

19/10/93.

Dear John,

I thought you might be interested to  
glance at this stuff re outcome of  
blockade, + compromise on 357 in Mistake  
put it in NEFA file for others.

Also I've found out some info re changes CALM are  
working on for the SEMGIS I thought you might like  
to know about, so ring me sometime if you can. - See you  
one + 1/2 hr

Just speak to  
you! xx  
Syn.

0 + 1000

WAIT FOR IT . . . NAMBUCCA VALLEY CONSERVATION ASSOCIATION . . .  
 . . . SOUTH ARM CATCHMENT PROTECTION GROUP . . .  
 . . . BELLINGEN ENVIRONMENT CENTRE . . .  
 . . . BOWRA ACTION TRIBE . . .  
 . . . THE WILDERNESS SOCIETY, ARMIDALE . . .

# MEDIA RELEASE

12TH SEPTEMBER 1993

Five local environment groups are calling on the Forestry Commission (now called State Forests) to defer logging in a new compartment in Mistake State Forest until National Parks and Wildlife Service officers can inspect koala sites found by group members, scheduled for one week's time.

The groups: Nambucca Valley Conservation Association, Bellingen Environment Centre, South Arm Catchment Protection Group, the Bowra Action Tribe and the Armidale Wilderness Society have all endorsed an ammended harvesting plan they put to State Forests last week which seeks to balance timber interests with conservation of koalas and other identified endangered species.

"We want the wildlife experts to inspect the 5 koala sites that have been found to see if the area is signifigant for koalas. There are a lot mature Tallowoods and Grey Gums in compartnnet 357 which are koala food trees," said NVCA spokesperson, Lyn Orrego.

"However, State Forests say they cannot delay logging for even 24 hours. It is unacceptable to us that logging should begin before the inspection by NPWS, due on the 20th September," she said.

"The implementation of adequate koala reserves is vital for the survival of local populations of this vulnerable species. Our ammendments do not halt all logging," said Ms Georgia Beyer of BAT.

Concerned citizens and some members of the groups are camped in the forest and said to be considering a response to the refusal by State Forests to delay logging.

The four groups have also stated that NPWS have been irresponsible in allowing the Fauna Impact Statement (FIS) for Mistake State Forest to sit, unapproved, on their desks for 12 months.

"This has allowed logging to continue, under a temporary license to take and kill endangered species, in other compartments when the FIS is clearly inadequate and does not comply with the 22 requirements of the Director of NPWS," said Trevor Bailey of SACPG.

"The FIS involved only three days in the field and relied on opportunistic sightings only. A Freedom of Information request for more details of the survey revealed no records of site specific work or methodology," he said.

"It is therefore essential that NPWS inspect this compartment and apply mitigation prescriptions to protect the other 21 endangered species likely to be present as well, and that logging not begin before this," said Rob Mylan of BEC.

"Concerned citizens, qualified wildlife experts and some members of the environment groups have been camped in the forest for 2 months documenting the high conservation values of the Mistake State Forest. With 2100 hectares of old growth plus a significant spread of individual old growth trees, numbers of sacred and signifigant sites to the aboriginal people and the large number of endangered species we believe our requests are extremely reasonable," said Mr Marty Branagan of TWS Armidale.

We are also still concerned about erosion and siltation of streams from logging on steep slopes. Despite sending our scientists reports warning of environmental damage, State Forests continue to allow logging up to 35 degree slopes. It's crazy that Landcare groups with government funding are working on riverbank restoration projects downstream at Taylor's Arm while a government department, State Forests, continue creating the problems by their upstream activities, said Mr Trevor Bailey of SACPG.

"If the State Forests were genuine about ensuring sustained yield and biodiversity they would not find our requests unreasonable, but rather, good management practice," said wildlife ecologist Christina Potts.

"The job of ensuring this good management for all forest values should not be left in the hands of a few concerned citizens," she said.

For further information contact;

Lyn Orrego (NVCA)	(065) 647478 or (065) 647808
Trevor Bailey (SACPG)	(066) 551973 or (065) 647633
Rob Mylan (BEC)	(066) 551128 or (066) 552599
Marty Branagan (TWS)	

Approved documents

NEPA  
copy

# Urunga District Harvesting Plan

MAP A  
copy  
AP-2

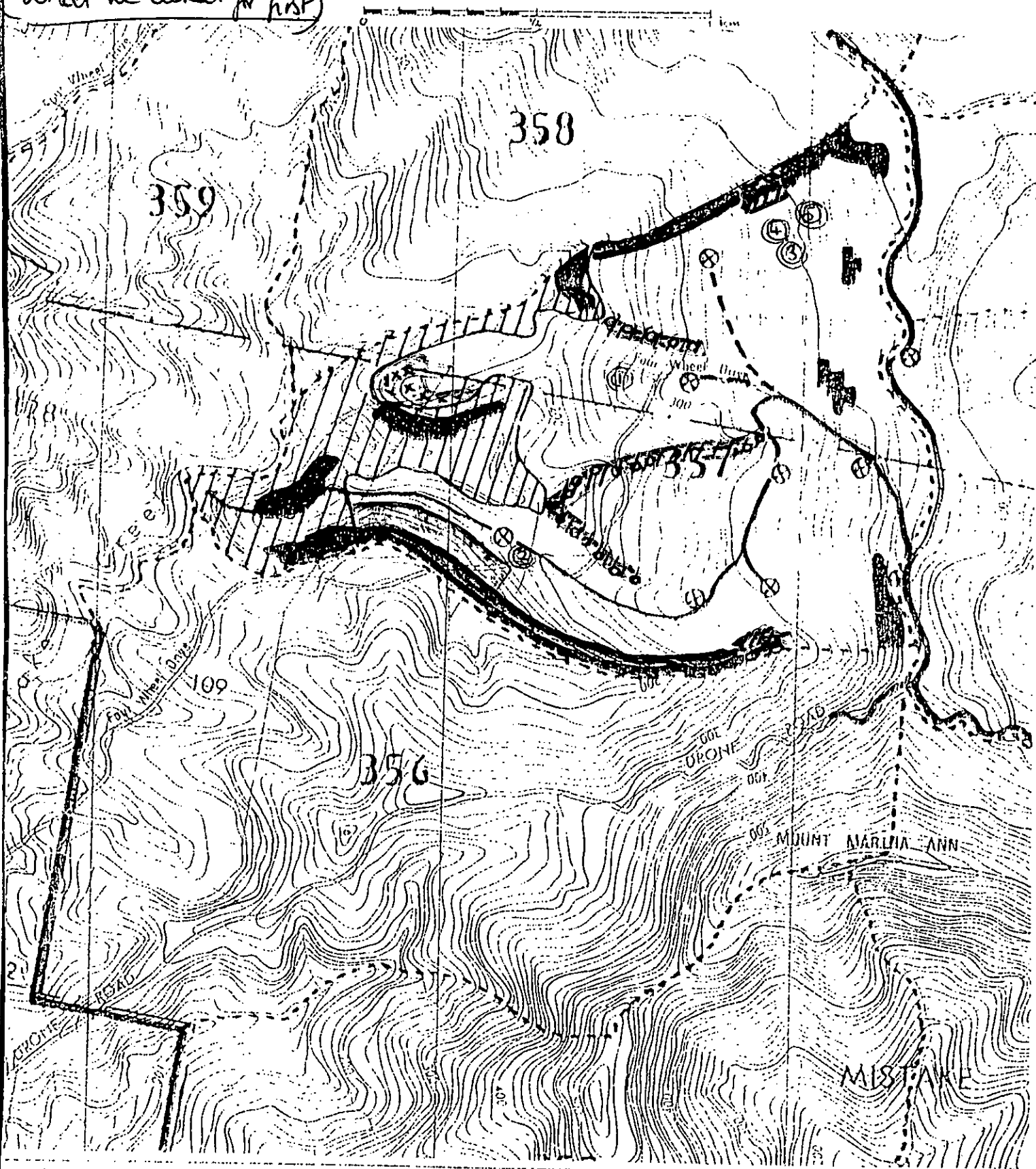
**MISTAKE** State Forest Compartment 357

What we asked for first

Scale 1 / 15000

Contour Interval 10 metres

1  
GN



- Compartment boundary .....
- Filter strips (4m wide) .....
- Protection strips 20m wide each .....
- Road, sided no logging .....
- Dump site, Wet weather dump .....
- Fence .....
- 6.2m forest type (Reserved) .....

- State Forest boundary .....
- Reserved from logging (Reserved) .....
- Special emphasis area (hard test) .....
- Slopes > 30° (approximate) .....
- + Extra protection strips  
10m each side of drainage lines
- Kaula evidence sites: ①, ②, ③ etc.

MISTAKE STATE FOREST

The following ammendments are required: The reasons for these are outlined in the attached Discussion Paper.

3.7.2 Habitat Retention

A habitat tree is alive and contains hollows in the trunk or crown which are available for use by aboreal fauna. Four habitat trees per hectare shall be retained. Recruitment habitat trees shall be retained at the same density or more if needed to maintain such numbers in perpetuity.

In addition four koala food trees per hectare shall be retained. The koala food trees shall be mature or over-mature Tallowood or Grey Gum.

Where four habitat trees are not present the most suitable trees shall be retained to achieve the required number.

Koalas add

The indicated koala evidence sites on map 'A' shall be inspected by NPWS before logging commences within 100m of the sites.

3.7.4 Aboriginal Sites add

Surveys for sacred and significant sites to the satisfaction of the traditional custodians and NPWS.

3.8.3 Drainage Lines

The indicated filter strips on the north and south compartment boundaries shall be 40m wide.

The indicated protection strips shall be 20m wide. No trees are to be felled within protection strips.

Unmarked drainage lines shall have 10m protection strips. No trees are to be felled within protection strips.

3.8.7

Construction of snig tracks on side slopes above 25 degrees shall not be allowed. No trees shall be felled on slopes above 25 degrees.

3.8.8 Delete

3.9 add to (i)

Koala food trees to be retained shall be marked with a yellow 'F'.

add (iii)

Location and species of habitat and koala food trees to be

marked on a map overlaid with a one hectare grid.

Other additions:

Fire

Post logging and hazard reduction burning is to be excluded from the whole compartment.

NPWS

NPWS will be invited to comment on the proposed flora reserve in the period of the koala inspections and survey before logging commences.

NPWS will inspect the koala evidence sites and conduct further surveys if they deem them necessary before logging commences.

NPWS will be invited to conduct surveys on the endangered species listed in the attached discussion paper and provide additional mitigation prescriptions.

Please note also that as further information comes to our attention we will be passing it on the State Forests Inc with our recommendations.

*Lyn Omega*

NUCA

9/9/93

Not included:  
Discussion paper re this by  
Earthspan

Site 1:

## HAIR ANALYSIS

## Mistake State Forest

No.	Date Found	Locality	Scat	Comments	Comments
* 1	Aug 93	Comp. 357 "Koala?"	Koala	Grooming hairs of koala, <i>P. CINEREUS</i> , plus plant material.	
2	"	Comp. 363 South ridge	Bandicoot	Grooming hairs of bandicoot - probably <i>L. INNECOURUS</i> - Northern Brown Bandicoot. Also soil + insect fragment.	
3	"	Comp 356 GR 651081?	Fox	Hair + bones + claws of brushtail possum - probably <i>TRICHOSUPTUS CANINUS</i> . (Mountain Brush-tail)	
4	"	Boundary 356/7. Kunzea gully 6803	Dog	Hair + bone fragments of Swamp Wallaby - <i>W. BICOLOR</i> . + grooming hairs of dog - <i>C. FAMILIARIS</i> .	
5	"	MR 0803	? Fox	Hair + bone fragments of brushtail possum - <i>T. CANINUS</i> .	

Site 2: Scats have been sent to Barbara Triggs.  
Results not yet received (as at 16/9/93.)

Sites 3, 4 + 5: The actual scats are in the possession of NEFA and are available for checking. We are confident they are Koala scats because of the previous confirmations and trained people in the field.

NEFA

NAMBUCCA

VALLEY CONSERVATION

ASSOCIATION Inc.

P.O. Box 123  
Bowraville 2449

(065) 647 808

PRESS RELEASE

UPDATE

14 September 1993

Rain has given a temporary reprieve to the Koalas of Mistake State Forest.

Conservationists camped in Compartment 357 of the forest are happy to be wet and miserable according to spokesperson Lyn Orrego, as it means logging might be delayed the crucial week until NPWS officers can arrive to inspect the area. The NPWS inspection is set down for next Monday.

State Forests today confirmed their rejection of the plea of the five local environment groups to delay the logging for a week until the significance of the area for Koalas can be assessed by NPWS and appropriate conditions can be applied to protect the koalas. It is envisaged most logging could then proceed.

The groups have also written to NPWS criticising them for their lack of action on the Fauna Impact Statement (FIS) for Mistake State Forest. NPWS has had it for 12 months without either approving or rejecting it.

"The FIS process has got bogged down in bureaucracy. It is supposed to be a process for generating strong, science based conditions on logging and creation of wildlife corridors and reserves," she said.

"This has left the 22 endangered species found and likely to be found in Mistake State Forest largely unprotected. The blanket temporary licenses to take and kill endangered species issued across most of the state as well as in Mistake are not based on science or special surveys. They were never intended to go on for so long - nearly two years now. They can hardly be said to be temporary," she said.

"We want best practice and due process applied to Mistake State Forest and it is the Director of NPWS's responsibility to ensure this happens," she said.

For further info contact : NVCA Lyn Orrego (065) 647478  
or (065) 647808

Let's care for the environment... life depends on it.

## MEDIA RELEASE

September 15, 1993

Local Gumbangir member, Trevor Jarrett, who has been living in a "Koori Embassy" for six months in Mistake State Forest, inviting and teaching others Koori culture, has fully endorsed the conservationists call not to log cpt 357 in Mistake State Forest until National Parks and Wildlife Service officers have inspected for koalas and other endangered species.

Several local environment groups last week presented emergency ammendments to the harvest plan for cpt 357 to State Forests demanding adequate fauna surveys before logging commences. These, however, were rejected by State Forests.

The conservatinists have also called for sacred and signifigant sites in Mistake State Forest to be identified by a comprehensive study and protected.

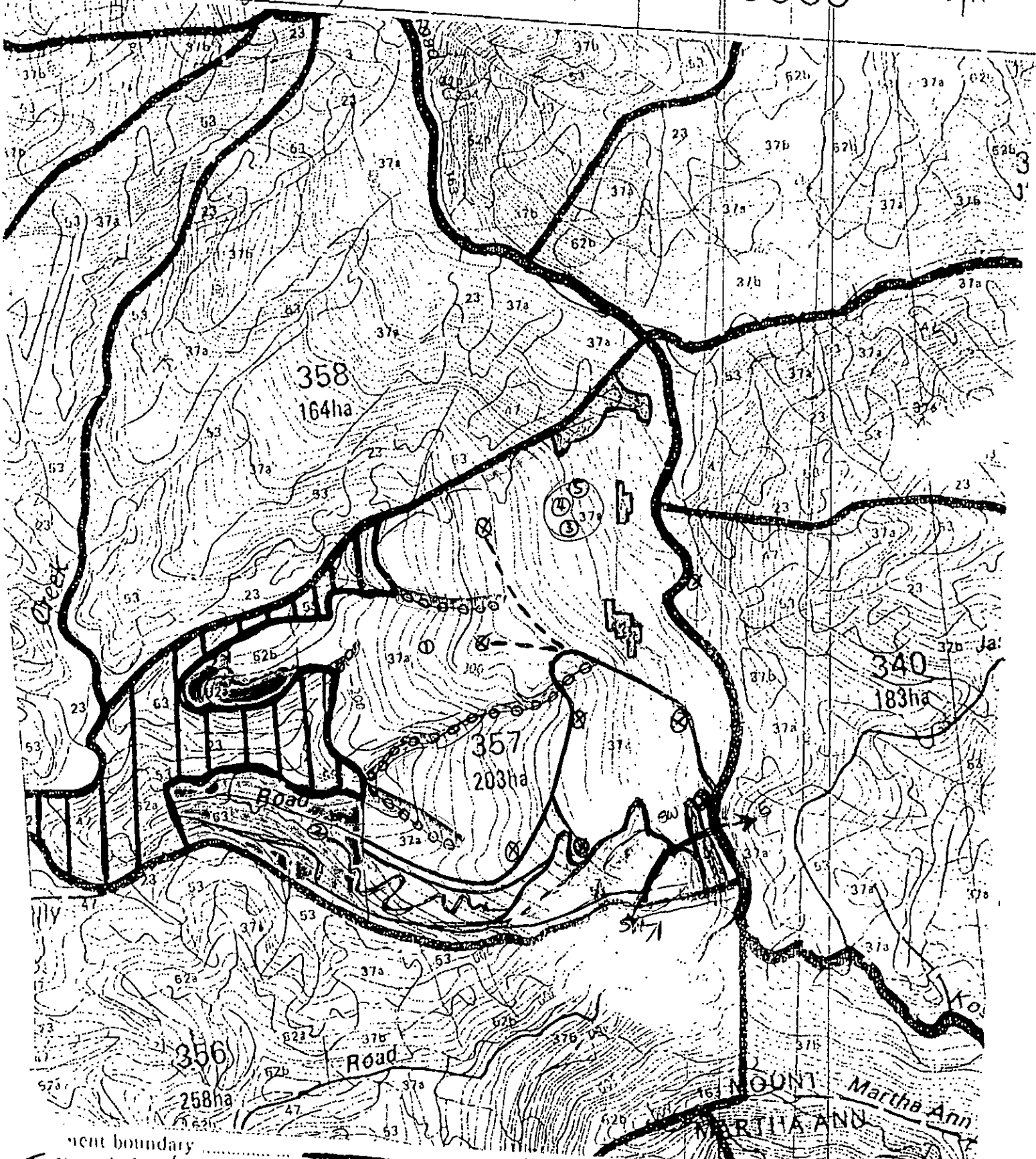
"Mount Martha Anne and Bowra Sugarloaf are very important places to the local koori people spiritually, mentally and physically. They are signifigant in the Dreamtime to me and my people," said Trevor Jarrett.

"We the local custodians want more consultation and a methodology applied which will identify and preserve our signifigant sites," he said.

For further info: (065) 647831 Bowraville Aboriginal Lands Council



Detailed Amendment 19/9/93  
 Compartment 357  
 Forest Type Map 1:15000  
 (what we asked for 2nd)  
 NEPA  
 AVCA copy  
 G/N



vent boundary  
 Filter strips (extra)  
 (Protection 20m wide  
 no disturbance)  
 weather dump  
 26) Porcine

State Forest boundary  
 Reserved from logging  
 Special emphasis area  
 slopes > 30° (approximate)  
 Southern Limer Reserve Extension  
 ① ② ③ etc = Krala Sites



DETAILED AMMENDMENTS TO HARVEST PLAN: COMPARTMENT 357  
(as at 19/9/93)

MISTAKE STATE FOREST

The following ammendments to the original harvest plan are required for reasons listed in the attached discussion paper.

3.7.2 HABITAT RETENTION

(change first paragragh to:)

A habitat tree is alive and contains hollows in the trunk or crown which are available for use by aboreal fauna. Four habitat trees per hectare will be retained. Recruitment habitat trees will be retained at the same density or more in order to maintain such numbers in perpetuity.

(add)

Where four habitat trees are not present the most suitable trees will be retained to achieve the required number.

(add)

In addition four koala food trees per hectare will be retained. The koala food trees will be mature or over-mature Tallowwood or Grey gum.

KOALAS

Koala sites marked on the ammended harvest plan map will be surveyed by NPWS before any logging or roading begins. Any further sites will be protected with a 100m radius excluding logging operations until these sites are inspected by NPWS.

3.8.3 DRAINAGE LINES

The indicated filter strip on the northern compartment boundary will be 40m wide and will extend to the steep area marked on the map.

The southern boundary filter strip will be widened to approximately 50m below the road. The upper boundary of the filter strip will roughly follow the boundary of the forest type marked as 53 (Brush box). See purple area on map.

The indicated protection strips will be 20m wide.

Unmarked drainage lines will have 10m wide protection strips.

No trees will be felled in protection strips or filter strips. No machinery will be taken into protection strips or filter strips.

### 3.8.7 SNIG TRACKS

Construction of snig tracks on side slopes above 25 degrees will not be allowed. No trees will be felled on slopes above 25 degrees.

### 3.8.8

(delete)

### 3.9 (i) TREE MARKING CODE

(add)

Koala food trees to be retained will be marked with a yellow 'F'.

(add)

(iii) Location and species of habitat, and koala food trees should be marked on a map overlaid with a one hectare grid.

### FIRE

Post logging and hazard reduction burning will be excluded from the whole compartment.

### ABORIGINAL SITES

Sacred and significant sites should be surveyed, to the satisfaction of the traditional custodians and NPWS.

### SOUTHERN CORNER RESERVE EXTENTION

See attached map.

### NPWS

NPWS will be invited to comment on the proposed reserves during the koala inspection. They may deem it nessesary to do further surveys, if so, logging should not be resumed until these are done.

NPWS will be invited to suvey other endangered species and provide additional mitigation prescriptions.

## DISCUSSION PAPER

This is a brief paper outlining the reasons for the proposed amendments.

### 3.7.2 HABITAT RETENTION

The retention of koala food trees is essential as Grey gums and Tallowwoods which are the primary food source for koalas do not typically form hollows and therefore will not be retained as habitat trees.

#### KOALAS

Significant koala habitat areas have been found in the north-eastern segment of the compartment. A number of trees in the area contain recent scratchings and high scat counts. As at 19/9/93 17 koala sites have been found as detailed on attached map.

This area would not appear to be favourable koala habitat simply from map inspection as forest typing for this area is inaccurate. The forest type is marked as 37a (dry Blackbutt), however, the area contains a significant stand of Grey gums and Tallowwoods which are currently supporting koalas.

### 3.8.3 DRAINAGE LINES

The widening of the filter strips on the compartment boundaries, in particular the southern boundary, is important for several reasons:

- Firstly, the areas within the filter strips are of forest type 53 (Brushbox) with dense rainforest understorey. State Forests Inc. are legally bound to protect rainforest but fail to protect the rainforest understorey in this forest type.
- Secondly, this area is part of Mistake Creek catchment and hence should be adequately reserved to maintain water quality for Mistake Creek and associated water ways.
- Thirdly, the area appears significant as habitat for koala and other species. A number of large scratched Grey gums and Tallowwoods have been found. Results from hair tube analysis are currently being obtained.
- Finally, the area has significant old-growth values. As the only logging evident in the area appears to be quite dated and selective it's impact was minimal. This forest has retained it's original structure and contains mature Brushbox, Eucalypt and rainforest canopy species.

Discrepancies exist between the number and location of drainage lines marked on the harvest plan map and those that exist on the ground. These unrecognised drainage lines must be protected.

### 3.9 (iii)

The recording of location and species of habitat and koala food trees is nessessary to ensure sufficient numbers of these trees are retained.

### SOUTHERN CORNER RESERVATION EXTENTION

The reserve extention is required for the following reasons;

- Firstly the area shows significant evidence of being a koala habitat area (scats and scratchings).
- Secondly, the forest type in this area, 62 Grey Gum, Grey Ironbark and White Mahogany, is at present unrepresented in reserves and NPWS have shown concern for it's preservation in the EIS determination (attachment 1 part 13).

