

R.67 NEFA recommends that the FCNSW investigate and promote the manufacture of composite timber products to replace old growth, rainforest and imported timber.

Certainly, NEFA believes having the full cost of production, including the replacement of renewable resources, environmental studies and EIS's, et al, reflected in higher prices of products will be one way of provoking this rethink.

NEFA do not sway from this position. As a society, we must pay the full price for the products we use and make the industry understand that higher standards of environmental protection are required and will be for by the new wave of environmentally conscious buyers.

NEFA has been approached by the Forest Products Association to enter into dialogue and discussion on the future of the north coast timber industry given the implications of our campaign to protect 'old growth forests'.

We are prepared to have discussions with the industry to identify areas of agreement, disagreement and where more information is required.

Attempts have been made to have some informal discussion at the local level, though the local branches of the Forest (Industry) Protection Society has cancelled one meeting and failed to turn up at another. Further attempts at dialogue are being made.

We are also keen to provoke a critical evaluation of the type of industry which would fit the description of 'an ecologically sustainable timber industry'.

R.68 NEFA recommends that the NSW government encourage discussion and critical evaluation in the community about the type of industry which would fit the description of 'an ecologically sustainable timber industry'.

16. OLD GROWTH FORESTS AND GREINER'S 'NEW ENVIRONMENTALISM'

A Critique by Dailan Pugh, Far-North Coast NEFA Co-ordinator.

Summary

Greiner claimed a new Government initiative, yet he was forced to agree to EIS's because of NEFA's legal actions forcing FCNSW to comply with the Environmental Planning and Assessment Act.

Greiner attempted a media 'snow job' in a closed media picnic at a lookout in the Bellangry SF and relied on a Forestry Commission 'misinformation' kit riddled with errors.

The definition of 'old growth' forests used is perverse and inaccurate. Figures supplied were inaccurate guesses including forests other than 'old growth' forest,

Greiner announced 180,000 ha.s of 'old growth' forests in SF's would be subject to EIS's yet a breakdown of figures totals 169,000 ha., of which 12,000 ha. is not in SF but is Vacant Crown land and leasehold land.

Major 'old growth' forest areas were omitted or later dropped. A significant portion of the EIS areas fall into the 40% of SF "excluded" from logging.

Many parts of the EIS areas have already been either cleared, ringbarked, heavily logged or burnt out. FCNSW failed to check facts on 'old growth' forests in National Parks. It guessed.

Two EIS's were already nearly completed. A third 'quickie' EIS is being prepared for 3 Compartments of Chaelundi Sf, specifically excluded from the announcement.

Greiner announced an EIS for the Blackbutt Plateau in Nullum SF Premier which Neville Wran said in 1985 should be done.

Greiner's claim that the freeze covered "nearly ten times the area sought for consideration by leading conservationists" was clearly wrong. It was closer to five times a "first claim" only list drawn up in March 1990. *NO*

FCNSW left out significant areas of old growth forest in most Management Areas to be logged while EIS's were being done.

The only real initiative was the proposal to allow public participation, yet in the first test of this "initiative", the FCNSW failed to either consult with or inform the public, NEFA activists, or their solicitors.

Introduction

Old growth forests represent most of the least disturbed ecosystems remaining in NSW.

Those on fertile sites and more moderate slopes are of the most value to forest dependent wildlife, ~~which~~ are most poorly represented in reserves and most threatened by logging and road construction.

These old growth forests remain as scattered fragments, primarily on Crown lands available for logging. The Forestry Commission of NSW (FCNSW) is steadily roading, logging and increasing the fragmentation of these larger stands. Very little of these ancient forests will be left in their natural state by the end of this decade.

Legal obligations ignored by FCNSW

Since 1980, a series of cases in the NSW Land and Environment Court have established that FCNSW has a responsibility to abide by the requirements of Part V of the Environmental Planning and Assessment Act, 1979 (EPA Act).

This law requires that the FCNSW examine the environment which it manages and undertake thorough environmental assessments of likely impacts before allowing any degrading activities to occur. If the impacts of the proposed works are found to be significant, or likely to be significant, FCNSW must prepare a formal Environmental Impact Statement (EIS).

Because the FCNSW was still unwilling to fulfill its legal obligations under the EPA Act, and prepare EIS's before logging or roading in old growth forests, the North East Forest Alliance commenced a series of strategic legal actions. These legal actions have concerned forests throughout the north east of NSW and have aimed, and succeeded, in compelling FCNSW to comply with the law.

Greiner announcement attempts a media 'snow job'

On the 24th June, 1990, Premier, Mr Nick Greiner launched the FCNSW's strategy titled "Meeting the Environmental Challenge, A Forest Strategy", in a closed media picnic at a lookout in the Bellangry State Forest, near Wauchope.

He stated that

"180,000 hectares of timber in 14 old growth forests would be the subject of environmental studies - nearly ten times the area sought for consideration by leading conservationists".

Premier Greiner pointed out that

"3.6 million hectares of old growth timber is located within the boundaries of National Parks or State Forests - the 2 million hectares in the Parks are protected and 1.3 million hectares in State Forest are excluded from logging, leaving only 0.3 million hectares regarded as essential to sustain timber production".

Forestry Commissions 'misinformation' kit riddled with errors

In preparing this statement and supporting media briefing kits, FCNSW used a definition of 'old growth' forests based on "forests with little or no disturbance". They claimed that there is 1.6 million ha. of such forests within State Forests of which 1.3 million ha. (40% of SF's) are excluded from logging & 0.3 million ha. (9% of SF's) are scheduled for logging.

FCNSW made further claims of an additional 3.4 million ha. of 'old growth' forests on other lands (see Table 1) and stated that 100,000 ha. of old growth forest was transferred from State Forests to National Parks as a result of the 1982 Rainforest decision.

Table 1.

Breakdown of FCNSW 'old growth' forest figures (ha.s x 1,000)

	National Parks & Res	State Forests	Other Crown Lands	Private Lands	Totals
X Forested Area	2,216	3,244	4,302	5,197	14,959
X Little / No ² Disturbance	2,000 90%	1,600 49%	1,100 26%	300 6%	5,000 33%
X Logged and ² Regenerated	?	1,500 46%	?	?	?

1. Department of State Development (1989) 'Pulp and Paper Industry Task Force Report'
2. FCNSW (1990) 'Meeting the Environmental Challenge, A Forest Strategy'

The figure of 1.3 million ha. of State Forest excluded from logging is based upon an assessment done some years ago by FCNSW which estimated that some 40% of SF's were generally 'unloggable'. These forests were comprised of poor and steep forests, logged and unlogged rainforests, burnt out forests, Flora Reserves (which also encompass logged areas), protected water catchments and narrow filter strips retained along some streams.

Figures supplied were inaccurate guesses

This assessment is highly questionable, and there can be no doubt that the 1.3 million ha. figure encompasses forest other than 'old growth' forest, even using the FCNSW inaccurate and misleading definition.

As part of the 300,000 ha.s "essential to maintain timber production" Premier Greiner announced that 180,000 ha.s of the North Coast's 'old growth' forests in SF's would be subject to EIS's. Yet the detailed maps and breakdown of figures provided by FCNSW only total 169,000 ha., of which 12,000 ha. is not in SF but is Vacant Crown land and leasehold land (e.g. Willi Willi in the Kempsey Management Area).

Major forest areas omitted or later dropped

The majority of the 982 ha. in Compartments 430 and 431 of Mount Marsh SF will "possibly" be logged without and EIS being first completed and considered - despite the fact that these areas were included in Greiner's freeze.

Parts of Riamukka and Tuggolo SF's were shown on the original map released by Premier Greiner but were subsequently dropped, as was the Jenner SF. X

Further, a significant portion (40%?) of the EIS areas fall into the 40% of SF "excluded" from logging.

In addition, many parts of the EIS areas have either been cleared (e.g. Mount Marsh, Dalmorton, Glen Nevis SF's); ringbarked (e.g. Mount Marsh, Dalmorton, SF's); heavily logged (e.g. Richmond Range, Yabbra, London Bridge SF's and Willi Willi) or burnt out (e.g. Boonoo SF).

Forestry Commission fails to check facts on National Parks

The FCNSW claim that the area transferred to National Parks as a result of the 1982 'Rainforest decision, is all old-growth forest is obviously wrong, as a large percentage had already been logged (e.g. the now Nightcap, Border Ranges, Washpool N.P.'s) or otherwise heavily disturbed.

Further, it must be noted that the FCNSW made no attempt to consult with the National Parks and Wildlife Service (NPWS) in determining the status of forests within National Parks and the Commissions figure for NP's was simply a guess.

FCNSW's figures for other Crown lands and private property were based on a 1971 inventory that is long overdue for major revision, and probably needs to be completely redone. X

'Freeze' while EIS prepared not relevant or effective

The 'freeze' announced by the Premier, covers parts of some 42 State Forests, some Vacant Crown lands and leasehold land in 15 FCNSW Management Areas in north eastern NSW. The 'freeze' lasts only as long as it takes to complete the EIS's

Two EIS's were already nearly completed at the time of the announcement (Dome Mountain, known as Duck Creek to FCNSW, and Ben Halls Gap SF) and are due for public exhibition in the near future.

A third 'quickie' EIS is now being prepared for 3 Compartments (Nos. 180, 198, & 200) of the Chaelundi SF, despite the fact that these 3 compartments were specifically excluded from the Premier's announcement. No attempt has been made to commence an EIS for the areas of Chaelundi announced by the Premier. X

An EIS for the Blackbutt Plateau in Nullum SF near Mullumbimby was also announced by Premier Greiner, despite the facts that the Ombudsman found that the FCNSW was "wrong" in not completing an EIS when it illegally built Nevasae Road in the early 80's, and that the then Premier Neville Wran agreed that an EIS was required in 1985 and gave an undertaking that such an EIS would be done.

Claims of 10 times area sought by conservationist wrong

X Mr Greiner's claim that the freeze covered "nearly ten times the area sought for consideration by leading conservationists" was also clearly wrong, since NEFA activists had already forced the FCNSW to prepare EIS's for 8% of the 'freeze' areas (~~Mount Royal SF~~), legal proceedings were underway for a further 17% of the areas (~~Chaelundi SF~~) and court actions were being prepared for the majority of the remainder. ?

X In March NEFA identified a preliminary list of 29,000 ha of old growth forest, ^{within a much larger area of forest} for which it wanted EIS's prepared, and formally advised the FCNSW, Minister for the Environment and Minister for Planning of the requirement for EIS's. On any calculation, a claim of 10 times is a gross exaggeration.

In determining which areas to include in the 'freeze' FCNSW deliberately left out significant areas of old growth forest in most Management Areas to be logged while EIS's were being prepared. It appears that many forests left out for this purpose, represent some of the highly evolved parts of the forests with the greatest conservation values (e.g. Mount Marsh, Chaelundi SF's). These omissions appear to be a blatant attempt by FCNSW to avoid their clearly established legal obligations.

X While Premier Greiner's announcement was claimed to be a new Government initiative, it is clear that the announcement was an attempt to characterise a necessity as a virtue, since the government was being forced to agree to EIS's because of NEFA's legal actions. Even then FCNSW intended to continue to illegally log in many areas. ^{new} *with Government compliance.*

Public consultation an initiative - but not implemented

The only real initiative was the proposal to allow public participation, by requiring the FCNSW to go to the community and seek their assistance in determining the scope of the EIS's, and the issues that will be addressed in them.

X Yet in the first test of this "initiative", the FCNSW failed to either consult with or inform the public, let alone NEFA activists, or their solicitors, that it was preparing an EIS for 3 compartments in Chaelundi SF. This EIS is ^{new} to be a "quickie", ^{cheap} "cheapie" EIS, the first draft of which ^{was due} is to be completed by 3 September!