Cpt 357 Mistake State Forest  
extra prescriptions from NPWS 21/9/93  
what NPWS gave

NEFA

#### Compartment 357 Mistake State Forest

Following the site inspection on 21/9/93 of Compartment 357 Mistake State Forest by NPWS and State Forests staff agreement was reached regarding the implementation of the following prescriptions for this compartment.

##### 1. Habitat Tree Retention will be as follows.

In Dry Hardwood and Moist Hardwood forests with a xeromorphic understorey habitat tree retention shall be four trees per hectare (where present). For the purposes of this prescription a xeromorphic understorey is considered to be one composed predominantly of grasses, heath, and/or shrubs with sclerophyllous leaves.

Habitat tree retention in Dry Hardwood and Moist Hardwood forests with a mesic understorey shall be six trees per hectare (where present). For the purposes of this prescription a mesic understorey is considered to be one composed predominantly of moist elements such as vines, shrubs with mesophyllous leaves and/or rainforest ferns.

Habitat trees will be live hollow bearing trees. They are to be well spaced throughout the compartment being harvested consistent with the size of canopy gaps required for adequate regeneration and growth for the species of these forest types. Where the specified density of habitat trees is not present the existing density is to be retained. Sufficient recruitment habitat trees to sustain the retained density of habitat trees into perpetuity are also to be retained. Stags shall not be counted as habitat trees.

In addition, all practical precautions shall be taken to protect identified habitat trees during logging operations. The following shall be adhered to:

1. All practical precautions shall be taken to avoid tree heads landing adjacent to identified habitat trees. In gapping operations tree heads shall be moved to the centre of gaps prior to burning.

2. In forests with a xeromorphic understorey tree heads will be removed from within approximately a 5 metre radius of identified habitat trees. Tree heads shall be removed with minimum disturbance to understorey vegetation and ground logs.

3. In forests with a mesic understorey heads of trees within a radius of 10 metres of identified habitat trees are not to be burnt.

##### 2. Koala Habitat Retention

a) Around Koala sites 3, 4 & 5 there will be further dung searches (for a minimum of 3 minutes for each tree) around all Tallowwoods, Blue Gums and Grey Gums with scratches. The following will apply:

i) If dung is found but there are less than 12 pellets per tree then that tree plus 3 others > 25cm dbh of the same species will be retained per hectare (in the area indicated on the attached map) in addition to the habitat trees retained.

ii) If 12 or more dung pellets per tree are found all trees within 100 metres will be retained pending further survey by trained forestry staff.

##### b) Further Surveys.

In the area around Site 1 and the last area searched for Koala Dung on 20 / 9 / 93 (see attached map) Chris Moon will conduct a Training course for State Forests staff in systematic surveys (i.e. transect and/or asterisk technique).

No further work will be undertaken within 100 metres of those sites until a survey determines the extent of and the habitat components being used by Koalas at these sites. The training survey will occur within 3 weeks from 20 / 9 / 93 and State Forests will bear the salary and travel costs of Chris Moon.

c) For other areas within the compartment the marketing foreman will routinely look for signs of Koala activity and report any findings to the Urunga District Forestry Office and subsequently the NPWS per the interim Koala prescription for the north - east forests contained in the Harvesting Plan.

3. Pending the review of wildlife corridors within Urunga District by State Forests staff no logging will occur within 40 metres of the gullies forming the northern and southern boundaries of Compartment 357 within the areas mapped as Type 53.

## Urunga District Harvesting Plan

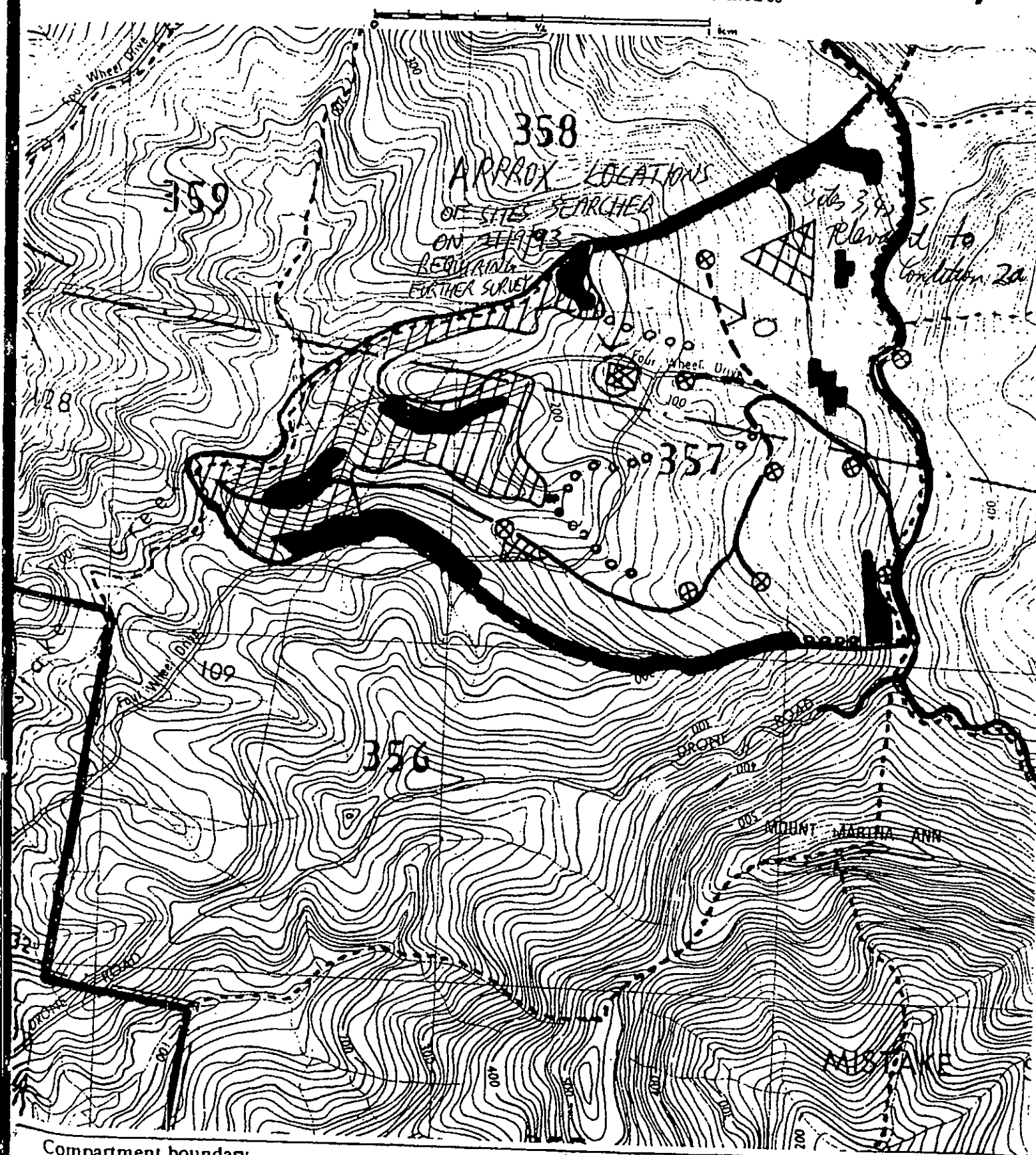
**MISTAKE**

State Forest

Compartment 357

Scale 1 / 15000

Contour Interval 10 metres



- Compartment boundary .....  
 Filter strips .....  
 Protection strips .....  
 Road, .....  
 Dump site, Wet weather dump .....  
 Fence .....

- State Forest boundary .....  
 Reserved from logging Proposed Reserve .....  
 Special emphasis area (Habitat logging) .....  
 Slopes  $> 30^\circ$  (approximate) .....

Koala investigation area

1. Thankyou for inspecting cpt 357 and considering our requests.
2. We (NVCA & BAT) are happy with the koala prescriptions. Thankyou

However we would like clarification on four points:

- a.) What is the Forestry Commission's understanding and definition of searching "routinely" for dung and scratches?
- b.) Our understanding of the koala prescription in the harvest plan is as follows. Could you confirm this is correct?

Following the routine search, if dung or scratches are found, a 100m radius remains undisturbed until a State Forests officer trained in koala searching inspects within that circle, decides on what trees are to be retained and sends this information to NPWS for their concurrence (or modification) which is agreed by NPWS to be given to State Forests within 24 hours.

- c.) Will State Forests please confirm that they will activate the koala prescription (as described above at b.) if and when conservationists inform State Forests of sites where they have found recent evidence of koalas?
- d.) We request that 6 conservationists be permitted to attend the Training Course for systematic surveys.
3. NVCA and BAT are happy that the filter strips on the northern and southern boundary of the compartment have been extended and widened to 40m. Thankyou.
4. We are appreciative of the extra area (marked in dark green) reserved on the southern boundary. We note it is half the width requested but accept your determination.
5. We ask now for your consideration of two small but high priority areas which we feel are essential to be added to the southern boundary reserved area. We have reduced this request to the bare minimum:

- A.) The basin shaped area marked on the attached map in pink. We consider this to be rainforest with mixed rainforest and eucalypt (mainly brushbox) emergents. We estimate the area to be only \_\_\_\_\_ hectares.
- B.) Widening of the 40m filter strip to 75m along the southern boundary so that it may better act as a wildlife corridor. See attached map (green coloured area). We estimate the area to be \_\_\_\_\_ hectares.

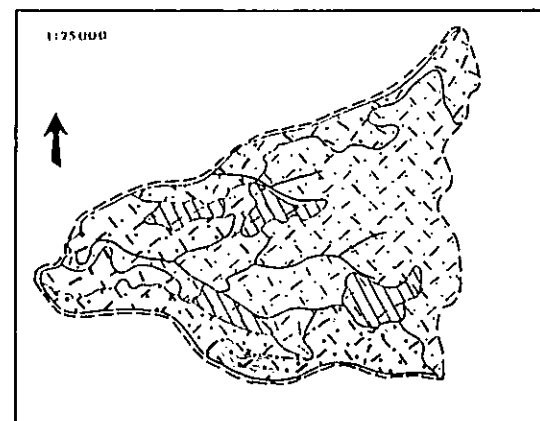
Please note: At the time of writing agreement to the position outlined above has been received from the following groups:

Nambucca Valley Conservation Association







The agreement of the remaining groups will be sought progressively and as speedily as possible. 22/9/93

## Vegetation Patterns of Compartment 357 - Mistake State Forest

The majority of this compartment has been typed by the Forestry Commission as Dry Blackbutt (37a), with small areas of Grey Gum - Grey Ironbark, White Mahogany (62), Brush Box (53), Rainforest (23), and Tallowwood (47). Whilst a reserve system (proposed flora reserve and drainage line buffers) incorporates forest types 53, 47, 23 and a small area of type 62, there remain significant areas of Type 53 not included in the reserve system. This area is primarily located along the southern compartment boundary and comprises old growth forest with emergent pyrophytic and rainforest trees and most probably a rainforest understorey. Other areas comprising emergent (old growth) trees are scattered throughout the remainder of this compartment and along the northern compartment boundary, although emergent trees are less frequent than along the southern boundary.



### Key

-  Compartment Boundary
-  Drainage
-  Pyrophytic Vegetation
-  Rainforest Vegetation
-  Emergent Pyrophytic Trees
-  Emergent Rainforest Trees



NEPA

BAT response to what was given

BOWRA ACTION TRIBE

RESPONSE TO STATE FOREST'S PRESCRIPTIONS for 357,  
(22/9/93)

This is a brief outline of the groups decisions and certainly requires further discussion with State Forests. Time limits placed on us as well as unfortunate circumstances are the reasons for the brevity of this initial response. A more detailed response and discussion will be forwarded to State Forests as soon as possible.

#### FIRE

The group is not happy with the prescribed burning regime and demands that no top disposal burning takes place where a mesic understorey exists.

#### ABORIGINAL SITES

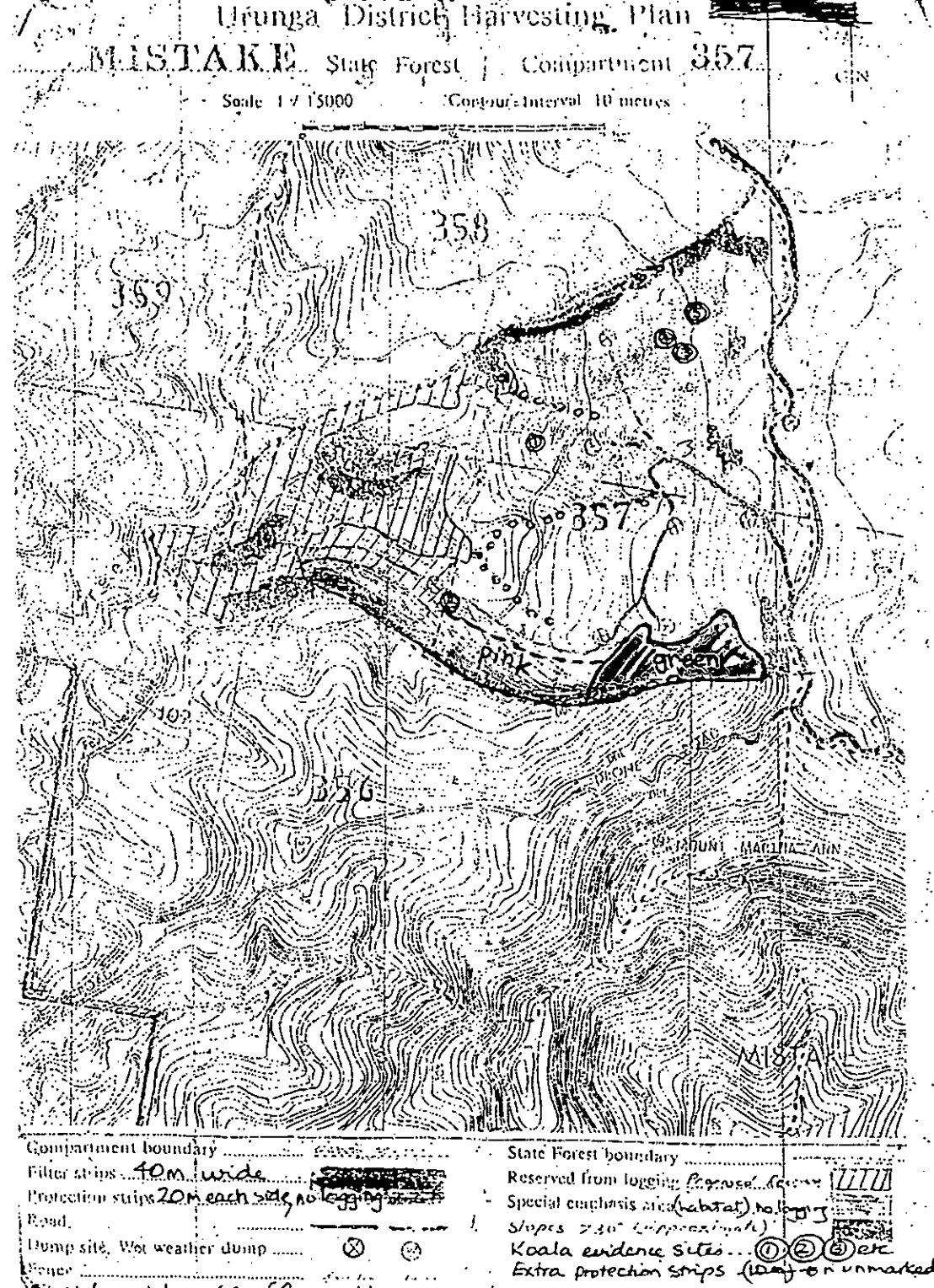
The group believes that the necessary surveys for site identification have not been undertaken to the satisfaction of Traditional Custodians, the Aboriginal Community and the Lands Council.

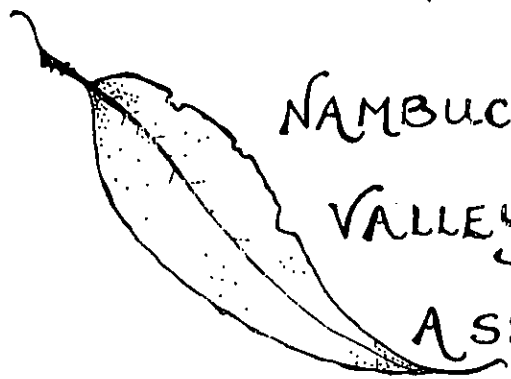
#### SOUTHERN BOUNDARY FILTER STRIP

The group has decided that the western section of this filter strip requires more than a 40m protection zone and wishes to further negotiate with State Forests concerning this. See pink section on map.

The group sees the eastern section of this filter strip, as determined by the boundary of forest type 53, as being of the utmost importance. This area is marked on the attached map in colour green and requires full protection.

These are the major concerns of the group and they warrant further discussion between the groups involved and State Forests. This is imperative to ensure a satisfactory outcome and appease all parties involved.





NAMBUCCA

VALLEY CONSERVATION

ASSOCIATION Inc.

~~NVCA~~ Copy

NETA

P.O. Box 123  
Bowraville 2449  
(065) 647 808

PRESS STATEMENT ----- UPDATE ON MISTAKE STATE FOREST

September 22, 1993 10 am

State Forests and National Parks and Wildlife Service have added prescriptions to the Harvest Plan for compartment 357 in Mistake State Forest to allow logging to continue while further koala surveys are undertaken in the vicinity of koala sites found by conservationists.

The conservation groups are believed to be happy with the decision on further koala surveys, according to spokesperson, Lyn Orrego.

"However, conservationists have also requested a wildlife corridor along a rainforest gully where old growth brushbox and rainforest trees are emergents. This now seems to be the only outstanding area of disagreement," she said.

"State Forests have agreed to a partial widening of the strip to 40m, but conservationists are presently trying to negotiate for this to be widened. We believe agreement could be very close and we're hoping the negotiations will bring a successful outcome for all parties which would see logging continue as well as wildlife values protected.

"The results of the negotiations should be known later today or tomorrow," she said.

For further info: Lyn Orrego 065) 647808 or 647478

Let's care for the environment... life depends on it.

Final agreement

NAMBUCCA

VALLEY CONSERVATION

ASSOCIATION Inc.

P.O. Box 23  
Bowraville 2449  
(065) 647 808

Attention: District Forester, Mr Steve Rayson:

We the undersigned groups accept the following as the final harvest plan prescriptions for compartment 357 Mistake State Forest:

1. Prescriptions contained in the harvest plan of 13/9/93.
2. The additional prescriptions agreed to by State Forests and NPWS and faxed to NVCA on 21/9/93.
3. The additional undertakings given to Lyn Orrego at a meeting on 23/9/93 and set out below:

a.) "routinely" as it applies to the foreman looking for signs of koala activity is to mean the foreman will look under grey gums and blue gums with recent scratches and under tallwoods in drier hardwood sites and search for koala dung.

b.) That the following is the agreed understanding of the general koala prescription contained in the harvest plan of 13/9/93:

Following the routine search, if dung or scratches are found, a 100m radius remains undisturbed until a State Forests officer trained in koala searching inspects within that circle, sends the information to NPWS for them to decide what trees are to be retained and gives their concurrence which is agreed by NPWS to be given to State Forests within 24 hours.

c.) Where conservationists inform State Forests that they have found 12 or more pellets under a tree the above general koala prescription will be implemented. Conservationists will mark the tree, note the location on a map, leave most of the pellets in place and inform State Forests.

d.) State Forests have no objection to conservationists approaching Mr Chris Moon to hold a Training course for them in Mistake State Forest at some time in the future.

-2-

NEFA

e.) The following area as described below is to be reserved from logging:

From the point where the inspection party stood at their last inspection point on 20/9/93, before returning uphill to Dead Man's Gully Road, a line will be drawn eastwards to the compartment boundary on Kosekai Road and a line will be drawn in a southwesterly direction until intercepting the southern compartment boundary. The area within the thus described lines and the compartment boundaries mentioned is the area to be reserved.

On the basis that the above prescriptions are implemented we undertake to do the following: (as requested)

- Ensure that Kosekai and Dead Mans Gully roads are unobstructed by 1pm, 24/9/93.
- Ensure that banners are removed from compartment 357 and the immediate vicinity.
- Accept this as the final decision allowing logging, in line with these prescriptions, to continue unfettered.

All the above is agreed to by:

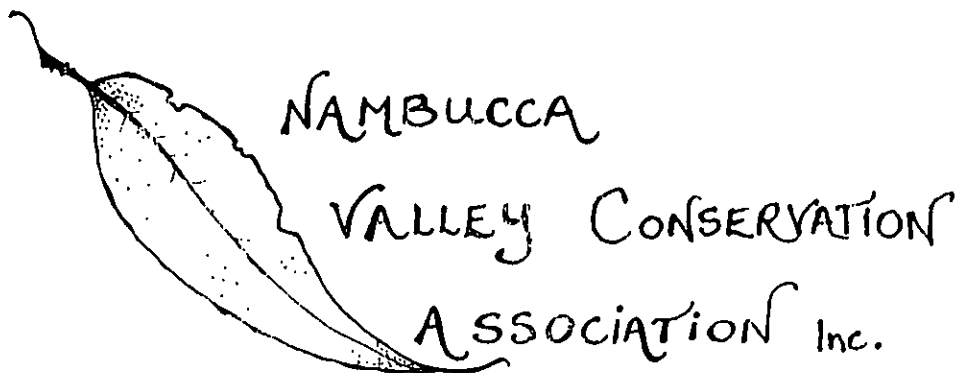
Nambucca Valley Conservation Association (NVCA)  
Bowra Action Tribe (BAT)  
Bellingen Environment Centre (BEC)  
South Arm Catchment Protection Group (SACPG)  
The Wilderness Society, Armidale (TWS)  
Scientific Surveyor (Christine Potts)

Lyn Orrego  
(Vice-President)  
NVCA

23/9/93

Let's care for the environment... life depends on it.

NEFA



P.O. Box 123,  
Bowraville 2449  
(065) 647 808

MEDIA RELEASE

SEPTEMBER 24, 1993

Five local environment groups yesterday accepted a compromise harvesting plan for compartment 357 in Mistake State Forest west of Bowraville, following negotiations with State Forests the day before.

"The move means confrontation in the forest is no longer a danger and will see logging proceed as well as wildlife protection increased," said spokesperson Lyn Orrego.

"Not all our requests were met, however, a small area of old growth brushbox was added to the wildlife corridor. We and many scientists consider brushbox to be rainforest," she said.

"It will be hard for us to see some areas of this compartment go, however, all the groups decided to accept the compromise in this case as State Forests also moved our way by supporting further koala surveys to be done by experts, widening filter strips and adding two areas of brushbox to the wildlife corridor. They also treated our representations seriously and spent all day Monday inspecting the compartment with NPWS officers.

"It should be a signal to State Forests in other areas that negotiations with conservationists are worthwhile and that our claims should not be brushed aside or labelled "extremist".

"It should also inform the general public that the timber industry AND conservation of wildlife can both continue.

"We will still continue to pursue our objectives in the rest of Mistake State Forest hoping to gain public recognition and official acceptance that parts of this forest are worthy of being dedicated as a major reserve for our area. It is a treasure at our backdoor full of endangered species, 2100 hectares of intact old growth forest and has a high value for water catchment protection for the growing coastal population of our area."

For further info contact: Lyn Orrego (065) 647478

Let's care for the environment... life depends on it.