X It was only by chance that NEFA found out that a consultant, S.R. Margules and Partners, has been employed to prepare the EIS, and it was only after reminding the Dorrig District Forester, Mr John Bruce ^{Murray} of the FCNSW's new strategy, announced by the Premier, that he agreed to allow NEFA to have an input into the scope of the issues to be addressed in the EIS.

The consultant has given NEFA activists until the 24th August to make submissions and no adequate attempt has been made to allow other members of the public to have input. Clearly there is inadequate time for NEFA to consult with relevant experts and make adequate assessment of the factors

warranting consideration.

Timetable for Chaelundi too short - a "quicke cheapie" EIS

Further, this hasty approach in preparing the EIS provides inadequate time for the consultant to consider and undertake the detailed work needed to address the issues raised by NEFA.

Future requirements for rational decisions on forests

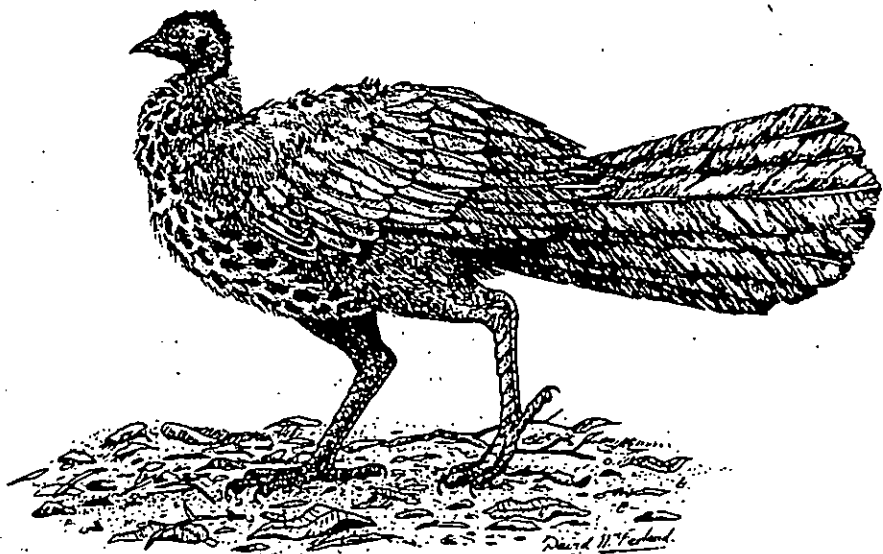
What is required now is for the FCNSW and NPWS to undertake a complete, exhaustive inventory of all old growth forests remaining, delineated by forest associations, site fertility and steepness of sites.

All areas thus identified should be subject to detailed and standardised surveys of flora, fauna (both vertebrate and invertebrate), geology, hydrology, archaeology, cultural and visual values as well as assessments of the soil type, stability and erosion potential, and stream disturbance and water quality impacts.

Research needs to be done to determine the special attributes of old growth forests and the adequacy and representativeness of the existing reserves system.

Only when these minimum requirements have been fulfilled can any rational decision on the future of these forests be made.

. Dailan Pugh, August 1990.



Brush Turkey

17. SUMMARY OF RECOMMENDATIONS

R.1 NEFA recommends, as a bare minimum, management for wildlife conservation and protection by FCNSW should include the retention and return of adequate numbers of hollow bearing trees and potential replacements throughout forests.

R.2 NEFA recommends a reduction in fire frequency to a more natural level.

R.3 NEFA recommends that management of State Forests should aim at preserving and restoring natural species composition and community structure of plants and animals throughout the forest estate.

R.4 NEFA recommends that the acceptance of this role, managing to protect a range of forest values including wildlife conservation and protection, and its incorporation into legislation governing FCNSW are key components of the re-orientation of the FCNSW towards becoming a modern relevant government agency.

R.5 NEFA recommends that such an opportunity for blocking conversions and dedicating lands ought to be extended to the NPWS for the purposes of forest conservation and protection in National Parks and Nature Reserves.

R.6 Were this right extended to NPWS, NEFA recommends that the Service should have first 'pick' of the lands, since forest conservation is a high priority use than timber production.

R.7 NEFA recommends that these provisions be fundamentally rethought and the Act amended to permit the retention of forests, and their release from profit a prendre for wildlife habitat, water quality maintenance, soil conservation and other purposes.

R.8 NEFA recommends a moratorium on the conversion to freehold of lands with high conservation values.

R.9 NEFA recommends the application of Conservation Agreements, under Section 69 of the National Parks and Wildlife Act, to freehold land of high conservation value as an alternative to 'profit a prendre' plunder.

R.10 NEFA recommends that a process for resolving land use conflicts between FCNSW and NPWS along ecological principles be devised and operated.

R.11 NEFA recommends all areas currently within Flora Reserves or Forest Preserves should be removed from the control and management of the FCNSW, dedicated as Nature Reserves under the NPW Act. Major increases in funding must be made to NPWS to permit their appropriate management by the Service.

R.12 NEFA recommends that logging and other damaging activities are excluded from all old growth forests while they are under comprehensive evaluation, to ascertain their

suitability for dedication to the NPWS.

R.13 NEFA recommends that additional areas be withdrawn from timber production to allow a comprehensive and adequate system is to be established and maintained.

R.14 NEFA recommends that species be represented in NPWS reserves across their full range of distribution, with populations maintained at sufficient levels to allow for continued evolution in the wild.

R.15 NEFA recommends a moratorium on any detrimental activities, or adverse changes in land tenure, in any areas already nominated for Reserve status or identified as having high conservation significance while comprehensive surveys and assessments are undertaken.

R.16 NEFA recommends immediate action be taken to gazette National Parks over lands the subject of Reference Statements by the NPWS.

R.17 NEFA recommends a complete and thorough investigation of forest values and the public release of resultant information of these values, be pursued as an urgent priority, by independent researchers funded by the NSW Government.

R.18 NEFA recommends that the results of these surveys be utilised in the design of an adequate and comprehensive Reserve system capable of allowing for predicted future climatic changes.

R.19 NEFA recommends an immediate review be carried out by independent consultants on the impact that the establishment of an adequate Reserve system will have on the NSW timber resources and timber industry.

R.20 NEFA recommends the FCNSW adopt the classification by the Ecological Society of Australia of Brush Box as a rainforest species and that forest type maps be prepared for all forest areas based on ecological, and not commercial, parameters

R.21 NEFA recommends an immediate end to any form of rainforest logging through the removal of all rainforests from timber production and their preservation in secure reserves.

R.22 NEFA recommends that further degradation of the few remaining Wilderness Areas and areas nominated for Wilderness dedication be excluded from timber production and other modifying activities while these areas are assessed by the NPWS.

R.23 NEFA recommends that research work on trial plantations be collated and/or carried out and the information released to the public.

R.24 NEFA recommends that all Management Areas be required to make and maintain adequate records of logging and fire history.

R.25 NEFA recommends that FCNSW release information on state forests into the public domain.

R.26 NEFA recommends that the Forestry Act's objects be reviewed and modernised in line with Boer and Prestons' suggestions.

R.27 NEFA recommends that FCNSW be reconstituted and a larger multi-disciplinary Board of Commissioners with ecological expertise be appointed.

R.28 NEFA recommends that internal FCNSW committees be immediately established and appropriately funded to: review scientific research, environmental investigation and impact assessment, monitor and enforce compliance with the provisions of the Forestry Act and other Acts, research and develop native hardwood species plantations, review and update the Indigenous Forest Policy, 1976 and the Exotic Softwood Plantation Policy, 1982, and formulate new policies as appropriate.

R.29 NEFA recommends that these existing and proposed committees should provide copies of their terms of reference and summary reports of their activities within the body of the Annual Report.

R.30 NEFA recommends that FCNSW should not make decisions to close a forest on political grounds, to permit illegal activities by the FCNSW or its licencees or to prevent the appropriate public scrutiny of a public authority administering public lands in the public interest.

R.31 NEFA recommends that where a forest closure is necessary for reasons of safety:

- * a Public Notice should be inserted in a newspaper circulating within the District, advising of the area, period and reason for closure. Such a Notice should be accompanied by an adequate map and be signed by an authorised FCNSW staff member.
- * a Notice capable of being read from the public road should be installed at the intersection of roads which lead to the area of forest closed. That Notice should contain the information described above.

R.32 NEFA recommends that FCNSW avoid excessive costs for police protection by abandoning controversial policies and actions which are not consistent with reasoned, independently scientifically validated opinion.

R.33 NEFA recommends that FCNSW accept and comply with the broad range of legislation which applies.

R.34 NEFA recommends that the requirement for ten year plans and five year reviews needs rigorous application and enforcement.

R.35 NEFA recommends that Annual Reviews be made more

comprehensive and released to the public.

R.36 NEFA recommends that a thorough review of all existing PMP prescriptions be undertaken urgently by independent scientists funded by the NSW Government.

R.37 NEFA recommends that recommendations for additional appropriate PMP prescriptions be prepared urgently by independent scientists funded by the NSW Government.

R.38 NEFA recommends that the Standard Erosion Mitigation Conditions be thoroughly reviewed, particularly in reference to slopes greater than 25 degrees (which should also be considered for exclusion from logging), and the reviewed SEMC given statutory effect through incorporation within the Forestry Regulation and made binding on the Crown.

R.39 NEFA recommends that FCNSW incorporate the costs of complying with the EPA Act, including the cost of preparing EIS's into its royalties charges.

R.40 NEFA recommends that FCNSW voluntarily and consistently comply with Part V of the Environmental Planning and Assessment Act, 1979.

R.41 NEFA recommends that PAC enquire into the costs of defending and settling the court actions named above.

R.42 NEFA recommends that cattle and bee grazing be excluded from forest areas which possess significant natural values.

R.43 NEFA recommends that standard field management practices be adopted and consistently applied.

R.44 NEFA recommends that no 'trade-offs' of these global issues: maintenance of biological diversity and reducing the impacts of the Greenhouse Effect; are made but both issues appropriately addressed.

R.45 NEFA recommends that FCNSW adopt a definition of sustained yield consistent with providing a range of products, in sizes and species, in perpetuity.

R.46 NEFA recommends that FCNSW should immediately implement a sustained yield policy, recognise that sawlogs cannot be supplied in the sizes, species and volumes of previous years, and act immediately to reduce and redirect timber demand.

R.47 NEFA recommends that the Public Accounts Committee closely investigate the practice of selling timber resources capable of higher value uses for a low value product.

R.48 NEFA recommends that all NSW forest products be processed to the maximum possible value provided that the processing is consistent with adequate environmental protection standards.

R.49 NEFA recommends that encouragement should be given to high employment generating and low resource demanding industries.

R.50 NEFA recommends a complete reassessment of the uses-current and potential - of small timber, increased research into its use in composite timber products, and incentives for the establishment of localised industries to utilize this resource.

R.51 NEFA recommends that the Forestry Commission should immediately cease the clearance of native vegetation for plantation establishment, restrict exotic pine plantings to already established pine plantation areas, and instigate mixed native species plantations.

R.52 NEFA recommends that the Public Accounts Committee enquire into FCNSW's relationship with the timber industry, seek ways of increasing the Commission independence and recommend ways for the Commission to distance itself from the industry it regulates.

R.53 NEFA recommends that, if the industry is to survive this hiatus and emerge as an appropriate and efficient industry in the 21st century, major changes and restructuring will be required.

R.54 NEFA recommends that the PAC consider a process for focussing the options for transition away from old growth forest logging towards timber production based on plantations and value added timber products from regrowth forests; and explore opportunities for providing incentives for timber companies to take up these options.

R.55 NEFA recommends the amendment of the Forestry Act, 1916 to incorporate a range of public participation procedures to assist in better forest management and greater public accountability.

R.56 NEFA recommends that the FNSW's financial operations be structured so as to provide funds sufficient to meet requests for information from the public.

R.57 NEFA recommends that FCNSW not manipulate the FOI Act or other information provision processes to price information beyond the reach of members of the public.

R.58 NEFA recommends that PAC investigate whether the FCNSW recent profits cover all costs associated with timber production.

R.59 NEFA recommends that all environmental costs are included in financial accounts.

R.60 NEFA recommends that in setting timber royalties, the costs of undertaking detailed environmental assessments and compensation for the resultant environmental degradation should be taken into account.

R.61 NEFA recommends that the PAC enquire into the costs to local councils and state government from damage caused by logging trucks to road pavements and bridges, the desirability of the recovery of these costs from increased

royalties and the allocation of these monies to authorities which incur the additional costs of maintenance.

R.62 NEFA recommends that PAC give consideration to recommending banning the importation of rainforest and old growth timber and their use in NSW government funded buildings.

R.63 NEFA recommends that the imposition of an environmental tax on imports, with revenue being channeled into environmental protection and rehabilitation in the country of origin, be given consideration.

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R.68 NEFA recommends that the NSW government encourage discussion and critical evaluation in the community about the type of industry which would fit the description of 'an ecologically sustainable timber industry'.

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TOPOGRAPHY OF NORTHEASTERN N.S.W.

Figure 1.

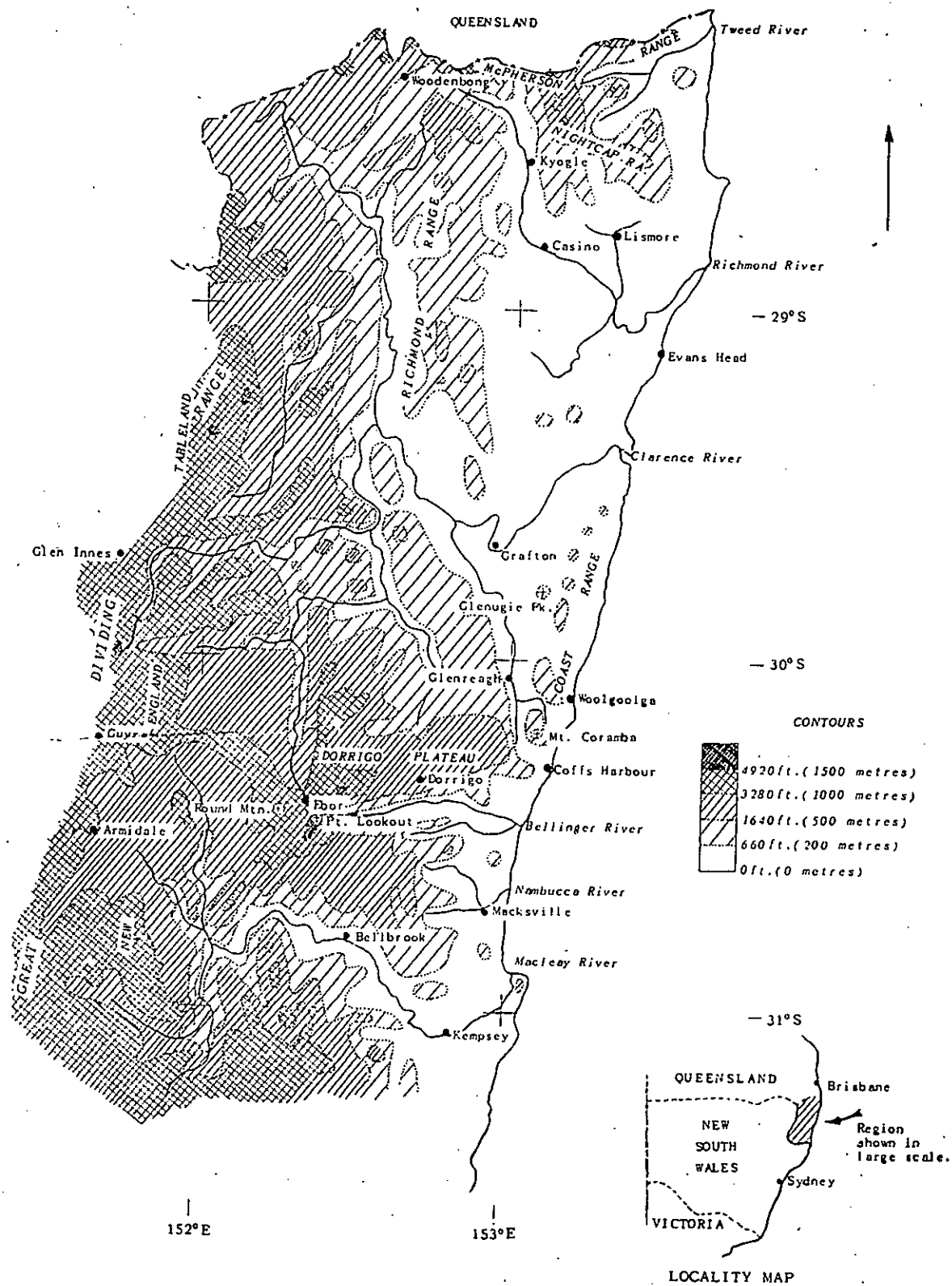
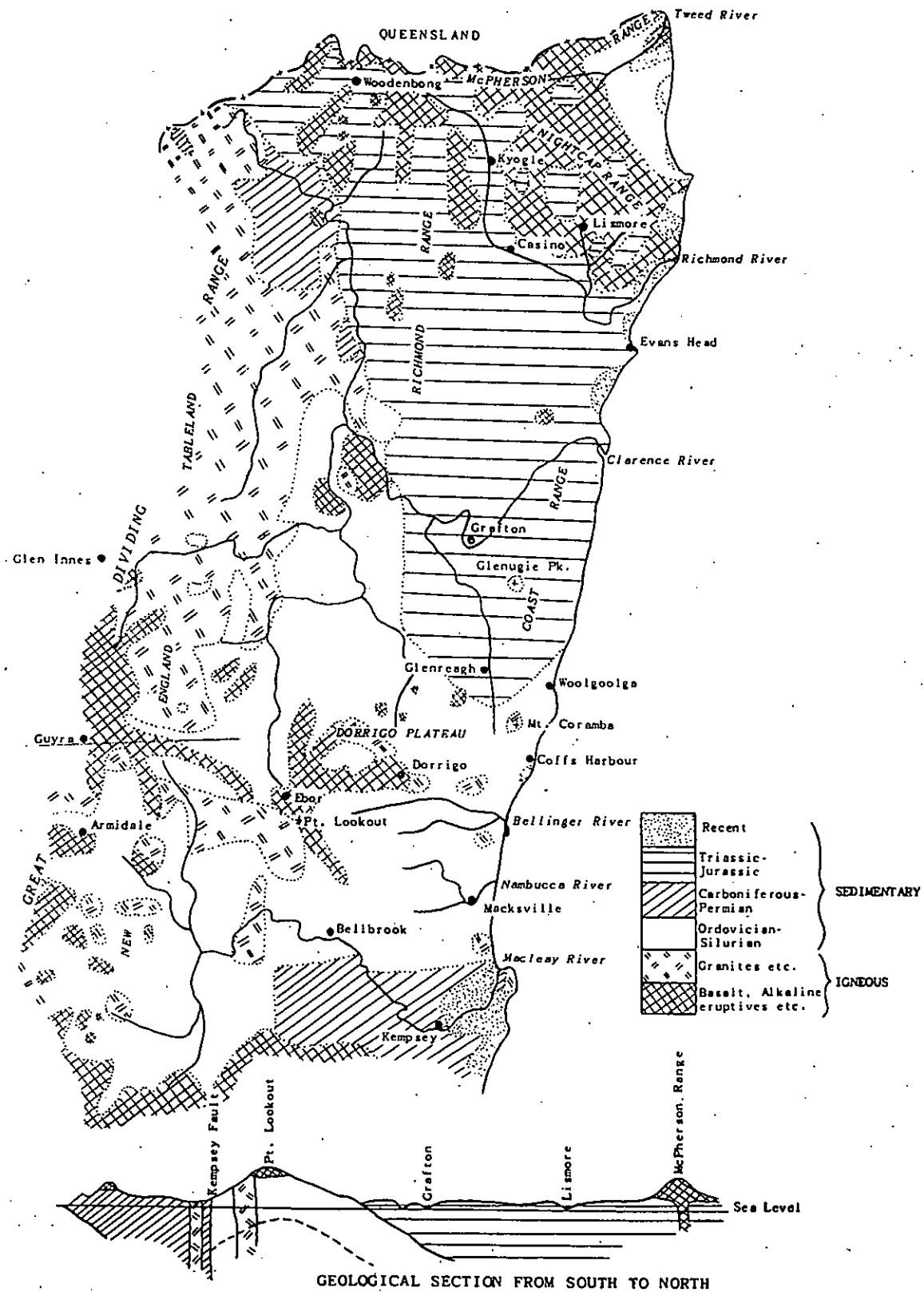
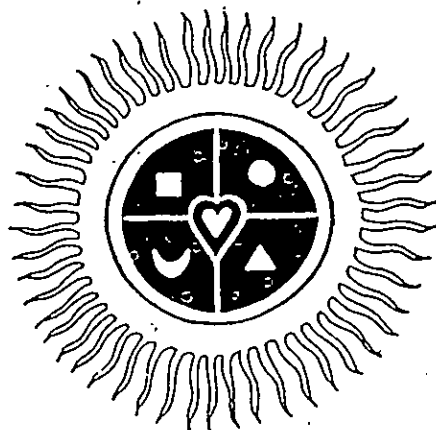


Figure 2.







National Parks and Wildlife Service



NORTHERN REGION

N.S.W. Government Offices
49 Victoria Street
P.O. Box 97
Grafton, N.S.W. 2460

Mr A Steed
Big Scrub Environment Centre
88 Keen Street
LISMORE NSW 2480

Our reference: GM:DMH

Your reference:

Telephone: (066) 42 0593
Facsimile: (066) 42 0619

24 October 1990

Dear Andrew,

This is a belated follow up to my note of 27 July 1990 which accompanied information on NRCP projects proposed for supplementary funding in 1990/91.

I understand that conservationists were meeting during August at which the extensive information supplied would be considered. I then expected the next consultative meeting on future NRCP projects would be arranged during late August/early September.

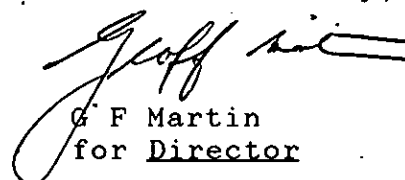
I was also seeking written confirmation from the conservation movement such as the National Parks Association and the North Coast Environment Council that the membership at our first meeting was considered representative.

In the interim, work is continuing on uncompleted and funded projects such as the Big Scrub Remnant Rehabilitation, the Dorrigo Rainforest Centre, Coocumbar Island Rehabilitation and interpretative signs and displays. Advice on the 1990/91 project list is with the Federal Government, together with an indication from NSW to continue the National Rainforest Conservation Program.

Our next meeting should be held as soon as possible to identify and list future rainforest projects.

I look forward to your early advice.

Yours Faithfully,


G F Martin
for Director

f/w used for cross arms for telephone
poles & masts in Japan
• Not sustainable, royalty, dubious use
• Boral mill is taking timber from
Chaelundi, from 6 drivers. 2 are
woodchipping. ∴

secs of RRWE in CWA annual
management report. NPWS believe have
discovered new
pseudomys - near bandooze? Steve
Phillips. Only found in dingo skulls.
Not caught live.

Don't want legal action, but
want it to be redone!

?
Department of Arts, Sport, Environment,
Territories and Tourism,
GPO Box 787
Canberra, A.C.T. 2601

Copy to Tony Fleming
send direct to head
of NRCP, Nat Res -
Sue will put name on
fax re chaelundi
Andy Turner

Dear Sir?,

National Rainforest Conservation Programme
Projects Proposed N.S.W. N.P.W.S. Northern Region

The N.C.E.C. understands the N.P.W.S. has forwarded a 1990/91 Project List to the Department. We wish to clarify that the N.C.E.C. are unable to offer support to the projects proposed at this stage.