You're invited

to a one day course

for North Coast ( & other )

Environment Campers

# KOALA SURVEY

## METHODS

with Chris Moon

~~DATE~~ 2000

in Pine Creek State Forest near Bundagen

MEET @ Corner of Tuckers Rock Rd & Pacific Hwy  
(turn off to Repton)

Bring a lunch, notebook, no pets

Cost \$5 or donation

10 AM

Let us know if you're coming @ 1up 6410 11 (65)  
or 6410 11 065

This precedes the meeting of the  
North Coast Environment Council to be held on  
Saturday 30th October at Bundagen

You are welcome to camp Friday night at Bundagen

ENVIRONMENTAL IMPACT ASSESSMENT

TITLE OF ACTIVITY: INTEGRATED LOGGING AND ASSOCIATED ROADWORKS  
DISTRICT: URUNGA - NORTHERN REGION - STATE FORESTS OF N.S.W.  
STATE FORESTS: OAKES, BUCKABENDINNIE AND MISTAKE STATE FORESTS  
COMPARTMENTS: 372 to 376 INCLUSIVE

Part A: EPA Regulations - Clause 56:

Factors to be taken into account when considering the likely impact on the environment include whether the activity may cause:

- (a) any environmental or social effect on a community  
 (b) a transformation of the locality  
 (c) any environmental impact on the ecosystems of the locality  
 (d) diminution of  
     (1) aesthetic values  
     (2) recreational values  
     (3) scientific values  
     (4) other values  
 (e) any effect on structures or places having aesthetic, cultural, historical, scientific, archaeological or special values  
     (e1) any impact on the habitat of any protected fauna within the meaning of section 98 of the National Parks and Wildlife Act 1974 or endangered fauna within the meaning of the act;  
         Refer to Part B  
 (f) danger to any species of flora or fauna  
 (g) any long term effects on the environment  
 (h) any degradation of the quality of the environment  
 (i) any risk to the safety of the environment  
 (j) any curtailment of the range of beneficial uses of the environment  
 (k) pollution  
     (1) Air  
     (2) Water  
     (3) Noise  
 (l) any environmental problems from the disposal of waste  
 (m) any increased demand on scarce resources  
 (n) any cumulative environmental effect with other existing or likely future activities  
 (o) any department from established policy

departure

N	T	M	S	RN
	✓	✓		1
	✓	✓		2
	✓	✓		3
	✓	✓		4
	✓	✓		5
✓				5
	✓	✓		5
✓				
	✓	✓		3
✓				
✓				
	✓	✓		6
✓				6
	✓	✓		6
	✓	✓		7
	✓	✓		8
	✓	✓		7
✓				
✓				
✓				9
✓				

N = Nil/Not Applicable  
 T = Temporary  
 M = Minor  
 S = Substantial  
 RN = Refer to notes attached.

The only true statement here is (o)  
 - there is no department(?) from State Forests' established policy of covering up the rape of our native forests.

**Proceedings of**  
**GENETIC ENGINEERING FORUM**

**August 1st & 2nd, 1992**

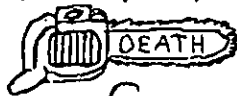
**SYDNEY**

**Nature Conservation Council of NSW**

The views expressed in this publication  
are not necessarily those of the  
Nature Conservation Council of NSW.

So, according to State Forests (Forestry Commission), logging has only minor effects on the forest!

In Mistake, Buccrabendinni and Oakes State Forests, several compartments are to be logged next year, starting in March.



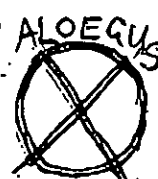
We have established a Summer Forest Camp and will be:

- surveying for flora and fauna
- locating and walking through Old Growth and Rainforest
- preparing for probable future blockades
- mellowing out in ancient forests, sitting in the shade, drinking and swimming in pure, clean water

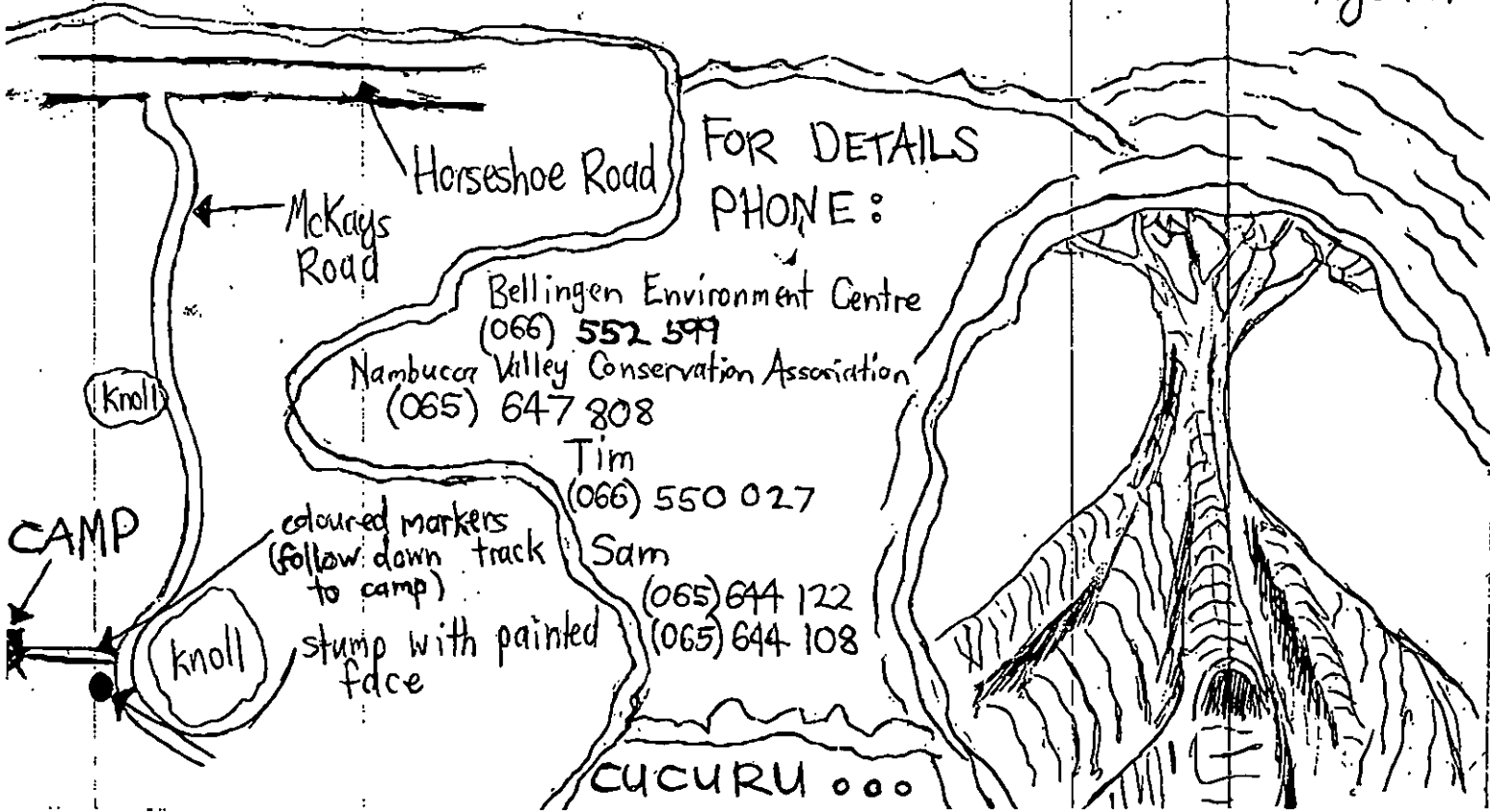


If all or any of the above interest you, come and visit us for an EARTH EXPERIENCE.

Bring food, camping gear, and musical instruments, but no dogs as they freak out the forest animals.



DIRECTIONS: From Bellinghen → towards Thora → Horseshoe Rd → McKays Rd  
From Bowraville → North Arm Rd → Horseshoe Rd → McKays Rd





management of bushland to be made. The survey work should include an accurate description of each land unit, the vegetation types in map form, the condition of the vegetation, native and weed species lists and recommendations for management.

## **2) Deciding what you want to achieve and why**

In Woollahra's case, it was found that there were 3 reserves that warranted bushland regeneration work. These were Gap Park, Parsley Bay Reserve and Cooper Park. Gap was the worst; remnant heathland and some fig trees existed in pockets, but the remainder of the land was grassed and open on an exposed coastal site. What did we want to achieve?

Basically, we wanted an asset instead of a liability in recreational terms. The park had little meaning or interest to the community. Dogs were the main users of the open flat areas, whilst hundreds of visitors used the clifftop footpath from the Gap to Old South Head Road, their interest outward looking not site orientated. After 10 years of managing and regenerating the park as bushland, we now have a park which is interesting, offers several recreational settings for users, has conservation value and is a major tourist destination in Sydney.

We could have left it as a grassed paddock with rock outcrops, interpreted the former tram track and the gun fortifications, but we would have fallen short of its recreational potential within a developed community.

A common feature to both the other parks was their landform-steepish sideslopes forming a gulley with creek, and adjacent flat land. The flat land had been developed as grassed play/picnic areas, but the bushland sideslopes were being invaded by exotic plant species, aided and abetted by nutrient flows, birds, wind dispersal of seed and upslope garden escapes. Though both parks were large in size (relative to Woollahra), it was felt that a long-term commitment to bush regeneration would provide the best results in terms of cost effective maintenance and recreational opportunities for the area and the users. You have to bear in mind that the area is highly developed residentially, with high real estate value and development potential as a top human priority. The aspect from some of these high priced lands is of course the very wooded and natural shores of Middle Head, Dobroyd Head and North Head. So what we wanted to achieve was that which we didn't have.

## **3) Finding the resources and money**

Back in 1982, it was costing the Council \$15,000 per year to contract the National Trust to work in the 3 parks on 1 day per week basis, in teams of 4 people. In 1992 it now costs us \$65,000 per year to continue the Trust contract, and this year we won a Metropolitan Greenspace grant towards the ongoing Trust work. The Council has consistently supported this expenditure for bushland management.

There was recognition that we couldn't just leave it to the Trust, other wise their 1 day per week efforts would not progress far. Just consider - we had 26 hectares of bush parks, with 4 Council gardeners to maintain them, so you can imagine how much detailed work got done on the other 4 days of the week, with 1 person per 6 hectares.

Prelim Draft

TIMBER RESOURCES OF THE MACKSVILLE MANAGEMENT AREA AND MISTAKE STATE FOREST. Prepared from State Forest records by Dailan Pugh.

Macksville Management Area is one of those claimed to be managed on a sustained yield basis, though in practice this is not the case. Like most other Management Areas claimed to be on sustained yield an investigation of the management plan, yield assessment and annual reports reveal inflated assessments, gross overcutting and contempt for the Management Plan that is meant to be abided by.

In summary mis-calculations and mis-management have led to:

- \* gross overcutting of quota sawlogs, in the five years from July 1987 to July 1992 the average annual quota removal was 9 870 cu. m. net., representing an average annual overcut of 27%, exceeding the annual limit by as much as 43% in 1987/88.
- \* actual yields being significantly below predicted yields by up to 50%.
- \* premature cutting of quota resources for the second cutting cycle (after 1995), which will lead to significant future shortfalls,
- \* failure to abide by the Macksville Management Plan's order of working and cutting limits, and
- \* failure to manage the area's forests on a sustainable basis.

Based on 'Hardwood Assessment - Macksville M.A. Coastal Working Circle' (Forestry Commission 1979) the Forestry Commission (1978, as ammended to 1987) estimated the yields available from the Macksville MA as from 1902, though noted that the "derived volumes have limited accuracy". It was estimated that there was a total of 171 780 cu. m. gross of sawlogs over 40 cm. diameter (dbhub) available after 1982 from the Coastal Working Circle for the first cutting cycle (giving a net annual yield of 7 730 cu. m.) and a total of 71 100 cu. m. gross (34 000 cu. m. net) of merchantable quota sawlogs in the 'Up River Forests', anticipated to be utilized by 1982.

Mistake State Forest was arbitrarily divided into the Up River and Coastal Working Circles. Mistake SF was estimated to contain 24 800 cu. m. gross (12 000 cu. m. net) of the sawlog volumes in the 'Up River Forests'. It was assessed as containing 51,943 cu. m. gross of the sawlogs available from the Coastal WC for the first cutting cycle (CC1) which was to last until 1995. Timber available from the Coastal WC for

9/11/93

Out

Dear John,

Dailan is working on  
this re overcutting  
in Macksville MA

Thought you'd be  
interested. For NEFA file  
& awareness.

I haven't forgotten I'm  
updating the cpts of concern  
re Mistake/Oakes etc. I'll send

it Soon - hopefully.

Take care.  
Also enclosed some order forms for

Thanks  
you put in Big Scrub  
- could you  
send me  
more  
propp.

the first cutting cycle was to come from 'Stand Condition Types' A and B, with type C reported as:

"Suitable for sawlog production but stands immature for quota sawlog harvesting - quota sawlogs not available for practice economic harvesting until second cutting cycle (beyond 1995)." (FC 1979)

The quotas for sawlogs in the Macksville MA were set as 1978/79-1979/80 26 880 m. cu. net, 1980/81-1981/82 8 000 cu. m. net (FC 1978 p2, p24) and as from 1982/83 "The annual yield shall not exceed the total of annual quota commitments" of 7 800 cu. m. net (FC 1978, as ammended 1982, p24).

The Forestry Commission (1978) note:

"The up river forests mainly consist of logged areas carrying 0-20 year old regeneration as a result of logging; with a few virgin stands. These forests are very deficient in intermediate size classes. It is estimated that available merchantable logs will be harvested by about 1986 some 40 years before any existing regeneration can produce sawlogs."  
(pp17,8)

"Timber production objectives shall be met by concentrating harvesting in the economically accessible hardwood resource of the virgin up river forests. On completion of harvesting of this resource, logging will be confined to the coastal forests." (p.22)

"The option of timber production from the up river forests after the current cutting cycle will not be actively pursued in the foreseeable future. Expenditure associated with road construction, maintenance, protection and silvicultural treatment will be kept to a minimum." (p23)

The combination of wet weather, Allen Taylors not being satisfied with the species available (eg. FC 1982/83) and the Forestry Commission's financial losses led to an abandonment of the Management Plan's intent to log out the Up River forests before concentrating on the Coastal Working Circle.

The Forestry Commission's intention not to manage the Up River forests on a sustained yield basis is still current, their only concern being to maximise what they can cut in order to "try and find sufficient quota to maintain the 7 800 m3 sustained yield cut longer than the end of CC1" (FC 1988/89)

The Forestry Commission's Annual Reports make a number of comments on the yield assessments: "It should be noted that segregation into the strata used in the assessment is virtually impossible to achieve" (FC 1981/82), "It would appear from data presented that there is a broadening gap between actual and predicted yields for the total coastal working circle. ... it would appear that for Mistake S.F. at least, the stand condition typing on which the assessment is based is proving unreliable." (FC 1985/86), "The major problem remains the gaps between actual and predicted yields on Ingalba and Mistake S.F.s. ... Assessment was done using random plots and it could be they did not sample enough of the poorer country. This coupled with the forest being cut over at so many different periods could produce the wrong information." (FC 1986/87), "... the whole question of sustained yield after [unlogged areas are] exhausted needs to be tackled as a separate issue, probably involving measurement of a better defined resource.", "The question of what actually should constitute the CC1, CC2 and CC3 sustainable area needs to be resolved, sooner rather than later due to the poor results being achieved compared to that assessed." (FC 1987/88)

As from 1988/89 the Macksville MA was subsumed by the Urunga MA for management purposes. The Urunga MA Annual Reports continued to emphasise the inadequacy of the resource assessments in the Macksville MA: "A proper assessment of all the resource is required", "... yields being obtained on Coastal areas are of great cause for concern." "... CC2 (27 years) cut needs to yield over twice the CC1 cut to achieve predicted yields. Whether this will occur is completely unknown as no follow up assessment of stand structure remaining, as required by CUTAN monitoring, has ever been done." (FC 1988/89), "... a complete assessment of the districts timber resources is urgently required and is a priority." (FC 1990/91).

Since 1982 the actual yields from the Coastal Working Circle have been slightly below the assessed yields (FC 1979) for Nambucca and Way Way State Forests, almost half the assessed yields for Ingalba State Forest and significantly higher for Mistake State Forest (FC 1989/90). While this would appear to give an overall favourable result this disguises the fact that it has involved the premature harvesting of trees meant to be retained for the second cutting cycle (CC2, after 1995). The Forestry Commission (1989/90) note that the 1979 Yield Assessment assumed that only Strata A and B would be cut in CC1, whereas Strata C has also been harvested (see above).

TABLE 1. HARDWOOD (NON-RAINFOREST) REMOVALS FROM MACKSVILLE MANAGEMENT AREA. Source: respective Forestry Commission Annual Reports.

YEAR	QUOTA CUT m3 net	QUOTA CUT m3 gross	NON-QUOTA SAWLOGS m3 gross	OTHER
1981/82	8 600	10 581	6 668	1 724
1982/83	7 606	10 650	450	5 474
1983/84	3 678	4 787+	9 190	3 457
1984/85	8 448	11 827+	19 825	4 749
1985/86	8 934	12 507+	23 084	7 905
1986/87	7 640	10 696+	24 573	5 250
1987/88	11 167	15 634+	15 518	7 072
1988/89	9 540	12 059	20 492	5 262
1989/90	9 433	12 914	24 977	5 590
1990/91	10 588	15 323	21 548	5 231
1991/92	8 624	12 615	15 560	5 103

+ These volumes estimated by applying a multiplier of net to gross of 1.4

The practice has been to log the most productive stands first (FC 1988/89, p11) indicating that the deficiency in actual yields will worsen into the future.

It is evident from Table 1 that the State Forests have been grossly overcutting in the Macksville Management Area in breach of the cutting limits specified in the Management Plan. In the 5 years to July 1987, since the quota was set as 7 800 cu. m. net from July 1982, there was an annual average removal of 7 261 cu. m. net and in the five years from July 1987 to July 1992 the average annual quota removal was 9 870 cu. m. net., giving an average over the ten years of 8 566 cu. m. net. per annum. The gross overcutting in the last five years should be of considerable concern as it represents an average annual overcut of 27%, exceeding the annual limit by as much as 43% in 1987/88.

In total the actual yield of quota sawlogs taken over the ten years exceeds that estimated as being available by 7 658 cu. m. net, or almost one years supply. When this overcut is considered in conjunction with the fact that anticipated yields per hectare have only been maintained by taking timber meant to be retained for the next cutting cycle and logging the most productive stands first it indicates significant yield problems for the Macksville MA in the near future.

While no assessment of the future availability of non-quota sawlogs and durable poles is available it is apparent that these resources too are not being managed on a sustainable basis and their availability is expected to rapidly decline in the near future.

When Trevor Bailly obtained an injunction in 1987 to stop logging in some Up River compartments in Mistake State

Forest the Forestry Commission "maximised" their cutting rate in the Coastal WC part of Mistake SF (FC 1988/89), until the court judgement on March 31st 1989 caused them to suspend logging operations in Mistake State Forest until an EIS was prepared.

TABLE 1.2. The Forestry Commission's (1988/89) "best current estimate of remaining identified resource" in Mistake State Forest was given as:

	GROSS AREA	NET Quota/Ha.	TOTAL
Mistake (southern)	340	14.3	4850
Mistake (northern)	916	4.4	4050
TOTALS	1256	7.1	8900

Despite all the identified failings of the resource assessments in the Urunga Management Area (including the Macksville MA) the State Forests commission is pressing ahead with its revised (long overdue) Management Plan and the Urunga-Coffs Harbour Environmental Impact Statement without undertaking a reliable yield assessment. The undated document prepared by State Forests for the EIS consultants states:

"Only the coastal forests have been assessed for quota sawlog yield. The plantation resource has been the subject of a yield scheduling exercise using data collected from previous growth and inventory work and past yields. All other areas have had estimates of various products availability made where sufficient information from past yields allows such estimation to be reasonably accurate."

The State Forests seem intent to cover up their gross overcutting and the identified resource shortfalls in the coastal forests, and ignore the premature cutting of resources identified for the next cutting cycle and that their yield assessments for the Up River forests are unreliable. Their intention is not to undertake a valid yield assessment until some time in the future, in the mean time they intend to continue unsustainable logging of quota sawlogs from the Urunga MA at the prescribed rate of 25,520 cu. m. per annum.



EarthSpan

CONSULTANCY & PRESENTATION SERVICES

## The Dungir Conservation Proposal

---

LIMITED FIRST EDITION COPIES AVAILABLE NOVEMBER 1993

---

### Find out for yourself:

- What does 'Dungir' mean in the language of the Gumbaynggir?
- Why was Mistake State Forest so named?
- Who are the rightful owners of this land?
- Are the soils erodable?
- Is the area prone to landslip?
- What is the vegetation like?
- Is there really some low altitude subtropical rainforest?
- Is there any 'Old Growth' forest left?
- Are there any special animals or plants?
- Is the Forestry Commission really logging rainforest and old growth forest?

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**ORDER FORM:** Please send me a copy of the Dungir Conservation Proposal, I have enclosed a cheque / money order for \$30 per copy (includes postage) made payable to the Nambucca Valley Conservation Association (PO Box 123, BOWRAVILLE NSW 2449).

Name: .....	Phone Number: .....
Address: .....	No. Copies: .....
.....	
.....	
.....	Signature: .....



North Arm Landcare Group

North Arm Rd,

Bowraville

N.S.W 2449

9.8.93

Dear Nefa,

Please find enclosed copies of letters sent to the Forestry Commission Murrumbidgee Office, Threatened Species Unit NPWS Syd. & CALM (Kempsey) for your interest.

We have not yet received a response from any of the correspondence, although I have been in phone contact a few times with Daniel Connelley of the Threatened Species Unit & have found him to be sympathetic & hopefully will initiate some positive action in the near future.

Logging in 207 is temporarily suspended as all crews have been moved onto Mistake.

Regards

Paula

Paula Flack

ph. 065 644058

p.s. Sorry we couldn't send photos

North Arm Landcare Group,  
North Arm Road;  
BOWRAVILLE NSW 2449

26th July, 1993

District Forester,  
Urunga Forestry Commission Office,  
Bowra Street,  
URUNGA NSW 2454

Attention: Mr. Steve Rayson

Dear Steve,

RE: COMPARTMENT 207 - CROOKED TOP MOUNTAIN

On Sunday 13th June a group of local people, including an aboriginal elder from Bowraville, nearby landholders and members of North Arm Landcare Group, visited Compartment 207, Crooked Top Mountain to view the effects of the then current logging operations.

Since then I, along with several other concerned people have visited different sections of the Compartment on various occasions.

A number of concerns have arisen from our observations. They are as follows:-

1. As you are aware koala scats were found on our original visit and were positively identified by Barbara Triggs. A copy of her analysis form was faxed to your office on Friday 9th July, 1993 and you have acknowledged, per phone on Tuesday 13th July, 1993 that it was received.

We have since communicated with the N.P.W.S. Threatened Species Unit and requested that they ask Forestry Commission for a koala survey to be carried out, using the 'asterisk' technique, with a N.P.W.S. officer present, as soon as possible, to establish whether or not a koala population does exist on Crooked Top Mountain.