At a recent meeting between representatives of N.P.W.S., N.C.E.C., North East Forest Alliance and the Rainforest Information Centre a number of our concerns were raised principally concerning the priorities used by N.P.W.S. to develop projects.

Previously N.P.W.S. has failed to consult with local conservation groups until required to do so, which has hampered our ongoing involvement in the identification of priorities and suitable projects.

Recently N.P.W.S. released a document detailing some spending of funds allocated under the N.R.C.P. The N.C.E.C. believes the Northern Region N.P.W.S. N.R.C.P. Accounts should be independently audited to verify allocation and subsequent expenditure on each project and if N.P.W.S. has followed Federal procedures.

The Lismore office of the N.P.W.S. has recently received additional funding under the N.R.C.P., in the vicinity of \$80000, and is hiring staff and proceeding with projects to which North Coast conservation groups have not agreed.

Obviously, we will endeavour to meet again with N.P.W.S. to discuss our concerns in the near future, but presently cannot offer support to the project list submitted relating to the N.P.W.S. Northern Region (N.S.W.)

Yours blah,

copies Newell, Nan Nicholson, Jim Tedder, John Corkill, Harry Woods/. Moore,

no confidence
no dialogue
head office rep
needs: not yet.

✓. moore + gilodoy.
+ exec officer of NPA

420. ↓

PO Box A96
Sydney South
NSW 200

add:-

no confidence in G.M
needs Head Office
co-ordination.

copy of
letter to
people at meeting

- hi density of arboreal mammals
 - highest in NSW 1250/km²
 - 700 next in washpool

- results show density 650 near area

- gross inadequacy of data of arboreal
 - apparently misused

- selective use of data

- misleading information

- no attempt to show all all info presented.

- time to start - tony norton.

- Brathwaite's result not used.

- Norton, Recher, ~~Recher~~ not printed.

- No use of leilospisma zia. { ^{cutate} beech + s/f Rf.

- * • flat rate - another press release.

- target advocate - political line
 - national party west resign.

- tallawood - unsustainable ~~be~~

- in sydney, local retailer

- tallawood 1.25 x price. others
 - unsens and gural h/w, t/w is twice
 - \$600 → \$1200

(4) Circulate minutes of last meeting

- ① amongst green attendees
- ② ~~at~~ to NPWS

locate in ? & files



(b) Write to feds - non support of 1990/91 project list from NSW NPWS with them.

— why we haven't gone that far in negotiations eg problems with NPWS

^{lost minute} priorities (still existing) previous lack of consultation with greens, problems with accountability of NPWS funds to projects.

(we would like an ^{indep audit & invest} inventory of ^{with any NPWS NRCP} ~~its~~ ^{how} files

to ^{how} much \$ was spent on ^{each} ~~which~~ project, if this ^{to} verify was in ~~it~~ accordance with ~~the~~ Federal procedures, eg. Guy now employed.

? if that's Hughes

o him if he's doing anything on Ballina slipways.

PRESS RELEASE PRESS RELEASE PRESS RELEASE PRESS RELEASE PRESS

GREENS CALL ON SPCC TO EXTEND NOTICE ON CONTAMINATED AIRPORT SOIL

THE LISMORE GREENS TODAY HAVE LODGED A FORMAL COMPLAINT TO THE SPCC TO HALT THE USE BY TRUCKS OF A RAMP LEADING TO THE FLOOD PAD AT THE LISMORE AIRPORT.

ACCORDING TO COUNCIL OFFICERS, THE RAMP LEADING TO THE FLOOD PAD IS THE POSITION WHERE THE CONTAMINATED SOIL DUMPED FROM THE MODANVILLE TIP HAS BEEN BURIED.

AT PRESENT THE FLOOD PAD IS BEING USED AS A STORAGE SITE OF MATERIAL FOR THE PRESENT AIRPORT UPGRADING.

FURTHER PLANS BY THE COUNCIL IS THAT CONCRETE FOR THE NEW TARMAC WILL BE MIXED ON THE PAD AND TAKEN OVER TO THE RUNWAY SITE WHEN THE PRESENT CONSTRUCTION WORK HAS BEEN COMPLETED.

THE SPCC HAS SERVED A NOTICE UNDER SECTION 35 OF THE ENVIRONMENTAL HAZARDOUS CHEMICALS ACT ON THE COUNCIL TO PREVENT REMOVAL OR DISTURBANCE OF ANY OF THE CONTAMINATED SOIL WITHOUT PROPER AUTHORISATION.

THE LISMORE GREENS LODGED THEIR COMPLAINT WITH THE ASSISTANT REGIONAL DIRECTOR, NEWCASTLE-NORTH COAST REGION OF THE SPCC, MR SMITH.

THE COMPLAINT HAS POINTED OUT TO THE SPCC THAT THE NOTICE SERVED ON COUNCIL WAS ON THE UNDERSTANDING THAT "THE SOIL WAS USED IN THE CONSTRUCTION OF A RAISED PARKING AREA TO STORE AIR CRAFT DURING FLOOD PERIODS".

MR JAMES HILL, SPOKESPERSON FOR THE LISMORE GREENS, REVEALED TODAY MEMBERS FROM THE GREENS AND OTHER ENVIRONMENTALISTS INVESTIGATED THE RAMP YESTERDAY AND HAVE FOUND THAT THE EDGES ARE ALREADY SHOWING SIGNS OF FEATHERING AND EROSION.

"WE HAVE MADE ENQUIRIES TO THE CHIEF ENGINEER, MR MOOREHOUSE, AND HAVE BEEN INFORMED THAT THE RAMP WILL BE USED TO CARRY OVER 2,000 TRUCK MOVEMENTS IN THE NEXT FOUR WEEKS.

"WE ARE EXTREMELY CONCERNED THAT THE DDT AND ARSENIC WILL BEGIN TO ESCAPE INTO A MAJOR DRAINAGE SYSTEM ONLY TWO METRES FROM THE CONTAMINATED SITE."

THE GREENS WILL BE ATTENDING A MEETING ON MONDAY MORNING WITH THE SPCC, OFFICERS OF THE COUNCIL, DEPARTMENT OF AGRICULTURE AND OTHER INTERESTED RESIDENT GROUPS AT THE AIRPORT.

FURTHER ENQUIRIES JAMES HILL 21 2677.



C/- Big Scrub Environment Centre
88a Keen Street
Lismore 2480
16:11:90

Dear 

Re: National Rainforest Conservation Programme
Projects Proposed N.S.W. N.P.W.S. Northern Region

The North Coast Environment Council (NCEC) understands the National Parks and Wildlife Service (NPWS) has forwarded a 1990/91 Project List to the Department. We wish to clarify that the NCEC is unable to offer support to the projects proposed at this stage.

At a recent meeting between representatives of NPWS, NCEC, North East Forest Alliance (NEFA), National Parks Association (NPA) and the Rainforest Information Centre (RIC) a number of our concerns were raised principally concerning the priorities used by NPWS to develop projects.

Previously NPWS has failed to consult with local conservation groups until required to do so, which has hampered our ongoing involvement in the identification of priorities and suitable projects.

Recently NPWS released a document detailing some spending of funds allocated under the NRCP. The NCEC believes the Northern Region NPWS NRCP Accounts should be independently audited to verify allocation and subsequent expenditure on each project and if NPWS has followed Federal procedures.

The Lismore office of the NPWS has recently received additional funding under the NRCP, in the vicinity of \$80000, and is hiring staff and proceeding with projects to which North Coast conservation groups have not agreed.

Obviously, we will endeavour to meet again with NPWS to discuss our concerns in the near future, but presently cannot offer support to the project list submitted relating to the NPWS Northern Region (NSW.)

It would be appreciated if you could acknowledge the receipt of this letter and indicate what action will be taken to rectify a wholly unsatisfactory situation,

Yours sincerely,



Andrew Steed,
For Jim Tedder, Secretary.

F048

COOCUMBAC ISLAND NATURE RESERVE

1) Rainforest Regeneration Programme

Report by M. Dodkin, Project Officer (Naturalist)

29.6.90

2) National Rainforest Conservation Programme

Report by S. Luscombe, Ranger

29.6.90

PORT MACQUARIE DISTRICT.

Northern Region copy



NATIONAL PARKS AND WILDLIFE SERVICE

F.048

COOCUMBAC ISLAND NATURE RESERVE NATIONAL RAINFOREST CONSERVATION PROGRAMME

I have had primarily an administrative involvement on Coocumbac Island for two and a half years. The temporary park workers have extensive experience in rainforest regeneration and are able to work with minimal supervision.

Mike Dodkin has been instrumental in the scientific approach to the regeneration work. The past three years have seen a major advancement in returning the island to floodplain rainforest, to the stage where the area which is under the canopy needs only periodic maintenance. However, outside the canopy (about one third of the island), consistent work is needed to reduce weed invasion and maintain cover crops. This is particularly true after the flood, which occurred in February, 1990.

Funding is required to maintain the consistent and dogged approach to regeneration works and to ensure the survival of the Coocumbac Island rainforest. A break in work at this stage of the project would be undesirable, particularly considering the impact of the recent flood (for details see M. Dodkin's report attached).

The three temporary park workers have been with the project since inception and are keen to continue. Two have manipulated other employment to continue the one-day-a-week schedule. This situation may be threatened if there was to be a lay-off until NRCP funding was assured. A suggested solution is to use funds from another area until NRCP funds became available, and to then reimburse this account.

A Regional inspection may be appropriate at this stage. A visit by conservation groups may also provide the project and the Service with much needed support and approval.

Susan Luscombe

Susan Luscombe
Ranger
Port Macquarie District

29th June, 1990

Superintendent, Port Macquarie
Regional Manager, Northern Region



NATIONAL PARKS AND WILDLIFE SERVICE

F.048

COOCUMBAC ISLAND NATURE RESERVE - RAINFOREST REGENERATION PROGRAMME

The second National Rainforest Conservation Programme (NRCP 2) is close at hand with funding conditionally approved. Whilst this report has been in the pipeline since the floods earlier this year, it is opportune to present this update report on the project at Coocumbac Island Nature Reserve.

Early February this year saw the inevitable periodic flooding of the Manning Valley, the last being in 1978. Both Coocumbac Island and the Wingham Brush have been anticipating this event in order to observe the impact on the current rainforest regeneration projects. The Wingham Brush project is into its 9th year, whilst Coocumbac Island is reaching its 3rd. Both operate on part-time employment programmes with Wingham Brush on 1/2 day/week and the Island on 1 day/week. The latter requires a full day to cater for operational needs of boating to and from the island and transporting of gear as opposed to Wingham Brush which is mainland based.