Please note that on 16th July, 1993 a dead koala was found one kilometre from the compartment boundary. N.P.W.S. has been notified.

In view of the statement noted in the E.I.S. for 207, Part B Determination of Impact on Protected Fauna (b) "The greatest impact will be caused to arboreal species", we believe you, as the responsible Forestry Officer, should upgrade the prescription in the Harvest Plan for koalas to at least the standard and style of the Wingham Determination prescription for koalas, as an interim measure until the survey is completed and the adequacy of that prescription is assessed. This will ensure more undisturbed habitat and food trees are left standing.

## 2. HABITAT TREES

(i) Many habitat trees were seen on road edges or in close proximity to log dumps. These areas are not only in the 'firing line' during logging operations, but are used at other times by 4WD enthusiasts, bush walkers, campers and tourists. They therefore are not necessarily the most appropriate sites for nesting birds, marsupials and bats or roosting koalas. Roads and snig tracks also provide easy access and travelling for feral dogs, as the number of dog scats found during our field days would suggest. This would seriously disadvantage animals already in residence. We therefore request that in the remaining unlogged areas habitat trees be marked in sheltered off road locations.

(ii) A number of inadequate habitat trees have been seen and photographed. An example of which has been included, reference PHOTO (1). These trees do not fit the criteria set out in the Harvest Plan reference 3.3(f) "The retention of mature or overmature hollow bearing stems, to provide for the habitat requirements of hollow dependent fauna".

Good habitat trees with suitable hollows, and due to be logged, were seen in close proximity to the unsuitable ones marked 'H'. This appears to contradict your advice per phone of 30th June, 1993 when you stated to me that "such apparently inadequate trees may be marked as habitat trees if no suitable trees could be found in the vicinity". We request that all such inadequate habitat trees be located and a more suitable one found in the vicinity to be marked 'H'.

(iii) Extreme disturbance of understory and leaving of trashed tree tops below habitat trees reference PHOTO (2). This situation is unacceptable and severely disadvantages fauna attempting to access or leave tree as the sheltering understory has been destroyed.

Please note that N.P.W.S., through the Wingham Determination, who are the experts, believe such understory between clustered 'H' trees should be retained. We request you ammend your policy in this regard throughout all of Urunga Management Area and specifically ammend the Harvest Plan for Compartment 207 along these lines.

(iv) Habitat trees damaged from felling of nearby trees, resulting in loss of limb, ie potential nesting sites and foliage (ie food!) reference PHOTO (3). This situation seems to indicate that insufficient due care was taken during felling.

Photographic examples of inadequate habitat trees, and destruction of and trashing around understories of habitat trees, have been forwarded to N.P.W.S.

### 3. EROSION

Early roading, in particular the south west and south roads on southern side of compartment appear to have numerous deficiencies in regard to drainage, with resultant early signs of erosion and slumping despite minimal rainfall (54mm from 1st May - 13th June) reference PHOTOS (4) and (5) taken on 13th June, 1993.

We request, urgently, that the Harvest Plan for compartment 207 be amended to include a Soil Erosion and Sediment Control Strategy prepared under the principles of the Standard Erosion Mitigation Guidelines (5th March, 1993) and reviewed by Department of Conservation and Land Management and deemed adequate by them before logging proceeds. Please note we have informed C.A.L.M. of our concerns.

We have observed roading and snig tracks crossing drainage lines without any appropriate provision for movement of water. This is of extreme concern as even the S.E.M.C.'s state:

#### 2. CONDITIONS FOR LOGGING

##### 2.1.1. Minor Roads

- (vi) Minor roads shall not cross streams which are running unless a causeway, bridge or pipe culvert designed to transmit peak flows has been provided. They may cross stream beds which are dry via causeways, temporary culverts or temporary log crossings provided there is minimal disturbance to the surrounds.

We have observed a snig track crossing a drainage line where not only was there no form of drainage provided under, over or along trackside to nearest crossbank, but resulted in extensive rock spills down the watercourse into the gully below.

We believe this to be a breach of the above mentioned S.E.M.C. condition.

Reference PHOTO (6) : Showing a snig track over the drainage line, with resultant rock spill.

PHOTO (7) : A close up of the rock spill into the gully.

PHOTO (8) : Taken from below snig track looking down gully, to show extent of rock spill and interference to natural water flow which inevitably will occur.

This too has been reported to C.A.L.M. but we ask that you take appropriate action according to your Statutory responsibilities and inform us of your course of action.

4. CROSSBANKS

The S.E.M.C. 2.1.1. Minor Roads (iii) states:

"For any operation the height of the crossbanks shall be 0.5m unless otherwise specified."

Nowhere in the Harvest Plan is there any other specifications regarding deviation from the 0.5m crossbank height. Crossbanks in 207 are often seen to be much higher up to 2m and involve excessive movement of surrounding earth to construct. Reference PHOTOS (9) and (10). Why has this occurred?

The fact that they have dug down into the rock substrata to build up excessively high crossbanks has the potential to create additional and unnecessary erosion. We are very concerned about this practice.

We believe most of Crooked Top (Compartment 207) to be too steep to be logged and that the damage and potential for serious erosion and siltation of watercourses, far outweigh the viability of harvesting approximately 115 ha.

We await your prompt reply.

Yours faithfully,

P. FLACK  
SECRETARY

Enc.

North Arm Landcare Group,  
North Arm Road,  
BOWRAVILLE NSW 2449

5th August, 1993

Threatened Species Unit,  
National Parks & Wildlife Service,  
P.O. Box 1967,  
HURSTVILLE NSW 2220

Attention: Mr. Daniel Connelly

Dear Daniel,

RE: FORESTRY COMMISSION LOGGING IN COMPARTMENT 207  
CROOKED TOP MOUNTAIN

On Sunday 13th June, a group of local people, including an aboriginal elder from Bowraville, nearby landholders and members of North Arm Landcare Group, visited Compartment 207, Crooked Top Mountain to view the effects of the then current logging operations.

Since then I, along with several other concerned people have visited different sections of the Compartment on various occasions.

A number of concerns have arisen from our observations. They are as follows:-

1. As you are aware koala scats were found on our original visit and were positively identified by Barbara Triggs. A copy of her analysis form was faxed to your office on Friday 9th July, 1993.

Forestry Commission District Forester, Mr. Steve Rayson has informed me that no routine day or night time fauna survey was carried out in Compartment 207 prior to commencement of harvesting nor has there been any sort of inspection or survey done specifically for koalas since they were notified by us via telephone and fax, as to the evidence of koala presence within the compartment and surrounding area.

Please note a recently deceased female koala was discovered approximately one kilometre from compartment boundary, on Friday 16th July. No apparent cause of death could be found. N.P.W.S. Dorrigo Office were notified and map references given. Refer PHOTO (1).

The Harvest Plan prescription for koalas is totally inadequate and states:-

### 3.13 Additional Prescription

- vi) Should any koalas be discovered during operations then an area of 100 metres surrounding the tree containing the koala shall be reserved from logging pending an inspection by a forest officer to determine whether or not other koalas are present.

The prescription for koalas in the E.I.A. for 207 also is appallingly insufficient and is as follows:-

Part B Determination of Impact on Protected Fauna.....

Mammals

(i) Koalas

Koalas may well be present within the compartment although none were sighted during inspections of the area. If located within the logging area, the district Koala protocol will be followed. This protocol is as follows;

"Where a koala or recent evidence of a koala in a tree is located the tree will be retained together with all other trees within a radius of 100 metres pending an inspection by a forest officer to determine whether or not other koalas are present in the vicinity.

Where it is determined that a resident colony is present, the area of the colony plus a radius of 20 metres will be preserved whenever the colony is present.

Where only one or two koalas are present, a 20 metre radius around each occupied tree shall be preserved whenever the koalas are present. Note, a colony is considered to consist of three or more koalas within the area being investigated (radius 100m)."

The fact that trees with koalas present in them are retained only while the koalas are in situ and subsequently felled once they (hopefully of their own accord!) move on, suggests Forestry Commission, or at the least, the forest officer (Mr. John Ball) responsible for setting the koala prescription, has an inadequate knowledge and understanding of habitat requirements for this highly specialized animal.

2. Many habitat trees were seen on road edges or in close proximity to log dumps. These areas are not only in the 'firing line' during logging operations, but are used at other times by 4WD enthusiasts, bush walkers, campers and tourists. They therefore are not necessarily the most appropriate sites for nesting birds, marsupials and bats or roosting koalas. Roads and snig tracks also provide easy access and travelling for feral dogs, as the number of dog scats found during our field days would suggest. This would seriously disadvantage animals already in residence. We therefore ask that N.P.W.S. require Forestry Commission to mark more habitat trees in sheltered, off road locations in the remaining unlogged areas.

3. A number of inadequate habitat trees have been seen and photographed. An example of which has been included, reference PHOTOS (2, 3, 4, 5). These trees do not fit the criteria set out in the Harvest Plan reference 3.3 (f) "The retention of mature or overmature hollow bearing stems, to provide for the habitat requirements of hollow dependent fauna".

Good habitat trees with suitable hollows, and due to be logged, were seen in close proximity to the unsuitable ones marked 'H'. This appears to contradict advice given to me by Mr. Steve Rayson per phone on 30th June, 1993 when he stated to me that "such apparently inadequate trees may be marked as habitat trees if no suitable trees could be found in the vicinity". We request that N.P.W.S. require Forestry Commission to locate all inadequate habitat trees and more suitable ones be found in the vicinity to be marked 'H'.

4. Extreme disturbance of understory and leaving of trashed tree tops below habitat trees reference PHOTO (5). This situation is unacceptable and severely disadvantages fauna attempting to access or leave tree as the sheltering understory has been destroyed.

As you are aware N.P.W.S., through the Wingham Determination, believe such understory between clustered 'H' trees should be retained.

5. Habitat trees damaged from felling of nearby trees, resulting in loss of limb, ie potential nesting sites and foliage (ie food!) reference PHOTO (7). This situation seems to indicate that insufficient due care was taken during felling.
6. Reference PHOTO (8) - (Eight photo series). This 360° photo series shows a small section of an area where logging has been completed.

Please note extensive understory damage and the only two habitat trees (marked with a yellow H), which are obviously inadequate.

Reference PHOTO (9). Gives a full view of these two above mentioned 'habitat trees'.

In view of the above concerns, in particular Point 1, we request that Forestry Commission's licence conditions for harvesting in 207 be upgraded to at least the standard and style of the Wingham Determination for koalas, with or without a koala survey being carried out. This will ensure that more undisturbed habitat and food trees are left standing.

A copy of this letter has been forwarded to Robert Quirk, Head Ranger at the Dorriggo N.P.W.S. office.



We hope that you can give this matter your prompt attention and keep us informed of any developments.

Yours faithfully,

P. FLACK  
SECRETARY

Enc.

North Arm Landcare Group,  
North Arm Road,  
BOWRAVILLE NSW 2449

26th July, 1993

Department of Conservation and Land  
Management,  
P.O. Box 117,  
KEMPSEY NSW 2440

Attention: Mr. Rod Saul

Dear Rod,

RE: FORESTRY COMMISSION LOGGING IN COMPARTMENT 207 - CROOKED TOP  
MOUNTAIN

On Sunday 13th June, a group of local people, including an aboriginal elder from Bowraville, nearby landholders and members of North Arm Landcare Group, visited Compartment 207, Crooked Top Mountain to view the effects of the then current logging operations.

Since then I, along with several other concerned people have visited different sections of the Compartment on various occasions.

A number of concerns have arisen from our observations. They are as follows:

- (i) Early roading, in particular the south west and south roads on southern side of compartment appear to have numerous deficiencies in regard to drainage, with resultant early signs of erosion and slumping despite minimal rainfall (54mm from 1st May - 13th June) reference PHOTOS (1), (2), (3), (4A) and (4B) taken on 13th June, 1993. All taken on the south west road on southern facing.

We request, urgently, that the Harvest Plan for Compartment 207 be amended to include a Soil Erosion and Sediment Control Strategy prepared under the principles of the Standard Erosion Mitigation Guidelines (5th March, 1993) and reviewed by Department of Conservation and Land Management and deemed adequate by them before logging proceeds.

- (ii) We have observed roading and snig tracks crossing drainage lines without any appropriate provision for movement of water. This is of extreme concern as even the S.E.M.C.'s state:

## 2. CONDITIONS FOR LOGGING

### 2.1.1. Minor Roads

- (vi) Minor roads shall not cross streams which are running unless a causeway, bridge or pipe culvert designed to transmit peak flows has been provided. They may cross stream beds which are dry via causeways, temporary culverts or temporary log crossings provided there is minimal disturbance to the surrounds.

We have observed a snig track crossing a drainage line where not only was there no form of drainage provided under, over or along trackside to nearest crossbank, but resulted in extensive rock spills down the watercourse into the gully below.

We believe this to be a breach of the above mentioned S.E.M.C. condition.

- Reference PHOTO (5A) : Showing a snig track over a drainage line with resultant rock spill.  
PHOTO (5B) : Close up highlighting the rock spill into the gully below.  
PHOTO (5C) : Taken from the gully below snig track showing lack of drainage under crossing.  
PHOTO (5D) : Taken again in the gully below snig track 180° from (5C) angle to show extent of the rock spill.  
PHOTO (6) : A second example of road crossing and drainage line and lacking appropriate construction to minimise scour and erosion.

(iii) Crossbanks

The S.E.M.C. 2.1.1. Minor Roads (iii) states:

"For any operation the height of the crossbanks shall be 0.5m unless otherwise specified."

Nowhere in the Harvest Plan is there any other specifications regarding deviation from the 0.5m crossbank height. Crossbanks in 207 are often seen to be much higher up to 2m and involve excessive movement of surrounding earth to construct. Reference PHOTOS (11) and (12).

The fact that they have dug down into the rock substrata to build up excessively high crossbanks has the potential to create additional and unnecessary erosion. We are very concerned about this practice.

- (iv) PHOTOS (7), (8), (9) and (10) are examples of some of the inadequate roading we have observed which quite obviously will result in erosion when the next wet season arrives in six months time.
- (v) Batters in very steep sections of the road have extended far down the slope below swallowing young trees on the way. They too will result in considerable erosion when the rainy season arrives in spring/summer, as little regrowth can be expected in the current season.

Reference PHOTOS (13), (14) and (15).

We therefore request that Forestry Commission be directed to carry out revegetation of all such batters as stated in the S.E.M.C.

2. CONDITIONS FOR LOGGING

2.1.1 Roads

- (ii) Revegetation of batters may be required on some roads, and this shall be carried out when specified.

We understand that roading of compartments is often carried out prior to the Harvest Plan and E.I.S. being approved. Is this so? If so, why is this allowed, when roading, particularly, in steep compartments such as 207 causes such extensive damage?

We believe most of Crooked Top Mountain to be too steep to be logged.

The Harvest Plan states:

2.7 Slope

Slopes within the logging area are steep to very steep. Approximately 15% of the area is above 35° of slope and will not be logged. Of the remainder 50% is estimated to be between 25° and 35° and 35% is estimated to be less than 25°.

Damage and the potential for serious erosion and siltation of watercourses far outweigh the viability of harvesting approximately 115 ha.

Please reply urgently. We await your response.

Yours faithfully,

P. FLACK  
SECRETARY

Enc.

REVIEW OF STATE FOREST'S MANAGEMENT OF  
MISTAKE STATE FOREST.

D. Pugh, February 1993

"People do expect that their Australian Forest Services and their Australian Forest Industries, together, will conserve, in never ending benefit to them, both the Australian timberlands and their commerce.

If there be disagreement between the strategy of the one and the tactics of the other, the battle is at hazard. The community for which the war was lost may be entitled to put a disagreeable end to its disagreeing generals, at the disagreeing ends of the cross-arms of the nearest lamp post." Mr. E.H.F. Swain, Forestry Commissioner, N.S.W. 1937.

Macksville Management Area is one of those claimed to be managed on a sustained yield basis, though in practice this is not the case. An investigation of the management plan, yield assessment and annual reports reveal inflated assessments, gross overcutting and contempt for the Management Plan that is meant to be abided by.

In summary mis-calculations and mis-management have led to:

- \* gross overcutting of quota sawlogs, in in the six years from July 1987 to July 1993 the average annual quota removal was 9 660 cu. m. net., representing an average annual overcut of 1 860 cu. m. net (24%), exceeding the annual limit by as much as 43% in 1987/88.
- \* actual yields being significantly below predicted yields by up to 50%.
- \* premature cutting of quota resources for the second cutting cycle (after 1995), which will lead to significant future shortfalls.
- \* failure to abide by the Macksville Management Plan's order of working and cutting limits, and
- \* Failure to manage the area's forests on a sustainable yield basis, with no real attempt to manage them on an ecologically sustainable basis.

It is clear that up until 1984/85 the Macksville MA was operating at a significant annual loss. In 1984/85 it was amalgamated with Bellinger and Urunga MAs for management purposes and the profitability of the combined management areas jumped, with the Macksville MA reportedly returning a profit for the first time ever. Profitability plummeted and the MAs again suffered significant losses. The passage of the Forestry Amendment Act, which paid off the Forestry Commission's accumulated debts, federal funding and gross overcutting all contributed to the MA again showing a profit in 1988/89. This dropped to a very marginal profit in 1990/91 when the federal funding ceased.

In the seven years 1984/85 to 1990/91 the Urunga Management Area (including Macksville MA) returned an average of less than \$0.87 for each cubic metre (gross) of timber extracted from the forests. Assuming an annual timber growth increment of 1 cu. m. gross per hectare this

represents a very poor return to the public on a public asset - in fact once all costs, direct and indirect subsidies and the loss of public capital are factored in it is evident that the public are paying a substantial subsidy to the industry for public forests to be degraded.

The economics of the State Forests' Macksville MA and Urunga MA operations do not enable them to manage State Forests as required. The State Forests are not able to replant many areas where regeneration has failed, they are unable to afford many of the materials they require, they are unable to control weeds, they cannot afford to acceptably maintain fire trails, roads and bridges, nor can they maintain recreational facilities adequately or expand facilities.

When the present overcutting is stopped, the yields of non-quota timber further reduced (present levels are unsustainable) and the Up River forests cut out the profitability of the Macksville and Urunga Management Areas will significantly worsen. Correspondingly the long term problems, such as weed infestations, failed regeneration and serious erosion, will need increased labour and resources to control. It is evident that the State Forests will not be able to undertake the maintenance required or develop recreational facilities. The Up River forests will be abandoned to their fate and environmental degradation will continue. It is doubtful that the coastal forests will even be able to be managed economically unless there is a restructuring of management, log pricing and the industry.

This preliminary report is a review of resource and economic issues as they are dealt with in State Forests' Management Plan for the Macksville Management Area and Annual Management Plan Reports for the past 13 years. This is a review of the information presented, with some interpretation of data. The aim is to provide an overview of timber resources and economic performance.

Mistake State Forest is within the Macksville Management Area, this was partly absorbed into the Urunga Management Area for management purposes in 1984/85 and completely in 1988/89. This arrangement has yet to be formalised by the abolition of the Macksville MA or the adoption of a revised Management Plan.

## 1 RESOURCES

The majority of the sawlogs being taken from north east NSW's public forests are coming from old-growth forests. In those State Forest Management Areas which have not already cut-out their old-growth forests they are committed to logging all the accessible stands that remain. Logging of these forests has traditionally been based on "maximum economic utilisation" (sometimes mis-named "selective logging") where most trees of economic value are taken, with token habitat trees retained, machinery not allowed within 20 metres of larger streams (unless authorised by the foreman) and slopes over 35 degrees left unlogged. In poorer forest types, where there is no woodchipping, a significant number of older trees may be retained but on better quality sites the forests are virtually clearfelled.

In those Management Areas where extensive tracts of old-growth forest no longer remain logging is focusing on pockets of lightly logged or unlogged forest left in areas not previously considered economical to

log. Many of these areas are in gullies or on steep slopes, thus greatly magnifying the impacts of logging (increasing erosion, stream sedimentation, and loss of old-growth dependent species relying on these pockets as refuges).

Logging is being intensified in the cut-over forests as "integrated logging" begins to dominate. In previously logged forests this involves scavenging better trees left behind in previous operations for sawlogs and taking most of the rest, along with regrowth thinnings, for woodchipping. Old-growth forests are also increasingly being subjected to integrated logging.

More recently concerted pressure from the conservation groups in the Nambucca area has forced the National Parks and Wildlife Service to take their responsibilities more seriously and through this forced State Forests to retain more fauna habitat components. Similar pressure on the Environment Protection Authority and the Department of Conservation and Land Management (arising out of the exposure of extensive erosion and pollution of the Bellinger River due to breaches of inadequate logging prescriptions in Oakes State Forest) has also led to an improvement in soil conservation measures. Unfortunately these have still not gone far enough and there is still a need for the implementation of further conservation measures and more importantly the reservation of areas required for the "comprehensive, adequate and representative" reserve system demanded by the National Forest Policy Statement.

#### 1.1 OLDGROWTH FOREST LOGGING

The Resource Assessment Commission (1992a) estimates that in Australia 11% of hardwood sawlogs and 23% of hardwood pulpwood removed from native forests come from old-growth forests, with some 48% of New South Wales' hardwood sawlogs coming from old-growth forests.

The Resource Assessment Commission (1992a) found old-growth forests were important to industry for three reasons:

- (i) they represent a significant part of forests available for conversion to production forest;
- (ii) the old-growth resource is cheaper because it has neither the establishment costs of plantations nor the management costs of regrowth; and,
- (iii) many sawmills are designed to handle old-growth timber.

The cessation of old-growth forest logging on a national basis was estimated by RAC (1992a) to result in a reduction of overall hardwood sawlog availability from 5 million cubic metres per year to 4 million cubic metres per year (or 3 million cubic metres per year if "mature" forest is included), whereas "business as usual" was expected to result in a reduction to the same level of cut by the year 2040. Over this 40 year period timber industry employment is predicted to decline by 16% under the "business as usual" scenario and by 17% with no more logging of mature and old-growth forests.

In many areas logs from regrowth forest have been a major component of milling operations for many years and in other areas the transition from

old-growth forest to regrowth forests has been achieved without great difficulty (RAC 1992a).

It is estimated that only 6% to 10% of hardwood sawlog production is currently used for appearance grade timber (RAC 1992a). As noted by Smith (1991a) "harvest of the limited remaining, ecologically valuable ... areas of oldgrowth forest is continuing in order to maintain supply of low value scantling (housing frame) and pulpwood products. This approach not only ignores market opportunities, but appears particularly short sighted in view of the forecast glut of softwood which is expected to collapse the already failing hardwood scantling market within the next 15 years."

## 1.2 SUSTAINING YIELDS

One of the prime motivations for the creation of the Forestry Commission expressed in the 1907 Royal Commission of Inquiry on Forestry was the dwindling timber resources and the need to sustain them into the future (PAC 1990). In 1980 the former Commissioner for Forests, Dr. S.W. Gentle noted that there were many management areas not being logged on a sustained yield basis and emphasised the need to bring operations onto sustained yield (PAC 1990).

Before the present restructuring there were 56 native forest management areas in NSW, of which the Forestry Commission estimated 44 are being managed on a sustained yield basis, with the remaining 12 expected to be brought onto a sustained yield basis during the 1990's (RAC 1992b). The current annual quota commitments of native sawlogs to the timber industry of 689 000 cubic metres net is expected to be reduced by 84 000 cubic metres this decade as part of this strategy (RAC 1992b). As is evidenced by the discussion below even MAs that are claimed to be on sustained yield aren't due to the inadequacies of resource assessments.

The Forestry Commission's concept of sustained yield is to maintain the same volumes of timber in perpetuity but not the same sized or quality timber (PAC 1990). In most horth east NSW Forestry Commission Management Areas this strategy has, or will, result in the old-growth forests being cut out and then sawlog quotas being virtually eliminated for some years or decades, or drastically reduced to a level they guess will be sustainable.

The Forestry Commission use rough estimates of standing resources, and limited growth plot measurements to estimate future timber availability from state forests. Models that are used to determine future sustainable yields are suitable for single species and single aged plantations but unsuitable for native forests (PAC 1990, RAC 1992a), where estimations of future wood availability have been noted by CSIRO to vary by as much as 50% (RAC 1992a).

The NSW Public Accounts Committee (PAC 1990) notes:

"In the long-term, sustainable harvesting is in the industry's best interest, but in the short-term many mills would prefer to process tomorrow's timber today, gaining tomorrow's profit today, then relocate once the resource is too degraded to be useful. Under these circumstances, it would be naive not to recognize that short-term



economics is in direct conflict with regulation and the principle of sustained yield."

Sustained yield is an economic rather than an ecological principal, and thus does not ensure that the nature, character, or species composition of a forest is maintained (PAC 1990). To ensure proper account is taken of environmental values we need ecologically sustainable logging.

The overcommitment of timber resources precludes the introduction of ecologically sustainable management practices (e.g. Smith 1991a). Smith (1991a) recommends limiting guaranteed allocations of timber to industry to a maximum of 50% of the long-term sustainable yield for a supply region so as to allow for unforeseen circumstances and improved management practices.

As has been proven in court a number of times over recent years, and was graphically illustrated by GaLM's (Atkinson et. al. 1992) report on Oaks State Forest, the Forestry Commission's logging prescriptions are inadequate and inadequately complied with. They do not ensure that the environmental values of forests (water, soils, flora and fauna) are sustained and not significantly degraded. The Resource Assessment Commission (1992a) recommends independent audits of the adequacy of forest codes of practices and their enforcement. The adoption of adequate logging prescriptions will have a significant effect on volumes of timber obtainable from forests.

### 1.3 TIMBER RESOURCES OF THE MACKSVILLE MANAGEMENT AREA AND MISTAKE STATE FOREST.

Macksville Management Area is one of those claimed to be managed on a sustained yield basis, though in practice this is not the case. Like most other Management Areas claimed to be on sustained yield an investigation of the management plan, yield assessment and annual reports reveal inflated assessments, gross overcutting and contempt for the Management Plan that is meant to be abided by.

In summary mis-calculations and mis-management have led to:

- \* gross overcutting of quota sawlogs, in the six years from July 1987 to July 1993 the average annual quota removal was 9 660 cu. m. net., representing an average annual overcut of 1 860 cu. m. net (24%), exceeding the annual limit by as much as 43% in 1987/88.
- \* actual yields being significantly below predicted yields by up to 50%.
- \* premature cutting of quota resources for the second cutting cycle (after 1995), which will lead to significant future shortfalls,
- \* failure to abide by the Macksville Management Plan's order of working and cutting limits, and
- \* failure to manage the area's forests on a sustainable basis.

Based on 'Hardwood Assessment - Macksville M.A. Coastal Working Circle' (Forestry Commission 1979) the Forestry Commission (1978, as amended to 1987) estimated the yields available from the Macksville MA as from 1982,

though noted that the "derived volumes have limited accuracy". It was estimated that there was a total of 171 730 cu. m. gross of sawlogs over 40 cm. diameter (dbh) available after 1982 from the Coastal Working Circle for the first cutting cycle (giving a net annual yield of 7 730 cu. m.) and a total of 71 100 cu. m. gross (34 000 cu. m. net) of merchantable quota sawlogs in the 'Up River Forests', anticipated to be utilized by 1982.

Mistake State Forest was arbitrarily divided into the Up River and Coastal Working Circles. Mistake SF was estimated to contain 24 800 cu. m. gross (12 000 cu. m. net) of the sawlog volumes in the 'Up River Forests'. It was assessed as containing 51,943 cu. m. gross of the sawlogs available from the Coastal WC for the first cutting cycle (CC1) which was to last until 1995. Timber available from the Coastal WC for the first cutting cycle was to come from 'Stand Condition Types' A and B, with type C reported as:

"Suitable for sawlog production but stands immature for quota sawlog harvesting - quota sawlogs not available for practice economic harvesting until second cutting cycle (beyond 1995)." (FC 1979)

The quotas for sawlogs in the Macksville MA were set as 1978/79-1979/80 26 880 m. cu. net, 1980/81-1981/82 8 000 cu. m. net (FC 1978 p2, p24) and as from 1982/83 "The annual yield shall not exceed the total of annual quota commitments" of 7 800 cu. m. net (FC 1978, as amended 1982, p24).

The Forestry Commission (1978) note:

"The up river forests mainly consist of logged areas carrying 0-20 year old regeneration as a result of logging, with a few virgin stands. These forests are very deficient in intermediate size classes. It is estimated that available merchantable logs will be harvested by about 1986 some 40 years before any existing regeneration can produce sawlogs." (pp17-8)

"Timber production objectives shall be met by concentrating harvesting in the economically accessible hardwood resource of the virgin up river forests. On completion of harvesting of this resource, logging will be confined to the coastal forests." (p.22)

"The option of timber production from the up river forests after the current cutting cycle will not be actively pursued in the foreseeable future. Expenditure associated with road construction, maintenance, protection and silvicultural treatment will be kept to a minimum." (p23)

The combination of wet weather, Allen Taylors not being satisfied with the species available (eg. FC 1982/83) and the Forestry Commission's financial losses led to an abandonment of the Management Plan's intent to log out the Up River forests before concentrating on the Coastal Working Circle.

The Forestry Commission's intention not to manage the Up River forests on a sustained yield basis is still current, their only concern being to maximise what they can cut in order to "try and find sufficient quota to maintain the 7 800 m3 sustained yield cut longer than the end of CC1" (FC 1988/89)

The Forestry Commission's Annual Reports make a number of comments on the yield assessments: "It should be noted that segregation into the strata used in the assessment is virtually impossible to achieve" (FC 1981/82), "It would appear from data presented that there is a broadening gap between actual and predicted yields for the total coastal working circle. ... it would appear that for Mistake S.F. at least, the stand condition typing on which the assessment is based is proving unreliable." (FC 1985/86), "The major problem remains the gaps between actual and predicted yields on Ingalba and Mistake S.F.s. ... Assessment was done using random plots and it could be they did not sample enough of the poorer country. This coupled with the forest being cut over at so many different periods could produce the wrong information." (FC 1986/87), "... the whole question of sustained yield after [unlogged areas are] exhausted needs to be tackled as a separate issue, probably involving measurement of a better defined resource.", "The question of what actually should constitute the CC1, CC2 and CC3 sustainable area needs to be resolved, sooner rather than later due to the poor results being achieved compared to that assessed." (FC 1987/88)

TABLE 1. HARDWOOD (NON-RAINFOREST) REMOVALS FROM MACKSVILLE MANAGEMENT AREA. Source: respective Forestry Commission Annual Reports.

YEAR	QUOTA CUT m3 net	QUOTA CUT m3 gross	NON-QUOTA SAWLOGS m3 gross	OTHER
1981/82	8 600	10 581	6 668	1 724
1982/83	7 606	10 650	450	5 474
1983/84	3 678	4 787+	9 190	3 457
1984/85	8 448	11 827+	19 825	4 749
1985/86	8 934	12 507+	23 084	7 905
1986/87	7 640	10 696+	24 573	5 250
1987/88	11 167	14 447	16 705	7 072
1988/89	9 540	12 059	20 492	5 262
1989/90	9 433	13 020	24 871	5 590
1990/91	10 588	15 323	21 548	5 231
1991/92	8 624	12 615	15 560	5 103
1992/93	8 610	12 085	10 948	6 306

+ These volumes estimated by applying a multiplier of net to gross of 1.4: The average conversion factor of gross to net used in Annual Reports over the period 1987/88 to 1990/91 was 0.744 (range 0.691-0.791).

As from 1988/89 the Macksville MA was subsumed by the Urunga MA for management purposes. The Urunga MA Annual Reports continued to emphasise the inadequacy of the resource assessments in the Macksville MA: "A proper assessment of all the resource is required", "... yields being obtained on Coastal areas are of great cause for concern." "... CC2 (27 years) cut needs to yield over twice the CC1 cut to achieve predicted yields. Whether this will occur is completely unknown as no follow up assessment of stand structure remaining, as required by CUTAN monitoring, has ever been done." (FC 1988/89), "... a complete assessment of the districts timber resources is urgently required and is a priority." (FC 1990/91), "Reassessment of the resources is required and supported... It is expected that this work will be undertaken during 1994" (FC 1991/92).

Since 1982 the actual yields from the Coastal Working Circle have been slightly below the assessed yields (FC 1979) for Nambucca and Way Way State Forests, almost half the assessed yields for Ingalba State Forest and significantly higher for Mistake State Forest (FC 1989/90). While this would appear to give an overall favourable result this disguises the fact that it has involved the premature harvesting of trees meant to be retained for the second cutting cycle (CC2, after 1995): The Forestry Commission (1989/90) note that the 1979 Yield Assessment assumed that only Strata A and B would be cut in CC1, whereas Strata C has also been harvested (see above).

The practice has been to log the most productive stands first (FC 1988/89, p11) indicating that the deficiency in actual yields will worsen into the future.

TABLE 1.2 SAWLOG QUOTA (NON-RAINFOREST) REMOVALS FROM MACKSVILLE MANAGEMENT AREA. Source: respective Forestry Commission Annual Reports. All figures in cubic metres net.

YEAR	ALLOWABLE QUOTA CUT	ACTUAL QUOTA CUT	DIFFERENCE	% OVER CUT
1981/82	8 000	8 600	+ 600	8%
1982/83	7 800	7 606	- 194	-
1983/84	7 800	3 678	-4 122	-
1984/85	7 800	8 448	+ 648	8%
1985/86	7 800	8 934	+1 134	15%
1986/87	7 800	7 640	- 160	-
1987/88	7 800	11 167	+3 367	43%
1988/89	7 800	9 540	+1 740	22%
1989/90	7 800	9 433	+1 633	21%
1990/91	7 800	10 588	+2 788	36%
1991/92	7 800	8 624	+ 824	11%
1992/93	7 800	8 610	+ 810	10%
TOTALS	93 800	102 868	+9 068	
TOTAL OF OVERCUTS			13 544	

It is evident from Table 1.2 that the State Forests have been grossly overcutting in the Macksville Management Area in breach of the cutting limits specified in the Management Plan. In the 12 years from July 1981 to July 1993 the cut of quota sawlogs allowable under the Management Plan were exceeded in 9 years, by up to 43%. Most alarming is that in the six most recent years (for which figures are available) from July 1987 to July 1993 the average annual quota removal was 9 660 cu. m. net., representing an average annual overcut of 1 860 cu. m. net (24%), exceeding the annual limit by as much as 43% in 1987/88. The significant overcutting in the last six years should be of considerable concern as it represents a total overcut of 11 162 cu. m. net, or almost one and a half years worth of quota.

When this overcut is considered in conjunction with the fact that anticipated yields per hectare have only been maintained by taking timber meant to be retained for the next cutting cycle and logging the most

productive stands first it indicates significant yield problems for the Macksville MA in the near future.

While no assessment of the future availability of non-quota sawlogs and durable poles is available it is apparent that these resources too are not being managed on a sustainable basis and their availability is expected to rapidly decline in the near future.

When Trevor Bailey obtained an injunction in 1987 to stop logging in some Up River compartments in Mistake State Forest the Forestry Commission "maximised" their cutting rate in the Coastal WC part of Mistake SF (FC 1988/89), until the court judgement on March 31st 1989 caused them to suspend logging operations in Mistake State Forest until an EIS was prepared.

TABLE 1.3 The Forestry Commission's (1988/89) "best current estimate of remaining identified resource" in Mistake State Forest was given as:

	GROSS AREA	NET Quota/Ha.	TOTAL
Mistake (southern)	340	14.3	4850
Mistake (northern)	916	4.4	4050
TOTALS	1256	7.1	8900

Despite all the identified failings of the resource assessments in the Urunga Management Area (including the Macksville MA) the State Forests commission is pressing ahead with its revised (long overdue) Management Plan and the Urunga-Coffs Harbour Environmental Impact Statement without undertaking a reliable yield assessment. The undated document prepared by State Forests for the EIS consultants states:

"Only the coastal forests have been assessed for quota sawlog yield. The plantation resource has been the subject of a yield scheduling exercise using data collected from previous growth and inventory work and past yields. All other areas have had estimates of various products availability made where sufficient information from past yields allows such estimation to be reasonably accurate."

The State Forests seem intent to cover up their gross overcutting and the identified resource shortfalls in the coastal forests, and ignore the premature cutting of resources identified for the next cutting cycle and that their yield assessments for the Up River forests are unreliable. Their intention is not to undertake a valid yield assessment until some time in the future, in the mean time they intend to continue unsustainable logging of quota sawlogs from the Urunga MA at the prescribed rate of 25,520 cu. m. per annum.

## 2.0 STATE FORESTS ECONOMICS

As noted by the Public Accounts Committee (1990):

"... native forest asset valuations really only consider replacement costs, a satisfactory inventory of native forests is lacking, there is no accounting for the non-timber values inherent in the native forest, ... and numerous subsidies enjoyed by the Commission ... are not quantified in the accounts." (p21)

"The State's timber processing industry is heavily subsidised by the public sector. Chief among the subsidies are under priced raw materials (in the case of Eucalypt logs), and failure to bear the full costs of road construction and maintenance which are attributable to the industry's operations. As a result of these subsidies, sawmilling businesses which would be marginal or non-viable in their present form are able to continue operating and to continue resisting the pressures to change their inefficient methods of operation." (p31)

The Resource Assessment Commission (1992a) notes;

"Too often the natural capital of forests has been considered 'free': free supplies of air, water, soil and plants. Such gifts of nature have cost nothing, in monetary terms, to produce, and hence their value to society has not been measured adequately. In determining the most efficient use of forests, in many cases these resources have not been priced, while in other cases they have been underpriced. The inadequate valuation of many of the natural resources of forests can lead to the forests' overuse and consequent degradation."

Royalties charged for timber removed from public forests do not represent the true value of the timber (PAC 1990, Clark 1991b, Smith 1991, RAC 1992a). The Forestry Commission of NSW is significantly subsidised by not having to pay lease fees for commercial exploitation of Crown Lands, not having to pay local council rates and charges, and not paying "notional income tax" on their commercial surplus (PAC 1990).

The Forestry Commission's native forest asset valuations really only consider exploitation costs and fail to consider replacement costs, they don't have a satisfactory inventory of native forests, and don't account for the non-timber values inherent in native forests (PAC 1990). The Commission values pine plantations at \$2 256 per hectare but value native forests at only \$36 per hectare, which only reflects the costs of road construction and minimal silvicultural treatment (PAC 1990).

Because the Forestry Commission gets native forests to exploit free of charge they can charge extremely low royalties and still cover their costs (PAC 1990). The NSW Public Accounts Committee (PAC 1990) concluded that "the nonpayment of any rental on Crown Lands is a net transfer of public equity to the timber processing industry."

The Forestry Commission's provision of "unacceptable" rebates for long distance haulage have removed the incentive for industries to be situated close to the resource base and, in conjunction with underpriced raw materials, has encouraged sawmilling businesses that would otherwise be marginal or non-viable to continue operating and resisting the pressures to change their inefficient methods of operation (PAC 1990).

In addition to sawmills getting timber cheaper the further they cart it there is the increased costs to the public by way of paying for damage caused to roads which in 1990 was estimated as 4 cents per net tonne kilometre, which for transport of export woodchips alone represented a subsidy by NSW taxpayers of \$3 million in 1985-86 (PAC 1990).

The NSW Public Accounts Committee (PAC 1990) also considered that underpricing "may well be causing long-term degradation to our native forest heritage."

The Resource Assessment Commission (RAC 1992a) notes that it has been established that forestry agencies have not priced logs to the level that would be reached in a competitive market, and that in establishing log prices consideration needs to be given the costs of production they incur in terms of labour and capital spent on forestry operations and the environmental costs of harvesting.

The recent requirement for the Forestry Commission to manage their commercial activities on a commercially sound basis will hopefully result in real price increases for native forest sawlogs and pulplogs (Clark 1991b), though due to effective monopolies in many areas this may not be the result. Unlike radiata pine, native timbers face no direct competition from overseas, and the unique properties of eucalypt timber provide scope for realizing greater value than is currently obtained from each log (PAC 1990).

Increasing hardwood royalties to reflect the true costs would:

- (i) reduce the volume of timber removed from native forests and impose an economic limit on the annual timber harvest (PAC 1990, Clark 1991b);
- (ii) encourage the sawmilling industry to shift into the production of higher value products that utilize the unique characteristics of NSW eucalypt timber (PAC 1990, Clark 1991b);
- (iii) remove the competitive disadvantage that plantation developers and companies processing plantation wood currently face (Cameron and Penna 1988, PAC 1990, Smith 1991a, Clark 1991b, RAC 1992a, Shea 1992).

As in Australia low timber royalties have undermined the will to adopt sustainable management in tropical countries, as well as having "a powerful influence in depressing royalties for sawlogs in countries which participate in World trade and this extends to domestic royalties in Australia." (Shea 1992). Where domestic markets tend to be isolated from international timber trade (e.g. China and South Africa) very high royalties for locally grown high quality logs apply (Shea 1992). As the harvesting of rainforests inevitably declines over the coming decades, "With this will go the leverage of the so-called timber barons to keep prices low." (Shea 1992).

## 2.1 STATE FORESTS ECONOMICS OF LOGGING MISTAKE STATE FOREST, THE MACKSVILLE MA AND THE URUNGA MA.

It is clear that up until 1984/85 the Macksville MA was operating at a significant annual loss. In 1984/85 it was amalgamated with Bellinger and Urunga MAs for management purposes. In the seven years 1984/85 to 1990/91 the Urunga Management Area (including Macksville MA) returned an average of some \$92,571 per annum profit on its operations, before accounting for government subsidies and wages. This represents a return less than \$0.87 (range -\$3.76 to +\$3.78) for each cubic metre (gross) of timber extracted from the forests. Assuming an annual timber growth increment of 1 cu. m.

gross per hectare (Forestry Commission 1978) this represents a very poor return to the public on a public asset - in fact once all costs and subsidies and the loss of public capital are factored in it is evident that the public are allowing their forests to be degraded for a substantial loss.

The economic information indicates a declining economic performance on behalf of the Urunga (and Macksville) MA. Its profitability first jumped in 1984/85, when Macksville MA returned a profit for the first time ever, and then rapidly plummeted. The passage of the Forestry Amendment Act, which paid off the Forestry Commission's accumulated debts, the National Afforestation Program funding for plantations and gross overcutting all contributed to the MA again showing a profit in 1988/89. This dropped to a very marginal profit in 1990/91 when the National Afforestation Program funding ceased.

The economics of the State Forests' Macksville MA and Urunga MA operations do not enable them to manage State Forests as required. The State Forests are not able to replant many areas where regeneration has failed, they are unable to afford the many of the materials they require, they are unable to control weeds, they cannot afford to acceptably maintain fire trails, roads and bridges, nor can they maintain recreational facilities adequately or expand facilities.

When the present overcutting is stopped, the yields of non-quota timber further reduced (present levels are unsustainable) and the Up River forests cut out the profitability of the Macksville and Urunga Management Areas will significantly worsen. Correspondingly the long term problems, such as weed infestations, failed regeneration and serious erosion, will need increased labour and resources to control. It is evident that the State Forests will not be able to undertake the maintenance required or develop recreational facilities. The Up River forests will be abandoned to their fate and environmental degradation will continue. It is doubtful that the coastal forests will even be able to be managed economically unless there is a restructuring of management, log pricing and the industry.

TABLE 2.1 ECONOMICS OF LOGGING IN MACKSVILLE MA (DOLLARS by 1000)  
(Not converted to current values)

	REVENUE	EXPENDITURE	PROFIT/LOSS
1981/82	121.0	290.1	- 169.1
1982/83	180.2	317.7	- 137.5
1983/84	184.6	293.3	- 108.7
1984/85	412.1	325.0*	+ 87.1
1985/86	680.8	? *	?
1986/87	547.2	? *	?
1987/88	562.9	? *	?

NOTES ON TABLE 2.1

\* The 1984/85 figure is given in the annual report as an "estimate" due to expenditure records being amalgamated with Urunga, no expenditure figures for Macksville are given for 1985/86, 1986/87 and 1987/88.



Due to the paucity of data it has not been possible to ascertain the profitability of the Macksville Management Area. Table 2.1 is therefore provided for completeness and to indicate the situation with Macksville.

The 1984/85 Annual Report for Macksville states "There is no doubt this is the first year in which income has exceeded expenditure". This was attributed to significant increases in the percentages of sawlogs taken from coastal forests, large volumes of non-quota sawlogs being removed and there being an increase in royalties. It is also evident from Table 1 that the turn around in the MA's profitability in 1984/85 was enhanced by the dramatic increase in the removal of non-quota sawlogs. The further increase in 1985/86 was attributed to a temporary increase in the sale of poles.

From 1984/5 the entire Urunga Management Area, including Macksville and Bellinger MAs, has to be considered in order to obtain an indication of the economics of logging the Macksville Management Area (Table 2.2).

TABLE 2.2 ECONOMICS OF LOGGING IN THE URUNGA MANAGEMENT AREA - INCLUDING MACKSVILLE AND BELLINGER MAs.

Dollar values converted to 1991 values.

YEAR	PROFIT/LOSS \$ by 1000	VOLUME REMOVED cu. m. gross	AREA LOGGED hectares	PROFIT/LOSS	
				cu.m.	ha.
1984/85	389	102916		3.78	
1985/86	192	117449		1.63	
1986/87	-219	108969		-2.01	
1987/88	-342	91002		-3.76	
1988/89	222	102500		2.17	
1989/90	367	115492	3996	3.18	91.84
1990/91	39	103543		0.38	
TOTALS	648	741871		\$0.87	

NOTES:

The Annual Reports for 1991/92 and 1992/93 do not include economic data and so these years were not able to be incorporated.

The areas logged in each year have not been obtained, thus figures are only presented for 1989/90 - which being an unusually profitable year can not be considered to be representative.

The profitability of logging is greatly overstated as it has not been possible to account for subsidies from various programmes, staff wages and the loans provided by treasury to prop up the Forestry Commission. If these were able to be factored in it is apparent that for most, if not all, years the public would not receive any direct profit at all from logging in the Urunga MA, rather the public would be paying significant amounts to have their forests logged.

There is a significant discrepancy between profits for 1988/89 given in the 1988/89 Annual Report (Table 10 - \$235,000) and that given in the 1989/90 and 1990/91 Annual Reports (p.24 \$200,000, p.6 \$200,000

respectively) - this discrepancy is due to a failure to account for some \$35,000 in head office and "depreciation and amortization" costs, the \$200,000 figure has been utilised here (converted to 1991 values). As Table 10 is relied upon for data prior to 1988/89 these figures are of questionable accuracy and may be inflated. There are a number of other inaccuracies in Table 10.