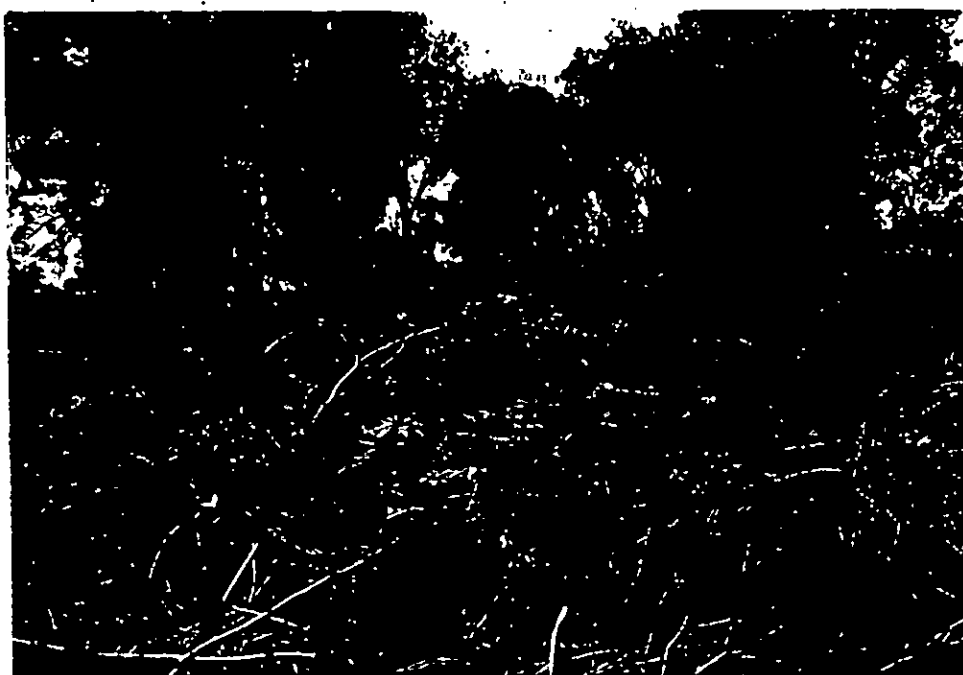
The results of the flood are interesting and suggest a directional change of strategy for floodplain rainforest regeneration projects. Two aspects have focused our attention:

- 1) flood energy impact
- 2) species flood tolerance



9.2.90 First inspection following the
flood — southern end of island.

This recent flood was of short duration, but of far greater energy than the previous 1978 flood. Peak heights existed for approximately one day as opposed to three in 1978. Floods heights covered both the Brush and the Island albeit this last being 1 metre below the 1978 level. Damage occurred in both areas and several observations are relevant.



(2)

9.2.90 Tobacco Bushes in low, exposed areas of the island. subject to waterlogged conditions for several days.

The Brush was well advanced in its regeneration programme and 'shade' cover crop plants (Tobacco Bush), to assist early establishment of rainforest seedlings, are currently being phased out. On Coocumbac Island this main traditional shade species is still currently under establishment in new sites. However, Tobacco Bush cannot tolerate prolonged waterlogged conditions.

At Wingham Brush damage occurred to fencing and regeneration sites, and while some Tobacco Bush has been killed most native regeneration survived and has now been pruned and will recover well. In contrast sites of Tobacco Bush establishment on Coocumbac Island subject to the full force of the flood and affected by inundation for its duration have been damaged where inundation and waterlogged conditions extended for several days.

However, while Tobacco Bush has been affected in low areas, others in less prone sites have managed to survive. I suggest simply because the flood was of short duration and hence slightly higher areas were only inundated for the one day. Many other aspects of the programme survived the flood, including 'wildlings' that have been germinating over recent months, particularly Native Hackberry and Rosewood. These have been relocated and staked with "grow-tubes" and are progressing extremely well under the pursuing hot and wet conditions in sites where Tobacco Bush has survived. Others exposed in damaged areas are fast disappearing under rampant regrowth of Madiera Vine (*Anredera cordifolia*) and Balloon Vine (*Cardiospermum grandiflora*). The control of these weeds is a major thrust of the project for the next 6 months (funding forthcoming).



9.2.90 Tobacco Bushes which survived the flood along the eastern side of the island. The main rainforest area in background.



(4)

2.2.90 'Wildlings' - young seedlings of rainforest plants now establishing under the canopy of Tobacco Bush. This was just prior to the flood. Dispersal is by birds.



(5)

9.2.90 After the flood. The above 'wildlings' and other nursery-planted stock survived the flood with no major damage.



virtually all of the
rain forest plantings
survived the
flood. Native Olive
- *Olea paniculata*

(6)

Immediately after
the flood and then
2 months later. Rain
combined with
warm weather has
encouraged rampant
weed growth - nursery
stock and seedlings
have disappeared.
The loss of the shade
canopy of Tobacco
Bush has also
assisted this growth
phase.

9.2.90



(7)

Relocation of plants,
weed control and
restaking seedlings
has been a major
thrust of the regeneration
programme since
the flood.

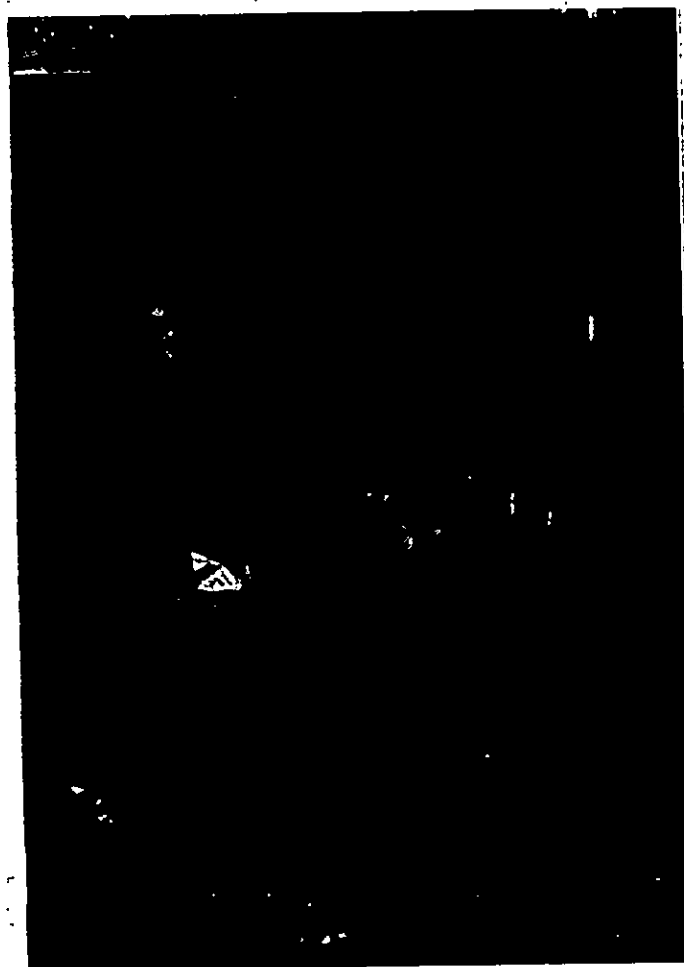
20.4.90



20.4.90 Two (2) months
after the flood - compare
with photo (1)

(8)

Our shed, nursery area and sites within the rainforest appeared to have experienced very mild conditions albeit the flood level was clearly marked as halfway up the shed wall. The wharf was moved (but not lost). It has now been re-established and secured in a safer location and will undoubtedly stay secure following the efforts of Senior Ranger, John Winter and Park Worker, Bill Boyd.



← flood level

(9)

20.4.90 Our shed survived the flood with no apparent damage.

Whilst contrasting results have now occurred on Coocumbac Island, it is clear that a prolonged flood condition similar to the 1978 situation would have had setbacks on the project. Hence it is now proposed to adopt an alternative strategy for primary cover establishment, this being specifically relevant to floodplain sites.

Several factors are obvious from this recent flood to assist the direction and ensure success of rainforest regeneration projects in floodplain sites:

- 1) flood energy needs to be dissipated and species capable of tolerance of this energy and inundation need to be planted in 'open' regeneration sites
- 2) species planted need to be ecologically and genetically suitable
- 3) primary cover needs to be established to provide the important shade conditions for secondary and tertiary rainforest species establishment over time. This primary cover needs also to satisfy points 1) and 2).



(10)

9.2.90 'Cap' regeneration sites within the rainforest proper handled the flood well with only minor impacts.

Our redirection is thus:

It is proposed that Flooded Gum (Eucalyptus grandis) be planted as a primary cover on the major disturbed areas of the island as a species:

- a) ecologically and genetically suitable to the site. Flooded gum is recorded on the island, on the adjacent mainland, at Wingham Brush (predating European occupation) and historical records confirm it as an emergent, scattered species on the Manning River floodplain within the rainforest community that existed at the time of European settlement.
- b) tolerant of both the energy and inundation of flood conditions.
- c) suitable for the development of rainforest in the understorey and therefore, an ideal primary species to establish the shaded conditions required for successful rainforest establishment.

To endorse this concept, Dr John Stockard, Project Manager of the Wingham Brush Regeneration Programme, has successfully undertaken a similar project on his own property at Wingham, within 1/2 km of the Wingham Brush. Initial planting of Flooded Gum followed by the introduction of rainforest species is well underway to the full establishment of a rainforest community. A 50% culling by ringbarking and poisoning (Roundup) has seen little damage by fallen limbs, rapid decomposition of culled trees and good recovery of any rainforest species affected by such culling. A similar regenerative capacity has been experienced following damage by Flying Foxes.

Experimentation therefore, at this level will hopefully set the pace for floodplain rainforest regeneration programmes, including that for Susan Island on the Clarence River at Grafton. The Wingham Brush Group have already indicated their interest in a supply of Flooded Gum for specific areas fringing the 'Brush' to dissipate flood energy impact. The Coocumbac team are currently researching access to local Flooded Gum genetic material via the Taree Forestry Office to propagate young trees for this programme. I strongly suggest this approach for Susan Island Nature Reserve.

Adding to the Coocumbac Island programme, the Greater Taree City Council has now approved the mainland based interpretative/picnic site on the river bank. Council will instal and maintain a litterbin - see copy of correspondence attached (Appendix I). It is therefore hoped that should funding be provided from NRCP 2, this basic development can proceed in the months between now and December 1989.

I have been particularly enthused by the successful Seasonal Ranger programme conducted at Susan Island over the January, 1990 period (Appendix II). Following discussion with the Superintendent, a similar programme utilising the Manning River Cruises, will be put to our District Staff Meeting to gauge support for such an activity with the following objectives in mind:

- 1) promotion of the Service's natural resource management capabilities
- 2) promotion to the local community the importance of rainforest conservation
- 3) potential access to volunteers to assist with the regeneration programme, as gained from the Susan Island experience

The Susan Island experience has to be one of the most successful Seasonal Ranger programmes undertaken for the Northern Region. This 2-day exposure will have inspired the local community and enthused the District to maintain the regeneration concept. I believe a similar response will potentially occur for Coocumbac island, which is critical to the ongoing commitment required to regeneration programmes. Wingham Brush has pushed a similar programme which has 'locked' their programme solidly to ensure their ongoing success to achieve the conservation and educational goals set by the National Trust in the conceptual days of their programme. This activity on Coocumbac island would best be undertaken by the work crew.

Hence, I am hoping for the necessary funding (\$20,000) to continue the programme over the next financial year to allow this work to go a further step in achieving the successful regeneration of the island.

Endorsement of the Seasonal Ranger programme and ongoing funding will assist the necessary management criteria and guidelines essential to other rainforest regeneration programmes yet to be undertaken by the Service.

The proposed programme for the next 6-12 months include the following:

- 1) relocate the jetty and sign (both done) to less prone flood sites
- 2) concentrate on flood affected areas for weed maintenance (see copy of work sheets attached)
- 3) re-establish marking stakes and walking-track system where affected by the flood (this is underway)
- 4) re-establish interpretative sign on island, including advertising NRCP funding. I favour a smaller photo-metal plate this time which is easily replaceable.
- 5) establish mainland based interpretative sign as agreed with the Greater Taree City Council (projected since 1978).

The above objectives should require minimal input at the District level as long as NRCP funding is forthcoming. Ranger Susan Luscombe has taken over the main administrative activities for the project, but given the Luscombe's District departure in the near future, I am confident that continuity of the programme, with the existing crew, will ensure its ongoing success.

However, I must be emphatic that the recent flood has necessitated a strong commitment from the crew to keep 'on top of things' and that continuity of the programme is critical.

Whilst morale is still high, doubt as to ongoing funding has curbed some vitality. Any lapse at this critical stage will potentially 'set back' the programme. The Service has only to equal the local Council's effort at Wingham Brush to retain its image in an area where rainforest regeneration has made its mark. I am confident that both the exposure and commitment to this programme, that has been supplemented by good documentation to date to the various levels of the Service, will ensure the Service's commitment and professionalism to continue to undertake such projects. Any deviation from this commitment will 'sow the seeds of doubt' as to our ability in this area of field management.