The Management Area's financial status was enhanced around 1987/88 due to the passage of the Forestry Amendment Act which gave an additional subsidy to the Forestry Commission by relieving them of the interest payable on their accumulated debt of some \$110 million. They were supposed to pay a dividend to Treasury in return, though failed to do so in 1987/88 or 1988/89 (PAC 1990 p27). Between 1987/88 and 1990/91 the Forestry Commission borrowed a further \$49 million dollars from the NSW Treasury, and even though it claimed to have made a "real profit" for the first time in 77 years in 1991/92 there was no 'real' dividend paid to Treasury (Sydney Morning Herald 15.5.1993).

The drop in "profits" for 1990/91 was largely due to the ceasing of National Afforestation Program funding for plantations which had "boosted previous years revenues" (FC 1990/91).

It is clear that up until 1984/85 the Macksville MA was operating at a significant annual loss. In 1984/85 it was amalgamated with Bellinger and Urunga MAs for management purposes. In the seven years 1984/85 to 1990/91 the Urunga Management Area (including Macksville MA) returned an average of some \$92,571 per annum profit on its operations, before accounting for government subsidies and wages. This represents at most \$0.87 (range - \$3.76 to +\$3.78) for each cubic metre (gross) of timber extracted from the forests. For the one, unusually profitable, year (1989/90) for which figures were obtained the return per hectare harvested was \$91.84.

The economic information indicates a declining economic performance on behalf of the Urunga (and Macksville) MA. Its profitability first jumped in 1984/85, when Macksville MA returned a profit for the first time ever, and then rapidly plummeted. The passage of the Forestry Amendment Act, which paid off the Forestry Commission's accumulated debts, the National Afforestation Program funding for plantations and gross overcutting all contributed to the MA again showing a profit in 1988/89. This dropped to a very marginal profit in 1990/91 when the National Afforestation Program funding ceased.

While it was not possible to obtain a complete record of the economic performance of the Macksville MA it is evident from reading the Annual Reports that logging of the Up River forests is undertaken at a loss. The Coastal forests are more economic and revenue from them is used to subsidise the logging of the oldgrowth Up River forests. The 1987/88 Annual Report states "Up-river revenue would increase if operations ceased on Mistake S.F."

The economics of the State Forests' Macksville MA and Urunga MA operations do not enable them to manage State Forests as required. They are not able to replant the numerous areas of failed regeneration, the labour force is insufficient "to undertake required works" (FC 1990/91), they are unable to afford the materials they require (FC 1990/91), weed control cannot be undertaken (FC 1989/90), many fire access routes "cannot be maintained to an acceptable standard by the resources

available" (FC 1990/91), roads and bridges cannot be adequately maintained (FC 1989/90), maintenance of recreational facilities is inadequate and expansion of existing facilities impossible "due to lack of funding" (FC 1990/91).

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# SAVE THE MISTAKE

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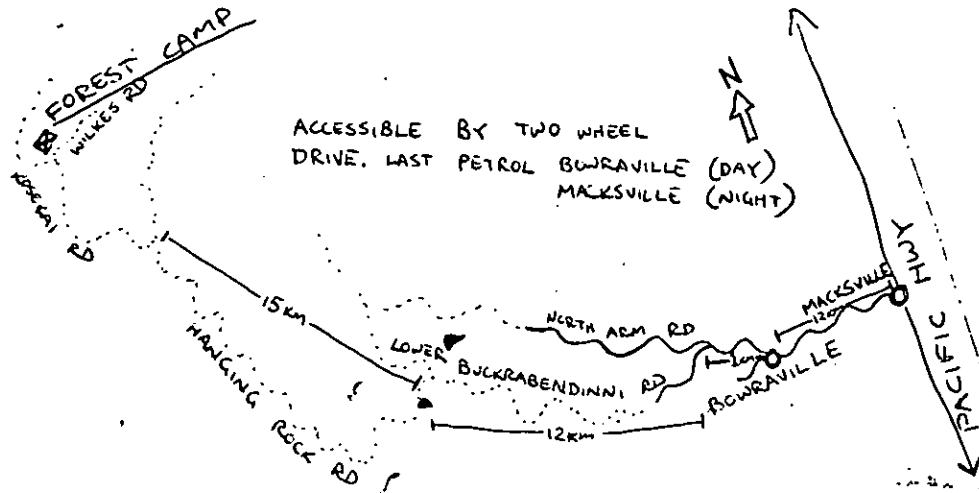
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Issue 9 August 1993

## OLD GROWTH DREAMING

While most people live trapped, dreaming of a better life, the real world which surrounds the island cities and towns of Australia is calling its friends.

The last intact forests which provide us all with our air and water are being destroyed for a disappearing dollar - not just in the Amazon or South East Asia, but all around the Third World from the Sun. Here in Australia Rainforest is still being destroyed daily, along with the last Old Growth forests which provide us and all the animals with a stable, beautiful home.

For millenia the Koori (Aboriginal) People have lived with the forests. They know the meaning of pure air and water.

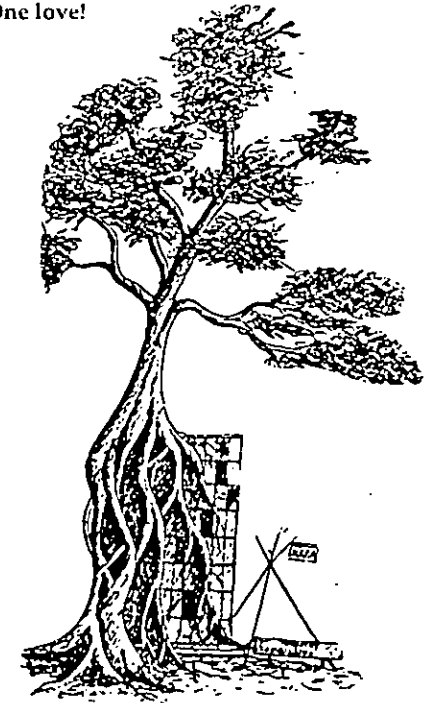
This is an invitation to any who really wish to experience the last dreaming forests with people who know the land - free of charge.

Koori Culture and the environment go hand in hand. You too can join hands with the local Kooris of the Nambucca Valley and the North East Forest Alliance (NEFA).

At this moment Trevor Ballanggang Jr of the Gumbanggerrie People, his dubay and jarjums have established a Koori Culture Camp in Mistake Forest in order that all people of the rainbow spectrum can come and enjoy some Koori tucker and philosophy and help preserve our last Old Growth forests - which are vital for the survival of the Koori Dreaming and the human race.

A message from Trevor to all the people of the rainbow spectrum - come one and all - enjoy Goori culture first hand.  
One love!

# OM GAIA



# Its A Mistake!



The Mistake Forest rides the ridges from the Great Dividing range almost to the sea, in the Nambucca Valley area which is exactly halfway between Sydney and Brisbane. It contains the last intact subtropical coastal forest in Australia and is currently being logged by the NSW Forestry Commission (F.C.).

The Mistake is home to at least 24 *endangered species of animals* and many threatened species of plants. As you read this, trees which sustain breeding colonies of koalas are being cut in the Mistake. Extremely rare animals are being killed by the F.C., which is issued a 'Licence to Kill Endangered Species' by the National Parks and Wildlife Service (NPWS).

The Mistake is a watershed which actually produces pure, fresh water and retains it through droughts. Old Growth (unlogged forest) canopy produces water - cut forest sucks it up. Old Growth forests are now known to be our *only source of pure, fresh water* - a fact known to the Koori people since their Creation.

The Mistake contains many sites of significance to the local Koori people. A Koori Embassy has been established in the Mistake Forest by representatives of the local Gumbangerri Tribe, who have inhabited the Nambucca and surrounding area since ancient times. Accredited flora and fauna surveyors are camped with them, finding more endangered plants and animals every week. Our camps are in the middle of the forest, surrounded by perfect examples of (so far) untouched Rainforest and other Old Growth of extraordinary beauty - which is some of the most diverse and complex yet studied.

This is the latest phase in a long series of activities by local residents intent on saving these last forests for all time. In 1987 Trevor Bailly, a resident of the upper reaches of South creek, west of Bowraville, became concerned about the siltation of the creek below forestry operations occurring at the time. He was able to legally force the forestry commission to prepare an environmental impact statement (EIS) before logging could proceed. The EIS was done and although deemed inadequate for many reasons by its critics, logging recommenced in the Mistake State Forest in October 1992.

## WATER CATCHMENT

The Environment Protection Authority (EPA) gives the F.C. a licence to pollute waters throughout NSW. This forest is part of the water catchment area for three towns, two coastal settlements and hundreds of farms. Several research studies show that Old Growth (100 years or more) yields more than 3 times as much water to its downstream creeks and rivers as does regrowth - and releases it slowly through dry times. In these studies Old Growth yielded 12 megalitres of water per hectare per year while regrowth (7 years after logging) used 3 megalitres per hectare per year. These studies were done in Victoria. Results from a study by the F.C. in the Karuah River catchment on the north coast of NSW indicate a similar trend - which will culminate in coastal deserts if we don't change course NOW. The long-term effects to our communities, towns, industries and cities are already likely to be disastrous. We all need water.

## EROSION

42% of this forest is over 25 degree slopes. Areas up to 35 degrees are being logged. Experts agree that logging or roading in areas over 25 degrees is a huge erosion risk. In some other forests on the North Coast, logging is already banned over 25 degrees. Professor J. Mc Garity, an eminent soil scientist who has studied Mistake SF, says logging and roading on steep lands (over 25 degrees) will lead to considerable erosion and serious initial pollution of the nearby stream system. The risk of permanent damage to the soil and aquatic environment is too great to allow the logging to proceed.

## OLD GROWTH

2,140 Ha of old growth remain in Mistake Forest. 1,800 Ha of this is planned to be logged by the Forestry Commission.

The logging of the remaining old growth will cost the Nambucca Shire at least 27 thousand megalitres in lost water yield per year. Professor H. Recher estimates there are less than 5% of NSW forests remaining as old growth. The Nambucca Shire is nearly finished the process of logging the last of its old growth. This was due to be finished in 1984. The National Forest Policy Statement, signed by Premier Fahey, is not being adhered to in the Mistake Forest. It states that Forest agencies will avoid damaging high conservation old growth forests until regional assessments are done. No Forestry Commission Environmental Impact Statements have assessed Old Growth forests.

## WILDLIFE

At least 24 endangered species - including Koalas, Yellow-bellied Gliders, Sooty Owls, Spotted-Tailed Quolls, Sphagnum Frogs, Rufous Scrub Birds, Parma Wallabies, Long-nosed Potoroos, rare bats and many more creatures have been found in the Mistake. The NPWS has stated that the Mistake State Forest EIS was inadequate, especially the surveys for endangered species and the prescriptions to protect them. The NPWS required a Fauna Impact Statement to be done. This has not yet been deemed adequate by the NPWS and is likely to be rejected - meanwhile, the FC is still logging. NPWS recommendations include:

- \* Establishing a flora reserve
- \* Doing additional specific surveys
- \* Linking Old growth Areas with wildlife corridors
- \* Retention of specific species of eucalypts (Grey Gums, Grey Ironbarks, White Mahoganies) as these have almost been wiped out on the range.
- \* Leaving all Brush Box trees which have a rainforest understory

NONE of the above recommendations have been met and logging continues under a 'temporary' LICENCE TO TAKE AND KILL ENDANGERED FAUNA which was issued STATE-WIDE with no environmental assessment by Parliament - to keep the timber industry going. The NPWS has the power to enforce its recommendations. It has so far failed to do so.

## ABORIGINAL SITES

The mistake forest is rich in Aboriginal sites - one of them being a ceremonial Bora Ring. Mountain peaks are also of significance. It is thought the Mistake area was where the "clever men" of the Gumbangerri tribe retreat for meditations, where they would be visited by the wise spirits and given advice. The EIS states that the commission will consult

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with local Aboriginal Land Councils and give them detailed maps before logging. No consultations are yet recorded on the Land Councils' books and no maps have been provided. NPWS has recommended that the F.C. survey for and map archaeological sites before logging - but this has not yet occurred. The EIS stated that full consultation with Land Councils would occur before logging the upper slopes and peaks, and that contractors would be trained in recognising sites and artefacts. This has not occurred either.

## JOBS

Jobs are not only provided by logging. They come from tourism, maintenance and construction of public facilities, the commercial recreation industry (ie. cabins, trailrides, 4wd tours ect.) These are more sustainable to the local economy in the long term.

The EIS for Mistake says work will be provided for a contracting team of 3 men for a period of five years to log the old growth remaining (to get 12,040 cubic metres per year) and then the cut will reduce to the sustainable level of 9,400 cubic metres per year.

The cost/benefit analysis of logging steep, upper catchment areas has not yet been done. Things such as reduced water yield, soil erosion, air and water quality degradation, loss of species, loss of scientific, educational, cultural and tourism resource have not been taken into account.

In 77 years of managing the public forests of NSW for the people of NSW the Forestry Commission has succeeded in going into debt for 110 million dollars. Our Old Growth forests are nearly gone and we have paid to have them carted away.

Local people have given up on the F.C. and are now conducting surveys of their own at their own expense. Their time is being used productively studying and enjoying their environment.

A detailed, independent proposal to turn the Mistake Forest into a National Park is now underway - but local District Forester Steve Rayson has said there is "no way" the F.C. will turn this land over to National Parks.

Local people have been camped in the Mistake for months, walking through and surveying these extraordinary forest bioregions. Come and experience them for yourself! The forest is very close to the coast and accessible by any two wheel drive vehicle. If you can't come yourself, please copy this and/or pass it on.

You can send donations of money, food or equipment to the Old Growth Survival Fund, c/- the Bellingen Environment Centre, PO Box 152 Bellingen, 2454. Om Gaia!

1

REVIEW OF STATE FOREST'S MANAGEMENT OF  
MISTAKE STATE FOREST.

D. Pugh, February 1993

"People do expect that their Australian Forest Services and their Australian Forest Industries, together, will conserve, in never ending benefit to them, both the Australian timberlands and their commerce.

If there be disagreement between the strategy of the one and the tactics of the other, the battle is at hazard. The community for which the war was lost may be entitled to put a disagreeable end to its disagreeing generals, at the disagreeing ends of the cross-arms of the nearest lamp post." Mr. E.H.F. Swain, Forestry Commissioner, N.S.W. 1937.

Macksville Management Area is one of those claimed to be managed on a sustained yield basis, though in practice this is not the case. An investigation of the management plan, yield assessment and annual reports reveal inflated assessments, gross overcutting and contempt for the Management Plan that is meant to be abided by.

In summary mis-calculations and mis-management have led to:

- \* gross overcutting of quota sawlogs, in the six years from July 1987 to July 1993 the average annual quota removal was 9 660 cu. m. net., representing an average annual overcut of 1 860 cu. m. net (24%), exceeding the annual limit by as much as 43% in 1987/88.
- \* actual yields being significantly below predicted yields by up to 50%.
- \* premature cutting of quota resources for the second cutting cycle (after 1995), which will lead to significant future shortfalls.
- \* failure to abide by the Macksville Management Plan's order of working and cutting limits, and
- \* failure to manage the area's forests on a sustainable yield basis, with no real attempt to manage them on an ecologically sustainable basis.

It is clear that up until 1984/85 the Macksville MA was operating at a significant annual loss. In 1984/85 it was amalgamated with Bellinger and Urunga MAs for management purposes and the profitability of the combined management areas jumped, with the Macksville MA reportedly returning a profit for the first time ever. Profitability plummeted and the MAs again suffered significant losses. The passage of the Forestry Amendment Act, which paid off the Forestry Commission's accumulated debts, federal funding and gross overcutting all contributed to the MA again showing a profit in 1988/89. This dropped to a very marginal profit in 1990/91 when the federal funding ceased.

In the seven years 1984/85, to 1990/91 the Urunga Management Area (including Macksville MA) returned an average of less than \$0.87 for each cubic metre (gross) of timber extracted from the forests. Assuming an annual timber growth increment of 1 cu. m. gross per hectare this

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represents a very poor return to the public on a public asset - in fact once all costs, direct and indirect subsidies and the loss of public capital are factored in it is evident that the public are paying a substantial subsidy to the industry for public forests to be degraded.

The economics of the State Forests' Macksville MA and Urunga MA operations do not enable them to manage State Forests as required. The State Forests are not able to replant many areas where regeneration has failed, they are unable to afford many of the materials they require, they are unable to control weeds, they cannot afford to acceptably maintain fire trails, roads and bridges, nor can they maintain recreational facilities adequately or expand facilities.

When the present overcutting is stopped, the yields of non-quota timber further reduced (present levels are unsustainable) and the Up River forests cut out the profitability of the Macksville and Urunga Management Areas will significantly worsen. Correspondingly the long term problems, such as weed infestations, failed regeneration and serious erosion, will need increased labour and resources to control. It is evident that the State Forests will not be able to undertake the maintenance required or develop recreational facilities. The Up River forests will be abandoned to their fate and environmental degradation will continue. It is doubtful that the coastal forests will even be able to be managed economically unless there is a restructuring of management, log pricing and the industry.

This preliminary report is a review of resource and economic issues as they are dealt with in State Forests' Management Plan for the Macksville Management Area and Annual Management Plan Reports for the past 13 years. This is a review of the information presented, with some interpretation of data. The aim is to provide an overview of timber resources and economic performance.

Mistake State Forest is within the Macksville Management Area, this was partly absorbed into the Urunga Management Area for management purposes in 1984/85 and completely in 1988/89. This arrangement has yet to be formalised by the abolition of the Macksville MA or the adoption of a revised Management Plan.

## 1 RESOURCES

The majority of the sawlogs being taken from north east NSW's public forests are coming from old-growth forests. In those State Forest Management Areas which have not already cut-out their old-growth forests they are committed to logging all the accessible stands that remain. Logging of these forests has traditionally been based on "maximum economic utilisation" (sometimes mis-named "selective logging") where most trees of economic value are taken, with token habitat trees retained, machinery not allowed within 20 metres of larger streams (unless authorised by the foreman) and slopes over 35 degrees left unlogged. In poorer forest types, where there is no woodchipping, a significant number of older trees may be retained but on better quality sites the forests are virtually clearfelled.

In those Management Areas where extensive tracts of old-growth forest no longer remain logging is focusing on pockets of lightly logged or unlogged forest left in areas not previously considered economical to

log. Many of these areas are in gullies or on steep slopes, thus greatly magnifying the impacts of logging (increasing erosion, stream sedimentation, and loss of old-growth dependent species relying on these pockets as refuges).

Logging is being intensified in the cut-over forests as "integrated logging" begins to dominate. In previously logged forests this involves scavenging better trees left behind in previous operations for sawlogs and taking most of the rest, along with regrowth thinnings, for woodchipping. Old-growth forests are also increasingly being subjected to integrated logging.

More recently, concerted pressure from the conservation groups in the Nambucca area has forced the National Parks and Wildlife Service to take their responsibilities more seriously and through this forced State Forests to retain more fauna habitat components. Similar pressure on the Environment Protection Authority and the Department of Conservation and Land Management (arising out of the exposure of extensive erosion and pollution of the Bellinger River due to breaches of inadequate logging prescriptions in Oakes State Forest) has also led to an improvement in soil conservation measures. Unfortunately these have still not gone far enough and there is still a need for the implementation of further conservation measures and more importantly the reservation of areas required for the "comprehensive, adequate and representative" reserve system demanded by the National Forest Policy Statement.

#### 1.1 OLDGROWTH FOREST LOGGING

The Resource Assessment Commission (1992a) estimates that in Australia 11% of hardwood sawlogs and 23% of hardwood pulpwood removed from native forests come from old-growth forests; with some 48% of New South Wales' hardwood sawlogs coming from old-growth forests.

The Resource Assessment Commission (1992a) found old-growth forests were important to industry for three reasons:

- (i) they represent a significant part of forests available for conversion to production forest;
- (ii) the old-growth resource is cheaper because it has neither the establishment costs of plantations nor the management costs of regrowth; and,
- (iii) many sawmills are designed to handle old-growth timber.

The cessation of old-growth forest logging on a national basis was estimated by RAC (1992a) to result in a reduction of overall hardwood sawlog availability from 5 million cubic metres per year to 4 million cubic metres per year (or 3 million cubic metres per year if "mature" forest is included), whereas "business as usual" was expected to result in a reduction to the same level of cut by the year 2040. Over this 40 year period timber industry employment is predicted to decline by 16% under the "business as usual" scenario and by 17% with no more logging of mature and old-growth forests.

In many areas logs from regrowth forest have been a major component of milling operations for many years and in other areas the transition from

old-growth forest to regrowth forests has been achieved without great difficulty (RAC 1992a).

It is estimated that only 6% to 10% of hardwood sawlog production is currently used for appearance grade timber (RAC 1992a). As noted by Smith (1991a) "harvest of the limited remaining, ecologically valuable ... areas of oldgrowth forest is continuing in order to maintain supply of low value, scantling (housing frame) and pulpwood products. This approach not only ignores market opportunities, but appears particularly short sighted in view of the forecast glut of softwood which is expected to collapse the already failing hardwood scantling market within the next 15 years."

#### 1.2 SUSTAINING YIELDS

One of the prime motivations for the creation of the Forestry Commission expressed in the 1907 Royal Commission of Inquiry on Forestry was the dwindling timber resources and the need to sustain them into the future (PAC 1990). In 1980 the former Commissioner for Forests, Dr. S.W. Gentle noted that there were many management areas not being logged on a sustained yield basis and emphasised the need to bring operations onto sustained yield (PAC 1990).

Before the present restructuring there were 56 native forest management areas in NSW, of which the Forestry Commission estimated 44 are being managed on a sustained yield basis, with the remaining 12 expected to be brought onto a sustained yield basis during the 1990's (RAC 1992b). The current annual quota commitments of native sawlogs to the timber industry of 689 000 cubic metres net is expected to be reduced by 84 000 cubic metres this decade as part of this strategy (RAC 1992b). As is evidenced by the discussion below even MAs that are claimed to be on sustained yield aren't due to the inadequacies of resource assessments.

The Forestry Commission's concept of sustained yield is to maintain the same volumes of timber in perpetuity but not the same sized or quality timber (PAC 1990). In most north east NSW Forestry Commission Management Areas this strategy has, or will, result in the old-growth forests being cut out and then sawlog quotas being virtually eliminated for some years or decades, or drastically reduced to a level they guess will be sustainable.

The Forestry Commission use rough estimates of standing resources, and limited growth plot measurements to estimate future timber availability from state forests. Models that are used to determine future sustainable yields are suitable for single species and single aged plantations but unsuitable for native forests (PAC 1990, RAC 1992a), where estimations of future wood availability have been noted by CSIRO to vary by as much as 50% (RAC 1992a).

The NSW Public Accounts Committee (PAC 1990) notes:

"In the long-term, sustainable harvesting is in the industry's best interest, but in the short-term many mills would prefer to process tomorrow's timber today, gaining tomorrow's profit today, then relocate once the resource is too degraded to be useful. Under these circumstances, it would be naive not to recognize that short-term



economics is in direct conflict with regulation and the principle of sustained yield."

Sustained yield is an economic rather than an ecological principal, and thus does not ensure that the nature, character, or species composition of a forest is maintained (PAC 1990). To ensure proper account is taken of environmental values we need ecologically sustainable logging.