Hence, I strongly urge/recommend interim funding via District and/or Region Maintenance Funds to allow the continuity of the programme.

Reimbursement of maintenance funds can be undertaken with finalisation of NRCP. Achievement of the objectives outlined will improve the Service's image, staff morale and management expertise of natural resources.

Submitted for your urgent attention/endorsement.



Michael J Dodkin
Naturalist (Project Officer)
PORT MACQUARIE

29 June 1990

ATTENTION

1. Superintendent, PORT MACQUARIE

The regeneration proposals recommended are endorsed. The promotion of public visitation to Coocumbac Island for the foreseeable future is not endorsed. The extra workload that would be generated in maintenance, supervision and interpretation responsibilities is not seen as achievable or a morale builder, while the Works staff and Ranger staff are so over-committed now, and for some time into the future. When resources improve and work loads ease, this option can be further considered.

Newcastle 3/7/90.

2 Regional Manager, NORTHERN REGION

.....
Quote: National Parks & Wildlife Service
Field Officer's Branch
NEWSLETTER - JUNE 1990

(Page 2)

Staff Morale

Apart from reiterating his comments about improving our pay, the Director explained at some length his belief that the Service needs to raise its public profile and tell the world about all the good things we do ...

.....

Greater Taree City Council

ALL COMMUNICATIONS
TO BE ADDRESSED TO:

THE TOWN CLERK,
P.O. BOX 482, TAREE
N.S.W., 2430
DX7020 Taree

PHONE: (065) 52 2744



ADMINISTRATION: 2 PULTENEY STREET,
ENGINEERING, HEALTH AND BUILDING,
TOWN PLANNING: 146 VICTORIA STREET

IN REPLY,
PLEASE QUOTE: GPN:MH.P3-94-1

ENQUIRIES: Mr G Nix

FAX: (065) 51 0389

16 August 1989

The Director,
National Parks & Wildlife Service
P O Box 61
PORT MACQUARIE NSW 2444

Dear Sir

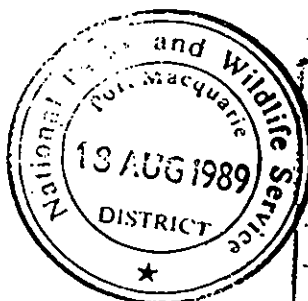
Coocumbac Island Nature Reserve

With reference to your letter dated 1 August, it is advised that Council approves of the table design submitted with your letter and it is suggested that you contact Council's Engineering Department to determine final location for the table and sign.

Council will make arrangements for the installation of a litter bin in proximity to the sign.

Yours faithfully

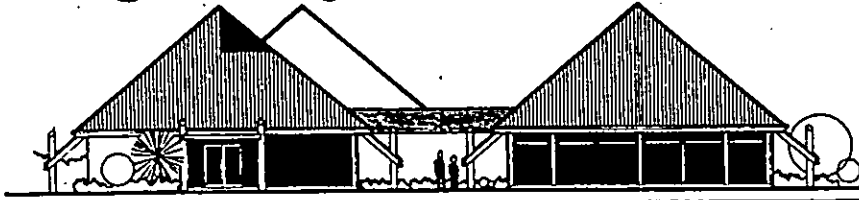

C E CHATWOOD
TOWN CLERK



NE	GC
JW	TW
CS	SD
GL	NL
SL	

Appendix I

Manning Valley Tourist Association



MANNING VALLEY TOURIST ASSOCIATION, INFORMATION CENTRE
PACIFIC HIGHWAY, TAREE NORTH. PHONE: (065) 52 1900

POSTAL ADDRESS

P.O. BOX 482
TAREE 2430

9th August 1989.

Mr M. Dodkin,
National Parks and Wildlife,
PO Box 61,
PORT MACQUARIE. NSW. 2444.



Dear Michael,

Further to your letter of 7th August 1989, unfortunately I will be unavailable on the 25th August, as I will be in Sydney. I have visited Coocumbac Island previously and was very impressed with the regeneration work.

With reference to the brochure, the Tourist Association were concerned at the \$700.00 cost for printing, having recently produced a similar (2) colour brochure for less than this amount. Therefore additional quotes may need to be sought. The Tourist Association will support this initial print run of 5,000 joint brochures. We would appreciate some recognition on the brochure advising of our financial support.

It would be appreciated if you could advise us of estimated production time. Obviously we would like to have them on display prior to the December School holidays. Also some indication as to the number of brochures we would have for distribution would be helpful.

Yours faithfully,

Lyn Hardes

Miss Lyn Hardes,
Tourism Promotions Officer.

LH.1p.

*Verbally cancelled
for the time being*

M.D.

Oct. 1989

SUSAN ISLAND GUIDED WALKAttendance

10am-4pm

11.1.90	230 persons
18.1.90	350 persons

The adventure began with a thrilling boat trip across the almighty Clarence River. Upon landing on the river bank the passengers took shelter under a huge red bean tree. Here the visitors were informed of the present and past history of Susan Island and informed of what was to come in the walk ahead.

Aims

*To introduce people to the Susan Island Nature Reserve.

*To show people the flying fox colony and explain the ecology of the bats in the rain forest.

*To introduce people to the problems facing remnant and bush regeneration techniques being used to combat some of these problems.

Evaluation

The aims were fulfilled in the guided walks throughout the reserve and more so people were leaving the Island with a deeper understanding and appreciation for the nature reserve and its inhabitants. We were pleased to find out the majority of visitors were Grafton residents and most of them had never visited the island before.

Recommendations

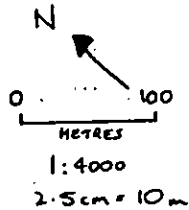
The keen response to this activity shows there should be a regular guided visit to the Island carried out incorporating the user-pays scheme.

Another alternative would be to tender for a tourist operator who could operate a steamer to the island and re-live history.

Appendix II

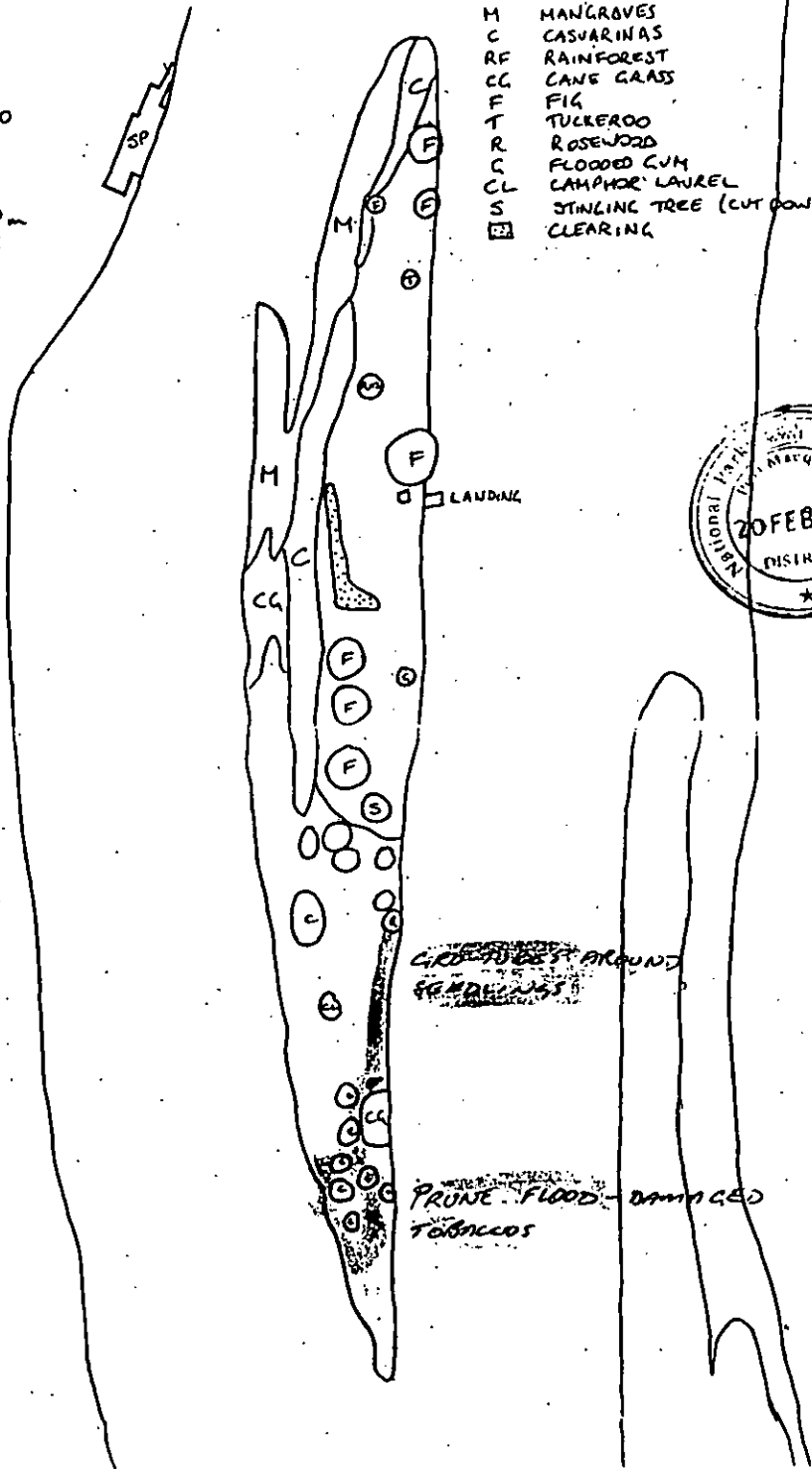
16.2.90

COOCUMBAC ISLAND



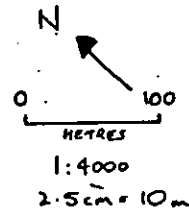
KEY

- M MANGROVES
- C CASUARINAS
- RF RAINFOREST
- CG CANE GRASS
- F FIG
- T TUCKEROO
- R ROSEWOOD
- C FLOODED CUM
- CL CAMPHOR LAUREL
- S STINGING TREE (CUT DOWN)
- CLEARING