The overcommitment of timber resources precludes the introduction of ecologically sustainable management practices (e.g. Smith 1991a). Smith (1991a) recommends limiting guaranteed allocations of timber to industry to a maximum of 50% of the long-term sustainable yield for a supply region so as to allow for unforeseen circumstances and improved management practices.

As has been proven in court a number of times over recent years, and was graphically illustrated by CaLM's (Atkinson et. al. 1992) report on Oakes State Forest, the Forestry Commission's logging prescriptions are inadequate and inadequately complied with. They do not ensure that the environmental values of forests (water, soils, flora and fauna) are sustained and not significantly degraded. The Resource Assessment Commission (1992a) recommends independent audits of the adequacy of forest codes of practices and their enforcement. The adoption of adequate logging prescriptions will have a significant effect on volumes of timber obtainable from forests.

### 1.3 TIMBER RESOURCES OF THE MACKSVILLE MANAGEMENT AREA AND MISTAKE STATE FOREST.

Macksville Management Area is one of those claimed to be managed on a sustained yield basis, though in practice this is not the case. Like most other Management Areas claimed to be on sustained yield an investigation of the management plan, yield assessment and annual reports reveal inflated assessments, gross overcutting and contempt for the Management Plan that is meant to be abided by.

In summary mis-calculations and mis-management have led to:

- \* gross overcutting of quota sawlogs, in the six years from July 1987 to July 1993 the average annual quota removal was 9 660 cu. m. net, representing an average annual overcut of 1 860 cu. m. net (24%), exceeding the annual limit by as much as 43% in 1987/88.

- \* actual yields being significantly below predicted yields by up to 50%.

- \* premature cutting of quota resources for the second cutting cycle (after 1995), which will lead to significant future shortfalls,

- \* failure to abide by the Macksville Management Plan's order of working and cutting limits; and

- \* failure to manage the area's forests on a sustainable basis.

Based on 'Hardwood Assessment - Macksville M.A. Coastal Working Circle' (Forestry Commission 1979) the Forestry Commission (1978, as amended to 1987) estimated the yields available from the Macksville MA as from 1982,

though noted that the "derived volumes have limited accuracy". It was estimated that there was a total of 171 780 cu. m. gross of sawlogs over 40 cm. diameter (dbh) available after 1982 from the Coastal Working Circle for the first cutting cycle (giving a net annual yield of 7 730 cu. m.) and a total of 71 100 cu. m. gross (34 000 cu. m. net) of merchantable quota sawlogs in the 'Up River Forests', anticipated to be utilized by 1982.

Mistake State Forest was arbitrarily divided into the Up River and Coastal Working Circles. Mistake SF was estimated to contain 24 800 cu. m. gross (12 000 cu. m. net) of the sawlog volumes in the 'Up River Forests'. It was assessed as containing 51,943 cu. m. gross of the sawlogs available from the Coastal WC for the first cutting cycle (CC1) which was to last until 1995. Timber available from the Coastal WC for the first cutting cycle was to come from 'Stand Condition Types' A and B, with type C reported as:

"Suitable for sawlog production but stands immature for quota sawlog harvesting - quota sawlogs not available for practicable economic harvesting until second cutting cycle (beyond 1995)." (FC 1979)

The quotas for sawlogs in the Macksville MA were set as 1978/79-1979/80 26 880 cu. m. net, 1980/81-1981/82 8 000 cu. m. net (FC 1978 p2, p24) and as from 1982/83 "The annual yield shall not exceed the total of annual quota commitments" of 7 800 cu. m. net (FC 1978, as amended 1982, p24).

The Forestry Commission (1978) note:

"The up river forests mainly consist of logged areas carrying 0-20 year old regeneration as a result of logging, with a few virgin stands. These forests are very deficient in intermediate size classes. It is estimated that available merchantable logs will be harvested by about 1986 some 40 years before any existing regeneration can produce sawlogs." (pp17-8)

"Timber production objectives shall be met by concentrating harvesting in the economically accessible hardwood resource of the virgin up river forests. On completion of harvesting of this resource, logging will be confined to the coastal forests." (p.22)

"The option of timber production from the up river forests after the current cutting cycle will not be actively pursued in the foreseeable future. Expenditure associated with road construction, maintenance, protection and silvicultural treatment will be kept to a minimum." (p23)

The combination of wet weather, Allen Taylors not being satisfied with the species available (eg. FC 1982/83) and the Forestry Commission's financial losses led to an abandonment of the Management Plan's intent to log out the Up River forests before concentrating on the Coastal Working Circle.

The Forestry Commission's intention not to manage the Up River forests on a sustained yield basis is still current, their only concern being to maximise what they can cut in order to "try and find sufficient quota to maintain the 7 800 m3 sustained yield cut longer than the end of CC1" (FC 1988/89)

The Forestry Commission's Annual Reports make a number of comments on the yield assessments: "It should be noted that segregation into the strata used in the assessment is virtually impossible to achieve" (FC 1981/82), "It would appear from data presented that there is a broadening gap between actual and predicted yields for the total coastal working circle. ... it would appear that for Mistake S.F. at least, the stand condition typing on which the assessment is based is proving unreliable." (FC 1985/86), "The major problem remains the gaps between actual and predicted yields on Ingalba and Mistake S.F.s. ... Assessment was done using random plots and it could be they did not sample enough of the poorer country. This coupled with the forest being cut over at so many different periods could produce the wrong information." (FC 1986/87), "... the whole question of sustained yield after [unlogged areas are] exhausted needs to be tackled as a separate issue, probably involving measurement of a better defined resource.", "The question of what actually should constitute the CC1, CC2 and CC3 sustainable area needs to be resolved, sooner rather than later due to the poor results being achieved compared to that assessed." (FC 1987/88)

TABLE 1. HARDWOOD (NON-RAINFOREST) REMOVALS FROM MACKSVILLE MANAGEMENT AREA. Source: respective Forestry Commission Annual Reports.

YEAR	QUOTA CUT m3 net	QUOTA CUT m3 gross	NON-QUOTA SAWLOGS m3 gross	OTHER
1981/82	8 600	10 581	6 668	1 724
1982/83	7 606	10 650	450	5 474
1983/84	3 678	4 787+	9 190	3 457
1984/85	8 448	11 827+	19 825	4 749
1985/86	8 934	12 507+	23 084	7 905
1986/87	7 640	10 696+	24 573	5 250
1987/88	11 167	14 447	16 705	7 072
1988/89	9 540	12 059	20 492	5 262
1989/90	9 433	13 020	24 871	5 590
1990/91	10 588	15 323	21 548	5 231
1991/92	8 624	12 615	15 560	5 103
1992/93	8 610	12 085	10 948	6 306

+ These volumes estimated by applying a multiplier of net to gross of 1.4: The average conversion factor of gross to net used in Annual Reports over the period 1987/88 to 1990/91 was 0.744 (range 0.691-0.791).

As from 1988/89 the Macksville MA was subsumed by the Urunga MA for management purposes. The Urunga MA Annual Reports continued to emphasise the inadequacy of the resource assessments in the Macksville MA: "A proper assessment of all the resource is required", "... yields being obtained on Coastal areas are of great cause for concern." "... CC2 (27 years) cut needs to yield over twice the CC1 cut to achieve predicted yields. Whether this will occur is completely unknown as no follow up assessment of stand structure remaining, as required by CUTAN monitoring, has ever been done." (FC 1988/89), "... a complete assessment of the districts timber resources is urgently required and is a priority." (FC 1990/91), "Reassessment of the resources is required and supported... It is expected that this work will be undertaken during 1994" (FC 1991/92).

Since 1982 the actual yields from the Coastal Working Circle have been slightly below the assessed yields (FC 1979) for Nambucca and Way Way State Forests, almost half the assessed yields for Ingalba State Forest and significantly higher for Mistake State Forest (FC 1989/90). While this would appear to give an overall favourable result this disguises the fact that it has involved the premature harvesting of trees meant to be retained for the second cutting cycle (CC2, after 1995). The Forestry Commission (1989/90) note that the 1979 Yield Assessment assumed that only Strata A and B would be cut in CC1, whereas Strata C has also been harvested (see above).

The practice has been to log the most productive stands first (FC 1988/89, p11) indicating that the deficiency in actual yields will worsen into the future.

TABLE 1.2 SAWLOG QUOTA (NON-RAINFOREST) REMOVALS FROM MACKSVILLE MANAGEMENT AREA. Source: respective Forestry Commission Annual Reports. All figures in cubic metres net.

YEAR	ALLOWABLE QUOTA CUT	ACTUAL QUOTA CUT	DIFFERENCE	% OVER CUT
1981/82	8 000	8 600	+ 600	8%
1982/83	7 800	7 606	- 194	-
1983/84	7 800	3 678	-4 122	-
1984/85	7 800	8 448	+ 648	8%
1985/86	7 800	8 934	+1 134	15%
1986/87	7 800	7 640	- 160	-
1987/88	7 800	11 167	+3 367	43%
1988/89	7 800	9 540	+1 740	22%
1989/90	7 800	9 433	+1 633	21%
1990/91	7 800	10 588	+2 788	36%
1991/92	7 800	8 624	+ 824	11%
1992/93	7 800	8 610	+ 810	10%
TOTALS	93 800	102 868	+9 068	
TOTAL OF OVERCUTS			13 544	

It is evident from Table 1.2 that the State Forests have been grossly overcutting in the Macksville Management Area in breach of the cutting limits specified in the Management Plan. In the 12 years from July 1981 to July 1993 the cut of quota sawlogs allowable under the Management Plan were exceeded in 9 years, by up to 43%. Most alarming is that in the six most recent years (for which figures are available) from July 1987 to July 1993 the average annual quota removal was 9 660 cu. m. net, representing an average annual overcut of 1 860 cu. m. net (24%), exceeding the annual limit by as much as 43% in 1987/88. The significant overcutting in the last six years should be of considerable concern as it represents a total overcut of 11 162 cu. m. net, or almost one and a half years worth of quota.

When this overcut is considered in conjunction with the fact that anticipated yields per hectare have only been maintained by taking timber meant to be retained for the next cutting cycle and logging the most

productive stands first it indicates significant yield problems for the Macksville MA in the near future.

While no assessment of the future availability of non-quota sawlogs and durable poles is available it is apparent that these resources too are not being managed on a sustainable basis and their availability is expected to rapidly decline in the near future.

When Trevor Bailey obtained an injunction in 1987 to stop logging in some Up River compartments in Mistake State Forest the Forestry Commission "maximised" their cutting rate in the Coastal WC part of Mistake SF (FC 1988/89), until the court judgement on March 31st 1989 caused them to suspend logging operations in Mistake State Forest until an EIS was prepared.

TABLE 1.3 The Forestry Commission's (1988/89) "best current estimate of remaining identified resource" in Mistake State Forest was given as:

	GROSS AREA	NET Quota/Ha.	TOTAL
Mistake (southern)	340	14.3	4850
Mistake (northern)	916	4.4	4050
TOTALS	1256	7.1	8900

Despite all the identified failings of the resource assessments in the Urunga Management Area (including the Macksville MA) the State Forests commission is pressing ahead with its revised (long overdue) Management Plan and the Urunga-Coffs Harbour Environmental Impact Statement without undertaking a reliable yield assessment. The undated document prepared by State Forests for the EIS consultants states:

"Only the coastal forests have been assessed for quota sawlog yield. The plantation resource has been the subject of a yield scheduling exercise using data collected from previous growth and inventory work and past yields. All other areas have had estimates of various products availability made where sufficient information from past yields allows such estimation to be reasonably accurate."

The State Forests seem intent to cover up their gross overcutting and the identified resource shortfalls in the coastal forests, and ignore the premature cutting of resources identified for the next cutting cycle and that their yield assessments for the Up River forests are unreliable. Their intention is not to undertake a valid yield assessment until some time in the future, in the mean time they intend to continue unsustainable logging of quota sawlogs from the Urunga MA at the prescribed rate of 25,520 cu. m. per annum.

## 2.0 STATE FORESTS ECONOMICS

As noted by the Public Accounts Committee (1990):

"... native forest asset valuations really only consider replacement costs, a satisfactory inventory of native forests is lacking, there is no accounting for the non-timber values inherent in the native forest, ... and numerous subsidies enjoyed by the Commission ... are not quantified in the accounts." (p21)

"The State's timber processing industry is heavily subsidised by the public sector. Chief among the subsidies are under priced raw materials (in the case of Eucalypt logs), and failure to bear the full costs of road construction and maintenance which are attributable to the industry's operations. As a result of these subsidies, sawmilling businesses which would be marginal or non-viable in their present form are able to continue operating and to continue resisting the pressures to change their inefficient methods of operation." (p31)

The Resource Assessment Commission (1992a) notes;

"Too often the natural capital of forests has been considered 'free': free supplies of air, water, soil and plants. Such gifts of nature have cost nothing, in monetary terms, to produce, and hence their value to society has not been measured adequately. In determining the most efficient use of forests, in many cases these resources have not been priced, while in other cases they have been underpriced. The inadequate valuation of many of the natural resources of forests can lead to the forests' overuse and consequent degradation."

Royalties charged for timber removed from public forests do not represent the true value of the timber (PAC 1990, Clark 1991b, Smith 1991, RAC 1992a). The Forestry Commission of NSW is significantly subsidised by not having to pay lease fees for commercial exploitation of Crown Lands, not having to pay local council rates and charges, and not paying "notional income tax" on their commercial surplus (PAC 1990).

The Forestry Commission's native forest asset valuations really only consider exploitation costs and fail to consider replacement costs, they don't have a satisfactory inventory of native forests, and don't account for the non-timber values inherent in native forests (PAC 1990). The Commission values pine plantations at \$2 256 per hectare but value native forests at only \$36 per hectare, which only reflects the costs of road construction and minimal silvicultural treatment (PAC 1990).

Because the Forestry Commission gets native forests to exploit free of charge they can charge extremely low royalties and still cover their costs (PAC 1990). The NSW Public Accounts Committee (PAC 1990) concluded that "the nonpayment of any rental on Crown Lands is a net transfer of public equity to the timber processing industry."

The Forestry Commission's provision of "unacceptable" rebates for long distance haulage have removed the incentive for industries to be situated close to the resource base and, in conjunction with underpriced raw materials, has encouraged sawmilling businesses that would otherwise be marginal or non-viable to continue operating and resisting the pressures to change their inefficient methods of operation (PAC 1990).

In addition to sawmills getting timber cheaper the further they cart it there is the increased costs to the public by way of paying for damage caused to roads which in 1990 was estimated as 4 cents per net tonne kilometre, which for transport of export woodchips alone represented a subsidy by NSW taxpayers of \$3 million in 1985-86 (PAC 1990).

The NSW Public Accounts Committee (PAC 1990) also considered that underpricing "may well be causing long-term degradation to our native forest heritage."

The Resource Assessment Commission (RAC 1992a) notes that it has been established that forestry agencies have not priced logs to the level that would be reached in a competitive market, and that in establishing log prices consideration needs to be given the costs of production they incur in terms of labour and capital spent on forestry operations and the environmental costs of harvesting.

The recent requirement for the Forestry Commission to manage their commercial activities on a commercially sound basis will hopefully result in real price increases for native forest sawlogs and pulplogs (Clark 1991b), though due to effective monopolies in many areas this may not be the result. Unlike radiata pine, native timbers face no direct competition from overseas, and the unique properties of eucalypt timber provide scope for realizing greater value than is currently obtained from each log (PAC 1990).

Increasing hardwood royalties to reflect the true costs would:

- (i) reduce the volume of timber removed from native forests and impose an economic limit on the annual timber harvest (PAC 1990, Clark 1991b);
- (ii) encourage the sawmilling industry to shift into the production of higher value products that utilize the unique characteristics of NSW eucalypt timber (PAC 1990, Clark 1991b);
- (iii) remove the competitive disadvantage that plantation developers and companies processing plantation wood currently face (Cameron and Penha 1988, PAC 1990, Smith 1991a, Clark 1991b, RAC 1992a, Shea 1992).

As in Australia low timber royalties have undermined the will to adopt sustainable management in tropical countries, as well as having "a powerful influence in depressing royalties for sawlogs in countries which participate in World trade and this extends to domestic royalties in Australia." (Shea 1992). Where domestic markets tend to be isolated from international timber trade (e.g. China and South Africa) very high royalties for locally grown high quality logs apply (Shea 1992). As the harvesting of rainforests inevitably declines over the coming decades, "With this will go the leverage of the so-called timber barons to keep prices low." (Shea 1992).

## 2.1 STATE FORESTS ECONOMICS OF LOGGING MISTAKE STATE FOREST, THE MACKSVILLE MA AND THE URUNGA MA.

It is clear that up until 1984/85 the Macksville MA was operating at a significant annual loss. In 1984/85 it was amalgamated with Bellinger and Urunga MAs for management purposes. In the seven years 1984/85 to 1990/91 the Urunga Management Area (including Macksville MA) returned an average of some \$92,571 per annum profit on its operations, before accounting for government subsidies and wages. This represents a return less than \$0.87 (range -\$3.76 to +\$3.78) for each cubic metre (gross) of timber extracted from the forests. Assuming an annual timber growth increment of 1 cu. m.

gross per hectare (Forestry Commission 1978) this represents a very poor return to the public on a public asset - in fact once all costs and subsidies and the loss of public capital are factored in it is evident that the public are allowing their forests to be degraded for a substantial loss.

The economic information indicates a declining economic performance on behalf of the Urunga (and Macksville) MA. Its profitability first jumped in 1984/85, when Macksville MA returned a profit for the first time ever, and then rapidly plummeted. The passage of the Forestry Amendment Act, which paid off the Forestry Commission's accumulated debts, the National Afforestation Program funding for plantations and gross overcutting all contributed to the MA again showing a profit in 1988/89. This dropped to a very marginal profit in 1990/91 when the National Afforestation Program funding ceased.

The economics of the State Forests' Macksville MA and Urunga MA operations do not enable them to manage State Forests as required. The State Forests are not able to replant many areas where regeneration has failed, they are unable to afford the many of the materials they require, they are unable to control weeds, they cannot afford to acceptably maintain fire trails, roads and bridges, nor can they maintain recreational facilities adequately or expand facilities.

When the present overcutting is stopped, the yields of non-quota timber further reduced (present levels are unsustainable) and the Up River forests cut out the profitability of the Macksville and Urunga Management Areas will significantly worsen. Correspondingly the long term problems, such as weed infestations, failed regeneration and serious erosion, will need increased labour and resources to control. It is evident that the State Forests will not be able to undertake the maintenance required or develop recreational facilities. The Up River forests will be abandoned to their fate and environmental degradation will continue. It is doubtful that the coastal forests will even be able to be managed economically unless there is a restructuring of management, log pricing and the industry.

TABLE 2.1 ECONOMICS OF LOGGING IN MACKSVILLE MA (DOLLARS by 1000)  
(Not converted to current values)

	REVENUE	EXPENDITURE	PROFIT/LOSS
1981/82	121.0	290.1	- 169.1
1982/83	180.2	317.7	- 137.5
1983/84	184.6	293.3	- 108.7
1984/85	412.1	325.0*	+ 87.1
1985/86	680.8	? *	?
1986/87	547.2	? *	?
1987/88	562.9	? *	?

### NOTES ON TABLE 2.1

- \* The 1984/85 figure is given in the annual report as an "estimate" due to expenditure records being amalgamated with Urunga, no expenditure figures for Macksville are given for 1985/86, 1986/87 and 1987/88.

Due to the paucity of data it has not been possible to ascertain the profitability of the Macksville Management Area. Table 2.1 is therefore provided for completeness and to indicate the situation with Macksville.

The 1984/85 Annual Report for Macksville states "There is no doubt this is the first year in which income has exceeded expenditure". This was attributed to significant increases in the percentages of sawlogs taken from coastal forests, large volumes of non-quota sawlogs being removed and there being an increase in royalties. It is also evident from Table 1 that the turn around in the MA's profitability in 1984/85 was enhanced by the dramatic increase in the removal of non-quota sawlogs. The further increase in 1985/86 was attributed to a temporary increase in the sale of poles.

From 1984/5 the entire Urunga Management Area, including Macksville and Bellinger MAs, has to be considered in order to obtain an indication of the economics of logging the Macksville Management Area (Table 2.2).

TABLE 2.2. ECONOMICS OF LOGGING IN THE URUNGA MANAGEMENT AREA - INCLUDING MACKSVILLE AND BELLINGER MAS.

Dollar values converted to 1991 values.

YEAR	PROFIT/LOSS \$ by 1000	VOLUME REMOVED cu. m. gross	AREA LOGGED hectares	PROFIT/LOSS	
				cu.m.	ha.
1984/85	389	102916		3.78	
1985/86	192	117449		1.63	
1986/87	-219	108969		-2.01	
1987/88	-342	91002		-3.76	
1988/89	222	102500		2.17	
1989/90	367	115492	3996	3.18	91.84
1990/91	39	103543		0.38	
TOTALS	648	741871		\$0.87	

NOTES:

The Annual Reports for 1991/92 and 1992/93 do not include economic data and so these years were not able to be incorporated.

The areas logged in each year have not been obtained, thus figures are only presented for 1989/90 - which being an unusually profitable year can not be considered to be representative.

The profitability of logging is greatly overstated as it has not been possible to account for subsidies from various programmes, staff wages and the loans provided by treasury to prop up the Forestry Commission. If these were able to be factored in it is apparent that for most, if not all, years the public would not receive any direct profit at all from logging in the Urunga MA, rather the public would be paying significant amounts to have their forests logged.

There is a significant discrepancy between profits for 1988/89 given in the 1988/89 Annual Report (Table 10 - \$235,000) and that given in the 1989/90 and 1990/91 Annual Reports (p.24 \$200,000, p.6 \$200,000

respectively) - this discrepancy is due to a failure to account for some \$35,000 in head office and "depreciation and amortization" costs, the \$200,000 figure has been utilised here (converted to 1991 values). As Table 10 is relied upon for data prior to 1988/89 these figures are of questionable accuracy and may be inflated. There are a number of other inaccuracies in Table 10.

The Management Area's financial status was enhanced around 1987/88 due to the passage of the Forestry Amendment Act which gave an additional subsidy to the Forestry Commission by relieving them of the interest payable on their accumulated debt of some \$110 million. They were supposed to pay a dividend to Treasury in return, though failed to do so in 1987/88 or 1988/89. (PAC 1990 p27). Between 1987/88 and 1990/91 the Forestry Commission borrowed a further \$49 million dollars from the NSW Treasury, and even though it claimed to have made a "real profit" for the first time in 77 years in 1991/92 there was no 'real' dividend paid to Treasury (Sydney Morning Herald 15.5.1993).

The drop in "profits" for 1990/91 was largely due to the ceasing of National Afforestation Program funding for plantations which had "boosted previous years revenues" (FC 1990/91).

It is clear that up until 1984/85 the Macksville MA was operating at a significant annual loss. In 1984/85 it was amalgamated with Bellinger and Urunga MAs for management purposes. In the seven years 1984/85 to 1990/91 the Urunga Management Area (including Macksville MA) returned an average of some \$92,571 per annum profit on its operations, before accounting for government subsidies and wages. This represents at most \$0.87 (range - \$3.76 to +\$3.78) for each cubic metre (gross) of timber extracted from the forests. For the one, unusually profitable, year (1989/90) for which figures were obtained the return per hectare harvested was \$91.84.