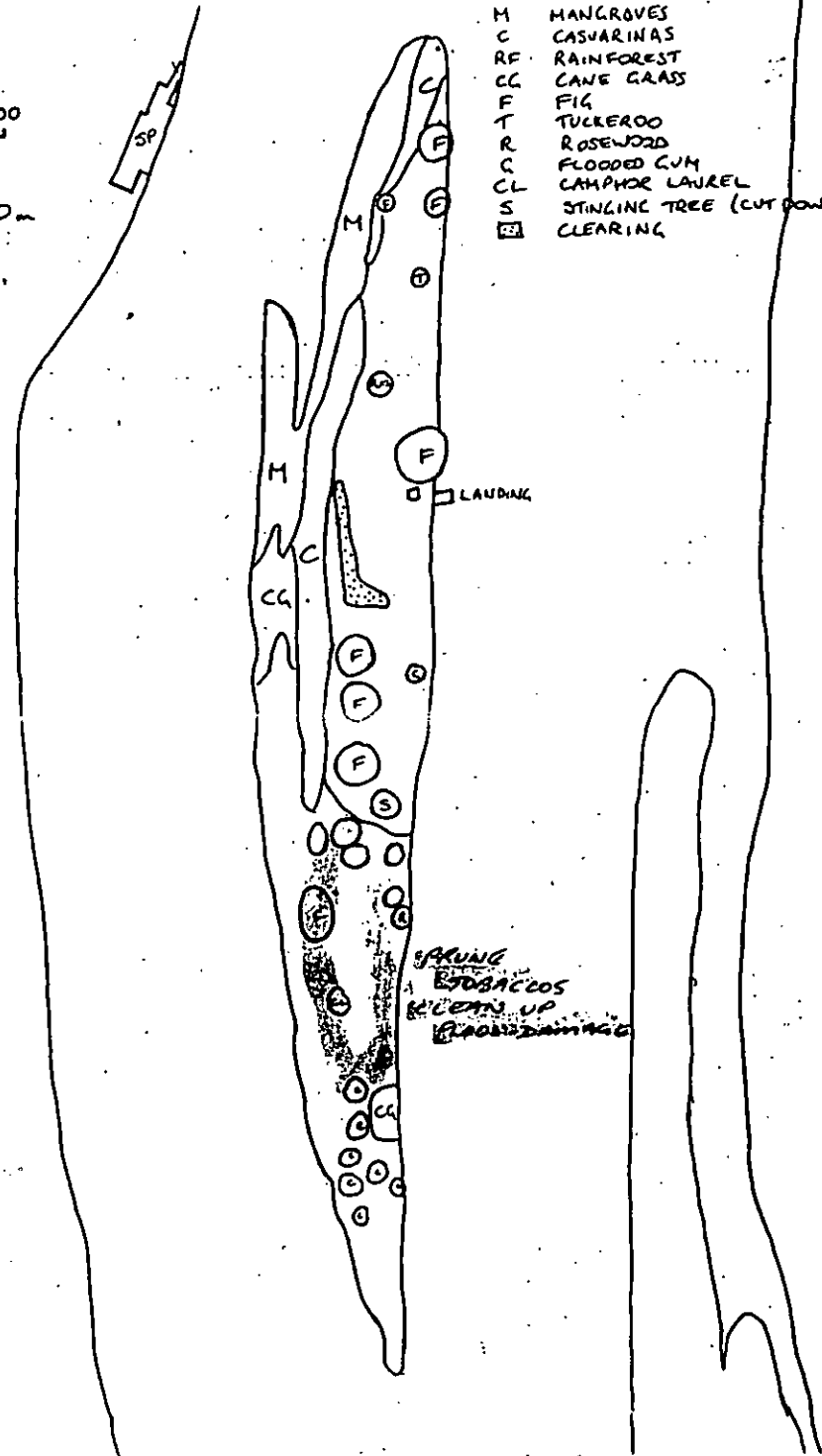
23.2.90

COOCUMBAC ISLAND

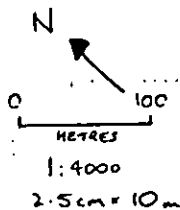


KEY

- M MANGROVES
- C CASUARINAS
- RF RAINFOREST
- CG CANE GRASS
- F FIG
- T TUCKEROO
- R ROSEWOOD
- C FLOODED CUM
- CL CAMPHOR LAUREL
- S STINGING TREE (CUT DOWN)
- CLEARING



1.6.90 COOCUMBAC ISLAND



KEY
 M MANGROVES
 C CASUARINAS
 RF RAINFOREST
 CC CANE GRASS
 F FIG
 T TUCKEROO
 R ROSEWOOD
 C FLOODED CUM
 CL CAMPHOR LAUREL
 S STINGING TREE (CUT DOWN)
 [] CLEARING

SPRAY

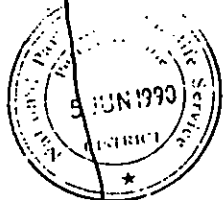
LANDING

HAND
 WEED
 EDGE

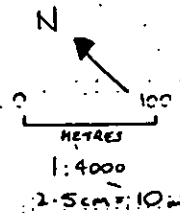
HAND
 WEED

PLANT TOLACOS

PATH
 MAINTENANCE



22.6.90 COOCUMBAC ISLAND



KEY
 M MANGROVES
 C CASUARINAS
 RF RAINFOREST
 CC CANE GRASS
 F FIG
 T TUCKEROO
 R ROSEWOOD
 C FLOODED CUM
 CL CAMPHOR LAUREL
 S STINGING TREE (CUT DOWN)
 [] CLEARING

LANDING
 PULL TRAP BACK FROM
 NATIVES - PREPARE
 FOR SPRAY

CUT VINES FROM TREES
 CUT/PAIN PRIVET
 (ROUND @ 100%)

PAINTING
 STAKES

TRAIL
 MAINTENANCE



NATIONAL PARKS AND WILDLIFE SERVICE

A/0256
JH/SP

RARE PLANT ARBORETUM MT. WARNING NATIONAL PARK

An arboretum housing specimens of rare or threatened rainforest plants of the Mt. Warning Shield was established as part of the National Rainforest Conservation program. This project involved the collection and propagation of plant material, clearing of the arboretum site, and planting of the rare or threatened species along with a protective cover crop. Details of works to-date are included in a separate report.

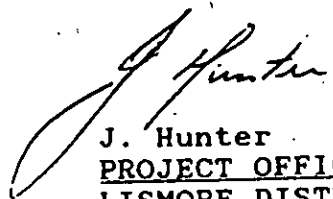
Future on-site needs for the arboretum include maintenance of juvenile plants, control of weeds and establishment of a walking track with interpretation. Further plantings of rare or threatened species propagated from material collected during the program are also planned.

To-date the project has permitted the collection of a wide range of the genetic diversity of a number of rare or threatened species in one locality, with the emphasis being placed on specimens of species most at risk from current land-use practices. Significant as these achievements have been, there are still many species and specimens at risk and it is desirable that the genetic variety of these also be sampled. Species and populations most in need of further work are outlined in the attached report.

The Mt. Warning arboretum has the potential to be expanded to more than twice its present size, allowing for a more complete conservation of rare or threatened species.

In summary, this project is in two parts:-

- a) maintenance of established areas and provision of educational facilities, and
- b) expansion of arboretum and establishment of plantings of more species.


J. Hunter
PROJECT OFFICER
LISMORE DISTRICT

NATIONAL RAINFOREST CONSERVATION PROGRAM

PROJECT CATEGORY: Public Information and Interpretation

PROJECT TITLE: New project. Educational Kit on NSW
rainforests

LOCATION: Schools and rainforest centre

PROJECT OBJECTIVES: To provide comprehensive information
on rainforests and rainforest
conservation in NSW for teachers and
students.

COMMUNITY BENEFIT: Up to date information on rainforests.

PROJECT DESCRIPTION: Compile and publish an educational kit
rainforest in NSW covering the following
major topics.
1. Gondwanaland derivations
2. Decline of rainforests in Australia
3. Current distribution of rainforest
4. N.S.W. rainforests and their world
heritage values
5. rainforest rehabilitation
6. supplement for each rainforest
centre

GROSS COST
ESTIMATES: 1990/91 - \$20,000

STATE CONTRIBUTION: \$10,000 which may reduce if permanent.
staff compile the kit.

COMMONWEALTH
CONTRIBUTION: \$10,000

N R C P

ADDITIONAL ACQUISITION FUND REQUESTS

1. SNOWS GULLY (MILLEDGE)
- PART LOTION 91 WHIAN WHIAN APT 18 Ha.
2. SNOWS GULLY (RUCKER)
- PART LOT 12 DP 622586 WHIAN WHIAN APT 12 Ha.
3. BORDER RANGES (MC QUEEN)
- LOT 79 TYAL GUM APT 76 Ha.
4. BRUNSWICK HEAD 5 (GALLAGHER)
- PART LOT 1043 DP 245503 OCEAN SHORES
APT 5.5 Ha.
5. LENNOX HEAD (JOHNSON)
6. NEW ENGLAND (MILLISAN)

NATIONAL RAINFOREST CONSERVATION PROGRAM

PROJECT CATEGORY: Publication/Education

PROJECT TITLE: N42 Information Panels - Major rainforest type

LOCATION: Mount Warning (subtropical rainforest)
Border Ranges (subtropical rainforest)
Nightcap (subtropical rainforest)

Washpool (warm temperate rainforest)

Susan Island (lowland subtropical rainforest)

New England (cool temperate rainforest)
Dorrigo (subtropical rainforest)

LAND TENURE: National Parks - Nature Reserves and World Heritage Areas

PROJECT OBJECTIVES: Provide environmental education facilities

COMMUNITY BENEFIT FROM PROJECT: Increased community understanding and awareness of rainforests types, their flora and fauna, and the recreational opportunities available, lookouts, walking tracks, picnic and camping areas.

PROJECT DESCRIPTION: Outdoor interpretive displays at:
1. Mount Warning Picnic Area
2. Border Ranges entrances
3. Coombadjha Creek, Washpool
4. Susan Island
5. Terania Creek
6. Point Lookout, New England

Mobile display on Dorrigo and New England World Heritage areas.

Self-guided walking track signs at:
1. Mount Warning summit track (10 signs)
2. New England lookouts and walking tracks (25 signs)
3. Dorrigo walking tracks (10 signs)
4. Terania Creek (8 signs)
5. Susan Island (3 signs)

GROSS COST ESTIMATES:

7 displays @ \$9,000	\$63,000
56 signs @ 300	<u>17,000</u>
	<u>\$80,000</u>

MATCHING CONTRIBUTION FROM STATE: \$40,000
COMMONWEALTH CONTRIBUTION: \$40,000



MEMO FROM REGIONAL MANAGER

TO ANDREW STEED Date 25/7/90

SUBJECT N.R.C.P.
ADDITIONAL FUNDING REQUESTS - 1990/91

PROJECT SUMMARIES & INFORMATION REPORTS
ON DORRIGO R/F CENTRE & COOCUMBAC ISLAND
REHABILITATION ATTACHED FOR INFORMATION &
REVIEW. PLEASE CIRCULATE TO OTHER COMMITTEE MEMBERS

I WOULD APPRECIATE IF THE REPORTS
COULD BE RETURNED AT NEXT
MEETING.

THANKS

NATIONAL RAINFOREST CONSERVATION PROGRAM

PROJECT CATEGORY: Interpretive and visitor facilities

PROJECT TITLE: N.41 Completion of Dorrigo Rainforest
Centre.

LAND TENURE: Dorrigo National Park

PROJECT OBJECTIVES: To increase public appreciation of
rainforest conservation by capitalising
on the high level of visitation to
Dorrigo National Park.

COMMUNITY BENEFIT: New educational and tourist facilities.

PROJECT DESCRIPTION: The rainforest centre building is
nearing completion, as is the rainforest
canopy viewing platform skywalk.

Additional funding is required to
complete the following:

- fitout and fixtures
 - access roads, parking and landscaping
 - interpretive display
 - fitout lecture room/theatre
 - link track to Glade.
-

GROSS COST Previous allocation \$450,000 1990/91
ESTIMATES: - \$160,000.

STATE \$80,000 plus supervision, permanent
CONTRIBUTION: staff on construction and display
production.

COMMONWEALTH
CONTRIBUTION: \$80,000

NATIONAL RAINFOREST CONSERVATION PROGRAM

PROJECT CATEGORY: Research

PROJECT TITLE: N76 Use of Remnant Rainforest Patches
by Flying Foxes.

LOCATION: Coastal N.S.W and S.E. Queensland.

LAND TENURE: All titles but particularly N.P.W.S.
area and State Forests.

PROJECT OBJECTIVES: Continue highly productive research into
flying fox migration, feeding cycles and
role in seed dispersal.

COMMUNITY BENEFIT: Understanding of important role of
flying foxes as pollinations and seed
dispersers in rainforest and sclerophyll
forests and their requirements for day
and maternity roosting sites in
rainforest remnants.

PROJECT
DESCRIPTION: Continue radio telemetry with solar
powered radio transmitters monitor
fruiting patterns of rainforest species.
Examine variation in annual diet. Study
role of flying foxes as pollinations.
Pteropus poliocephalus will be the main
species studied.

GROSS COST Previous funding \$140,000
ESTIMATES: 1990/91 \$40,000

COMMONWEALTH
CONTRIBUTION: 1990/91 - \$40,000

STATE \$60,050 in kind
CONTRIBUTION: wages - \$12,500
aircraft/vehicle \$48,000

Total cost of project has been reviewed due to costs associated with the project being undertaken on an island and the provision of basic facilities for works staff.

1990/91 Supplementation	\$20,000
State	10,000
Commonwealth	10,000

This is a most advanced rehabilitation program that needs continued effort for several more years. A flood in February 1990 has made additional funding in 1990/91 more imperative. An updated report 29/6/90 is available.

PROPOSAL FOR FURTHER FUNDING

Application for further funding concentrates on establishing long-term research and monitoring systems of both flying-fox movements and the rainforest fruit resource, and on initiating a study of the role of flying-foxes as pollinators. The proposed program consists of four sections:

1) Radio-telemetry -

In order to address in more detail the role of *Pteropus* in rainforest ecology, on-going information on both nightly foraging patterns and dispersal patterns of individual animals is required. The forest day-roosting habit of these animals make them ideally suited for solar powered radio-transmitter packages. As flying-foxes are long-lived animals, the use of devices which are constantly recharged through solar panels would potentially allow an individual to be monitored over many years. Long-term movement data for individuals would allow more detailed analyses of responses to changing patterns of food availability. These data have implications both for rainforest ecology and for management responses to commercial crop damage.

2) Rainforest phenology -

Monitoring of fruiting patterns of rainforest species in Northern N.S.W. through time is an essential part of ecological work in this complex system. Permanently marked individual trees of species important to flying-foxes would be monitored monthly, anticipated deviations in fruiting patterns due to topography and soil structure being incorporated into the design. This information would assist in interpretation of movement results and in evaluating the efficiency of *P. poliocephalus* as seed vectors.

3) Dietary analysis -

Examination of variation in annual diets of *P. poliocephalus* through analysis of faecal material from roost sites would assist in defining the relative importance of individual rainforest species as well as commercial fruit crops. The relationship among these data, that collected in 2. and information on available commercial fruit crops will aid in defining food preferences.

4) Flying-foxes as pollinators

Pteropus species are nectarivores as well as frugivores, feeding on blossoms of both rainforest and sclerophyll forest species. Their potential as pollinators of native species must be examined to further understand their ecological role in forest systems. Proposed work includes 1) detailed movement patterns of *P. poliocephalus* feeding on blossom, 2) lists of blossom species consumed 3) examination of the mechanics of pollination i.e. are *P. poliocephalus* successful in transporting viable pollen to mature stigma? (Initial data on 1 and 2 have been collected

5
during previous years.) As with seed dispersers, *Pteropus* are potentially exceptional amongst native pollinators in the distances they move viable pollen, therefore enhancing gene flow in rainforests and sclerophyl forests.

BUDGET - 1990-91

I. FUNDS FROM NRCP

Wages	
Research Officer - 7 months	\$18,000
Technical Officer - 4 months	9,000
Stores	
including radio-collars x 20	10,000
Travel	8,000
TOTAL	\$45,000

II. IN KIND CONTRIBUTION FROM N.S.W. NPWS

Wages	
Research Officer - 5 months	\$12,500
Aircraft (N.S.W. NPWS Cessna)	
300 hrs @ \$140/hr	42,000
Vehicle (4-wheel drive)	
20,000 km @ \$0.30/km	6,000
TOTAL	\$60,500

A/0256

NATIONAL RAINFOREST CONSERVATION PROGRAM

PROJECT CATEGORY: RESEARCH

PROJECT TITLE: RARE PLANT ARBORETUM

LOCATION: MT. WARNING NATIONAL PARK

LAND TENURE: NATIONAL PARK

PROJECT OBJECTIVES: CONSERVATION OF THE GENETIC DIVERSITY
OF RARE OR THREATENED RAINFOREST SPECIES OF THE MT. WARNING
SHIELD.

COMMUNITY BENEFIT FROM PROJECT: CONSERVATION OF GENETIC RESOURCES WITH
SCIENTIFIC AND POSSIBLE UTILITARIAN VALUE:
EDUCATION

PROJECT DESCRIPTION:

1. TO MAINTAIN ESTABLISHED AREA AND PLANTING
 2. PROVISION OF EDUCATIONAL FACILITIES
 3. EXPANSION OF ARBORETUM AREA
 4. PLANTING OF FURTHER SPECIES AND PROVENCES
-

GROSS COST ESTIMATES:

MATCHING CONTRIBUTION FROM STATE: \$20,000

COMMONWEALTH CONTRIBUTION: \$20,000

C/- NSW Environment Centre,
39 George Street, The Rocks. 2000
Ph 02 247 4206 Fx 02 247 5945

<< CONFIDENTIAL >>

URGENT - FOR THE DIRECTOR'S IMMEDIATE ATTENTION

Mr Bill Gillooly,
Director,
National Parks and Wildlife Service,
Bridge Street, Hurstville. 2220.

15.2.1991

Per fax: 02 585 6455

Dear Mr Gillooly,

Re: National Rainforest Conservation Program operation

You will be aware of the longstanding dissatisfaction of the North Coast Environment Council Inc. about the priorities, project selection, funding methods and community consultation of the Program. These matters have been raised with your office, DASETT, the offices of the NSW and Federal Ministers.

Our Secretary, Mr Jim Tedder, advises me that these matters are to be discussed at a meeting between yourself and the North Coast Environment Council Inc. in the near future.

I write urgently to further alert you to an matter which Mr Tedder and I agree cannot wait for that meeting.

Recently I was advised confidentially that the Service has decided to act to address a number of these concerns by requiring an independent audit of the program's operation. This is welcomed by the Council, but may come too late.

Our urgent concern, following that recent advice, is that the program appears to be continuing to be operated most unsatisfactorily. Decisions are being taken now, which will entrench the unacceptable standards of management and accountability which are now to be independently reviewed.

If this situation is allowed to continue for another day the Council is concerned that the balance of funds available for the Program will have been inappropriately committed and the Service's ability to redeem the Program effectively stymied.

Please act urgently to prevent the continuation of this alarming situation.

Yours sincerely,
For the Land...

John R. Corkill
Vice-President.

NRCP.

Bill Gillyoly. →

independent external
audit → internal audit
bureau State Treasury.

Supplementary note:

91/92 → text end:

desirous for better

Carben CANCOM.

Branwyn Hicks 27/2/57

11am Wed. / Not Monday

Westpac Chambers.

53 Blackall St Barton

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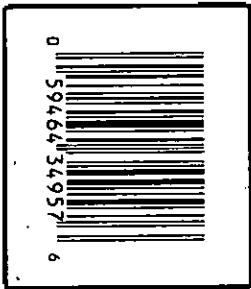
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des surfaces

MF2DD

Double face
Capacité
de 1 MB

KAO®

DRAFT OF LETTER TO BE SENT FROM N.E.F.A, N.E.C, N.P.A., B.S.E.C.
etc.

National Rainforest Conservation Program.

~~NRE.P. funds have been primarily used to construct visitor facilities (walking tracks, roads, picnic areas, interpretative displays and 'rainforest centres') and to a lesser extent undertake rainforest rehabilitation, prepare publications, research flying-foxes and ^{a very minor extent the} undertake of rare flora and fauna surveys.~~

Regrettably only a very small percentage of the over 7 million dollars already spent has gone into ^{compiling} ~~undertaking~~ an inventory of N.S.W.'s rainforests and ^{establishing} ~~establishing~~ an adequate data base upon which to determine ~~management~~ ^{conservation} and management requirements. - ^{Ne} ^{believe} [^] ^{data base} This [^] should have been the first ^{year} ^{program} of a rainforest conservation program, so to enable the determination of priorities from the base information obtained, including urgent areas for acquisition. ~~Program Manager~~ ^{side on decision}

~~As this wasn't done and because of the N.P.U.'s obsessive~~
~~desire~~ to channel the majority of funds into visitor facilities there have
been numerous shortcomings in the N.R.C.P.;

- visitor facilities have been established in environmentally sensitive areas where they have caused unacceptable degradation of natural values. eg. walking trees Bar Mountain Antelope Beebe Border Ranges Clematis sp. Sea Acres
- inappropriate developments both within and adjacent to World Heritage Areas have, and are continuing to be, allowed to degrade the values for which these areas were nominated. Porriño Rd. Cent. office Bar 14th
- the proliferation of visitor facilities have, and will continue to, be a sink which will consume an ever increasing proportion of the Service's scarce funds. Warrickmbe, ongoing maintenance Sea Acres
- many World Heritage Areas, National Parks and Nature Reserves have been allowed to be developed without Plans of Management or adequate environmental assessment. Totally inadequate Plans of Management have been prepared for some areas without an adequate data base eg. Warrickmbe, Washington NPS, Bar 14th
- rainforest rehabilitation has encouraged the use of herbicides eg. Brunswick Mts. NR, Big Scrub Remnants, Susan Island, Mone Pt without any proper evaluation of their effectiveness or consequences
- most rainforest rehabilitation operations are not part of ongoing programs encouraging participation from the public or organizations to ensure their continuation after N.R.C.P.
- grossly inadequate priority and funding has been provided for determining priority acquisitions/protection for rainforest conservation, undertaking flora and fauna surveys, rainforest rehabilitation methodology, rare species management, or visitor requirements and controls.
- NRCP funds have been mis-spent and mis-directed and no proper accountability of their use has been required by either State or Federal Governments. by environmental groups

either State or Federal Governments. A more detailed critique of projects is now being finalised for submission to NSW Treasury as part of an independent audit of 10800. At this late stage it is essential to direct remaining funds into generating data on flora + fauna distribution. This data base that can be used for making informed management decisions and establishing future priorities. The allocation of funding into the program herein outlined will enable the establishment of a rainforest Geographic Information System compatible with preparing decision conservation priorities and determining management guidelines. A broader forest GIS currently being developed by Natural Forest Inventory.

This ^{to} go on separate sheet with heading.
(Criticisms of NRCP To date)

(after 1890) would almost certainly have resulted in selective collection of artefacts.

Despite these impacts, the preservation of the resource generally is high, and individual sites are little disturbed. The absence of vehicular traffic on the terraces, and of soil tillage, is the basis of this assessment. Furthermore, the absence of artefact collection has meant that a large number of "classic" stone tool types, such as axes, survive on the sites located in the area surveyed, which is unusual in northern New South Wales.

~~EVALUATION OF SIGNIFICANCE~~

Evaluation

BF → The subject area, along with other Clarence River tributaries, provides important evidence for the testing of a range of economic and cultural models associated with mid-to-late Holocene Aboriginal life in eastern Australia. The area has general systematic value, as well as regional significance owing to the potential to integrate archaeological evidence from the ~~Manildra~~ ^{Manildra} Wilderness area with that from other north-eastern river catchments (eg. Guy Fawkes and Timbarra Rivers). The significance of the area (Appendix 3) to the Aboriginal community is outlined in a separate report ~~on this nomination.~~

The archaeological sites along the river terraces are relatively well preserved, and are likely to contain intact deposits. This site integrity can be expected to survive, provided that highly invasive activities such as logging, mining, and roadmaking are ~~kept out of~~ ^{excluded from} these areas.

The resource located in the upper forests is ephemeral and although currently relatively well preserved, is already somewhat affected by forestry use impact. Its survival is less well-assured.

Therefore, the major constraint of management of the area as a whole, with respect to Aboriginal site conservation, is to ensure the preservation of the most susceptible component of the resource - the upper forest sites. Forestry operations require infrastructural developments including roadmaking, which are detrimental to the preservation of these cultural resources. Therefore, proposed or continuing forestry operations should first include a study of sites likely to be impacted. Such a study may need to include salvage excavation.

Management of the area as ² National ^P Park should include specific commitment to continued identification of site locations, study of the preservational status of the resource, and research into the prehistory of the area in a regional context.