The economic information indicates a declining economic performance on behalf of the Urunga (and Macksville) MA. Its profitability first jumped in 1984/85, when Mackville MA returned a profit for the first time ever, and then rapidly plummeted. The passage of the Forestry Amendment Act, which paid off the Forestry Commission's accumulated debts, the National Afforestation Program funding for plantations and gross overcutting all contributed to the MA again showing a profit in 1988/89. This dropped to a very marginal profit in 1990/91 when the National Afforestation Program funding ceased.

While it was not possible to obtain a complete record of the economic performance of the Macksville MA it is evident from reading the Annual Reports that logging of the Up River forests is undertaken at a loss. The Coastal forests are more economic and revenue from them is used to subsidise the logging of the oldgrowth Up River forests. The 1987/88 Annual Report states "Up-river revenue would increase if operations ceased on Mistake S.F."

The economics of the State Forests' Macksville MA and Urunga MA operations do not enable them to manage State Forests as required. They are not able to replant the numerous areas of failed regeneration, the labour force is insufficient "to undertake required works" (FC 1990/91), they are unable to afford the materials they require (FC 1990/91), weed control cannot be undertaken (FC 1989/90), many fire access routes "cannot be maintained to an acceptable standard by the resources

available" (FC 1990/91), roads and bridges cannot be adequately maintained (FC 1989/90), maintenance of recreational facilities is inadequate and expansion of existing facilities impossible "due to lack of funding" (FC 1990/91).

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EarthSpan



Occasional Consultancy Report No.1

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**The Dungir Conservation Proposal:  
An Outline of Research Findings.**

*Robert J. DeVries & Angela C. McCauley*

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'Occasional Consultancy Report No.1'

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**The Dungir Conservation Proposal:  
A Outline of Research Findings.**

*Bosistoa floydii*

***Robert J. DeVries & Angela C. McCauley***

Occasional Consultancy Report No.1

October, 1993



- a) The Dungir Conservation Area is an area of special scientific interest containing vulnerable and rare wildlife, rare or threatened plants, the site of an historic event and places of special significance to Aboriginal culture that should be protected in a cooperative system of land tenure between the National Parks and Wildlife Service and the traditional owners under sections 8(1)(c), 8(1)(d) and 8(2)(b) of National Parks and Wildlife Act.
- b) The Gumbaynggir hold native title to unoccupied Crown Land within their tribal territory, including Mistake State Forest;
- c) This area contains part of the valued heritage of the Gumbaynggir which will be degraded by logging;
- d) The Dungir Conservation Area encompasses a major part of the Nambucca River catchment and is therefore vital for maintaining the downstream water quality and overall hydrological condition of the Nambucca River;
- e) Soil loss due to forestry operations (especially when undertaken on slopes above 18°) in an area classified as having 'high' to 'extreme' erosion hazard will lead to major water pollution and changes to the ecology and hydrology of affected streams;
- f) Landslip hazard will be greatly accentuated by vegetation removal in this geophysically unstable landscape;
- g) Biodiversity within the Dungir Conservation Area is extremely high due to its location within the Macleay-MacPherson overlap, the altitude and aspect range, the presence of valuable old growth forest habitat for forest-dependant fauna and the range of vegetation communities present;
- h) The Dungir Conservation Area also includes a key segment of the Clement Hodgkinson Historic Trail.

Each of these points will be discussed in detail in the forthcoming Dungir Conservation Proposal to be released in November, 1993.

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# The Dungir Conservation Proposal

1 THE PROPOSAL. At the present time 'EarthSpan' is in the process of finalising 'The Dungir Conservation Proposal'. This report will include detailed information on the geography, vegetation, wildlife and cultural heritage of a mountainous section of the Nambucca River catchment, between Taylors Arm and Buckra Bendinni Creek and including the catchments of South Creek. This report also considers the likely impact of logging on this environment. The proposal will recommend dedication of 'The Dungir Conservation Area' as an area of special scientific interest containing vulnerable and rare wildlife, rare or threatened plants, the site of an historic event and places of special significance to Aboriginal culture in a cooperative system of land tenure under sections 8(1)(c), 8(1)(d) and 8(2)(b) of the National Parks and Wildlife Act. Dedication is necessary to protect the significant biological, cultural and catchment protection values of the area. The precise boundary of the Dungir Conservation Area may be conveniently described with reference to the existing boundary of Mistake State Forest, which roughly circumscribes the catchment divide. The combined Nature Reserve, Aboriginal Place and Historic Site so created will cover approximately 9,600 ha of low to mid altitude forested country which currently acts as a vital (but vulnerable) component of the hydrological system of the Nambucca Valley. Preservation of this water catchment area will also facilitate the conservation of many threatened plants and animals along with places that are sacred to the traditional owners of this land, the Gumbaynggir.

2 GEOGRAPHY AND LANDSLIP HAZARD. To summarise our results so far, discussion should begin with a regional perspective. Because of its location in north-eastern NSW, occupying the eastern low to mid elevation slopes of the Great Escarpment, the Dungir Conservation Area is rugged, with the great majority of the area above 18° (33%) slope. The area experiences high and intense orographic rainfall and high rainfall erosivity, which partly accounts for the very high drainage density. The geology is the unstable, faulted and steeply dipping Five-Day Phyllite which is part of the Nambucca Slate Belt. The soils are red, brown and yellow podzolics with a resistant surface layer but with a potentially dispersible subsurface. Such a landscape was classed as a serious landslip hazard in the Nambucca Shire Environmental Study which recommended that vegetation removal above 18° (33%) should be avoided.

Schedule 12 species are: Dasyurus maculatus (Tiger Quoll); Macropus parma (Parma Wallaby); Thylogale stigmatica (Red-legged Pademelon); Petaurus australis (Yellow-bellied Glider); Phascogale cinereus (Koala); Miniopterus schreibersii (Common Bent-wing Bat); Phoniscus papuensis (Golden-tipped Bat); Calyptorhynchus lathamii (Glossy Black-Cockatoo); Ptilinopus magnificus (Wompoo Fruit Dove); Tyto tenebriosa (Sooty Owl); and Philoria sphagnicolus (Sphagnum Frog). The probable schedule 12 species are: Phascogale tapoatafa (Brush-tailed Phascogale) and Atrichornis rufescens (Rufous Scrub-bird). Additional Schedule 12 species may well be identified given comprehensive, systematic surveys.

10 TRADITIONAL LANDS AND NATIVE TITLE. Following the 1992 High Court decision in the case of *Mabo and others v. The State of Queensland*, Mistake State Forest reverted to traditional ownership by the Gumbaynggir who hold native title to this land under the Australian common law and under traditional law. This area is important to the Gumbaynggir and Aboriginal people as it contains bush foods, medicines, sacred sites and spirits of the dreamtime. Forestry operations in this area have previously led to the destruction of at least one Aboriginal site and soil erosion may destroy others. Obviously, forestry operations that are undertaken without the full and proper approval of the local Aboriginal people would represent a failure to acknowledge the rights of traditional owners who wish to see their special places preserved and their land managed properly for the benefit of the Aboriginal people and all Australians.

11 THE CLEMENT HODGKINSON HISTORIC TRAIL. In 1841, the explorer and surveyor Clement Hodgkinson travelled through the Nambucca and Bellingen districts and, after returning to England, published 'Australia, from Port Macquarie to Moreton Bay' in which he describes his travels in rich detail. Part of Hodgkinson's historic route passes through the Dungir Conservation area to its highest peak, Bowra Sugarloaf. "...ascending a long thickly-wooded slope, which led us to the summit of a high range...we had a beautiful view from the summit we were now upon. To the westward, amidst a confused mass of mountains rising beyond mountains, covered with universal forest, the eye could trace the deep, narrow valleys full of brush, of the streams forming the Nambucca, curling into the deep mountain recesses." It was in this vicinity that Hodgkinson and his Aboriginal guides encountered the Gumbaynggir. "They seem inclined to be pretty friendly, and were of great assistance in enabling us to get rapidly through the entangled briars in the brush, which they beat down with their boomerangs; and in showing us the best crossing places over the rocky, steep-sided creeks and gullies, which we continually encountered."

inadequately reserved suballiance Backhousia myrtifolia - Lophostemon confertus - Tristaniopsis. The eucalypt and brushbox forest types recorded so far include tallowwood - Sydney blue gum (Type 47), New England blackbutt (Type 163), brush box (Type 53), grey gum - grey ironbark - white mahogany (Type 62) and dry blackbutt (Type 37). Forest Types 53, 62 and 37 are considered inadequately reserved whilst Type 47 is noted by the Forestry Commission to be "A very valuable type which can, however, be difficult to regenerate satisfactorily."

7 SPECIAL PLANTS. To date, approximately 450 plant species are known for the Dungir Conservation Area, including 4 species with a Rare or Threatened Australian Plant (ROTAP) code, 6 species extending beyond their previous known southern limit, and four species of biogeographical significance. The ROTAP species are Eucalyptus ancophila a grey ironbark (2R), E. fusiformis the Nambucca ironbark (2R), Bosistoa floydii Five-leaved bonewood (2RCi), and Amorphospermum whitei the rusty plum (3RCa). The species at their new southern limit are Rauwenhoffia leichardtii Zig Zag Vine, Eupomatia bennettii Small Bolwarra, Endiandra compressa Queensland Greenheart, Jasminum dallachii Soft Jasmine, Bosistoa floydii and Boehmeria platyphylla var. austroqueenslandica Native Ramie. Regionally rare and significant plants are Asplenium attenuatum Simple Spleenwort (uncommon/poorly collected but widespread), Deeringia arborescens Climbing Deeringia (disjunct distribution), Daphnandra sp. Black-Leaved Socketwood (disjunct distribution, near southern limit), and Boehmeria platyphylla var. austroqueenslandica (near southern limit). More comprehensive and systematic surveys would probably record additional species with new southern limits due to the southerly position of the Dungir Conservation Area within the Macleay-MacPherson overlap zone.

8 FAUNA. To date, a total of 136 terrestrial vertebrates have been recorded within the Dungir Conservation Area by natural scientists, including 23 mammals, 83 birds, 14 reptiles and 13 amphibians. The fauna are largely forest-dependant and sensitive to the effects of habitat fragmentation and modification. Strategies proposed by the Forestry Commission to ameliorate the impacts of logging on fauna will not amount to more than a token attempt at wildlife conservation and local population declines and local extinctions of species may be anticipated to result from forestry operations. The Fauna Impact Statement prepared for forestry operations did not meet basic legal requirements (e.g. the survey was not stratified) and in any case has yet to be approved.

9 SPECIAL ANIMALS. Dedication of the Dungir Conservation Area can be readily justified on the basis of biological conservation as the area supports a significant number of species that are listed on Schedule 12 of the National Parks and Wildlife Act. The known

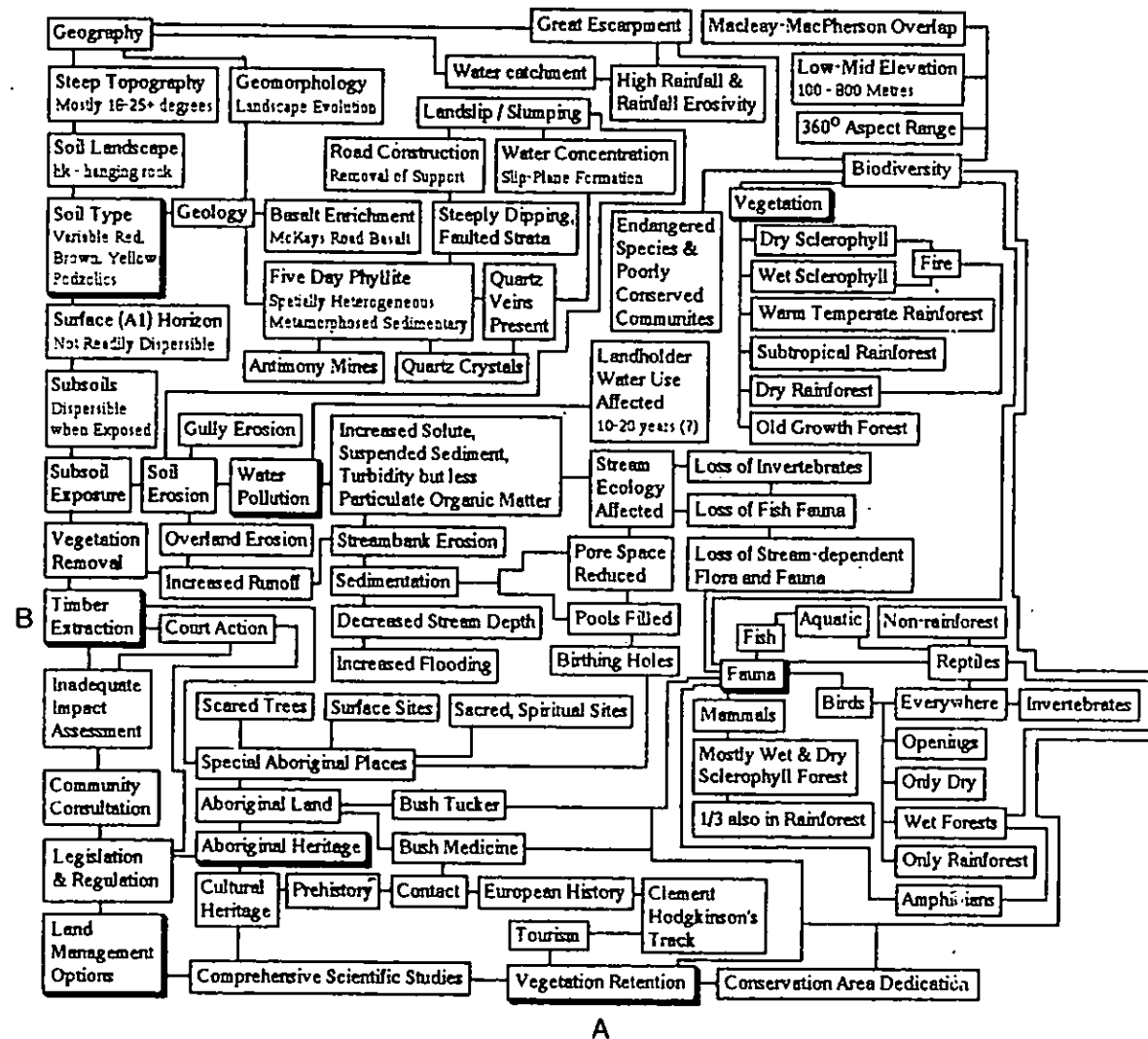
3 ENVIRONMENTAL IMPACT ASSESSMENT. In a previous court case concerning Mistake State Forest (Bailey v. Forestry Commission of NSW), the judge stated that "I am satisfied that the proposed logging operations of the Forestry Commission and the contractors must be likely to pose a substantial threat to landscape stability in the subject area in the longer term." and ordered that an EIS be prepared and that it specifically include "...data which would enable the Forestry Commission to assess properly the extent of highly dispersible sub-soils in areas proposed for logging activities." Unfortunately, the soil consultants report included with the EIS is flawed as only limited soil chemical analysis was undertaken for the large and heterogeneous 'hanging rock' soil landscape unit.

4 SOIL EROSION HAZARD. Soil erosion hazard must therefore be assessed with reference to the most recent Standard Erosion Mitigation Guidelines for Logging produced by the Department of Conservation and Land Management which would rate Mistake State Forest as 'high' to 'extreme', but mostly as 'extreme'. Soil loss associated with forestry operations from such an area would probably constitute a major water pollution event and cause significant changes to the ecology and hydrology of the Nambucca River. Such impacts could be long-term and cumulative given that gullying is a feature of soil erosion in this area and effective post-logging regeneration may not occur.

5 BIOLOGICAL DIVERSITY. The Dungir Conservation Area is very rich in both plant and animal species, although additional carefully planned and stratified studies are required before knowledge of the flora and fauna present can be considered adequate. This diversity is a result of the role of the Great Escarpment as a core refuge for native species, the altitude and aspect range of the area (100-800 metres, 0-360°) and its position within the Macleay-MacPherson floristic overlap zone (where tropical and temperate species overlap) along with the range of natural habitats represented.

6 VEGETATION. Preliminary aerial photograph interpretation indicates that significant areas of old growth forest remain scattered throughout the Dungir Conservation Area, more often on the south-facing slopes but sometimes covering entire catchments. Vegetation survey results have established that three rainforest sub-forms are present, namely, subtropical, warm temperate, and dry rainforest. Warm temperate rainforest is represented by the Ceratopetalum / Schizomeria - Caldcluvia suballiance and the inadequately reserved Ceratopetalum / Schizomeria - Acmena - Doryphora suballiance. Subtropical Rainforest is represented by the suballiances Doryphora - Daphandra micrantha - Dendrocnide - Ficus - Toona and Sloanea woollsii - Dysorxylum fraserianum - Argyreodendron actinophyllum - Caldcluvia along with the inadequately reserved Ficus-Dysorxylum fraserianum / Toona - Dendrocnide suballiance. Dry rainforest is

# Systems Model for Land Management in the Dungir Conservation Area



Landuse options within the Dungir Conservation Area are constrained by a multitude of interacting factors. To consider the consequences of either vegetation retention (A) or timber extraction (B), simply follow the lines connecting these land management options to the various environmental and cultural factors.















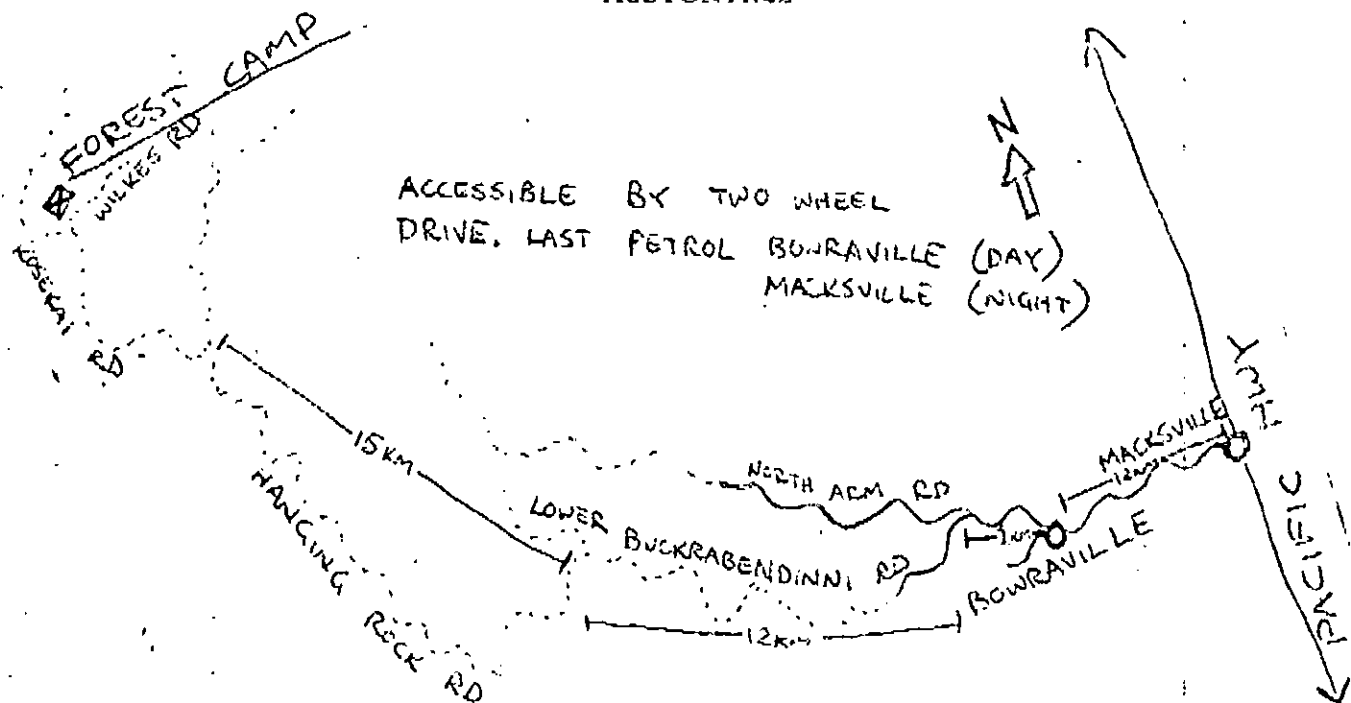
# SAVE THE MISTAKE

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CAMPS OF FOREST SURVEYORS AND PROTECTORS HAVE BEEN ESTABLISHED  
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# BIG BROTHER

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SAME TIME! CONTACT US!**

Issue 9 August 1994

# OLD FASHION DREAMING

While most people live  
a better life, the real work  
the island cities and in  
calling its friends.

The last infant for sale at our auction with the following particulars are not just East Asia, but throughout the South and Asia. A destroyed daily and new forests which provide a stable and safe home.

For millions of the Kooris who have lived with the forests, the land, the air and water. This is an invitation to all to experience the last dream of those who know the land.

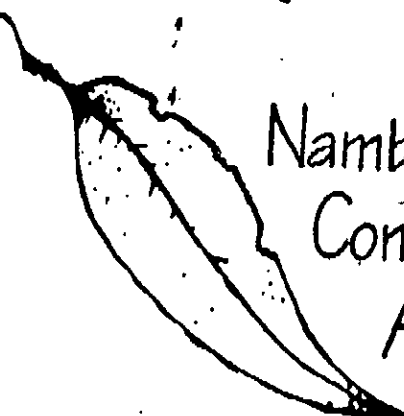
Kenneth C. Feltner and the author have been working together for many years on the history of the North End of Long Island Sound. Feltner is the author of the book "The North End of Long Island Sound" published by the Long Island Sound Museum.

At the moment I even happily feel that the Communist Party has not a single member who is not a Jew. Communist Party of Australia: I hope that all people of the rainbow nation can come to enjoy our knowledge and, I hope, wisdom together, so that we can build a new society, a new world.

...enjoy Gaudi culture first hand.  
...enjoy!

OMC NA





Nambucca Valley  
Conservation  
Association  
Inc. In NSW

AND

South Arm  
Catchment Protection  
Group

# MISTAKE NEWS

JULY 20 1993

In the Supreme Court on 20/7/93 the Forestry Commission gave an undertaking NOT to log, road or burn on slopes over 25° in the Catchment which effects Bev van Son's water supply in Compartments 341+342 of Mistake State Forest. until Aug 12 when a hearing for an interlocutory injunction will be heard.

YES! STAGE I SUPREME SUCCESS!

HOWEVER - the court case is one small area - one issue (of course, with MANY beneficial effects ie PRECEDENT) But much work remains to be done to save the last remnants of the Nambucca Valley's Old Growth. If you have time to spare and some skills to offer PHONE above no. or RAM 644108 who is organising work in the field to document the values of the area.

Stay tuned!

Let's care for the environment... Life depends on it Lyn O,  
SACPG + NVCA

# Its A Mistake!



The Mistake Forest rides the ridges from the Great Dividing range almost to the sea, in the Nambucca Valley area which is exactly halfway between Sydney and Brisbane. It contains the last intact subtropical coastal forest in Australia and is currently being logged by the NSW Forestry Commission (F.C.).

The Mistake is home to at least 24 *endangered species of animals* and many threatened species of plants. As you read this, trees which sustain breeding colonies of koalas are being cut in the Mistake. Extremely rare animals are being killed by the F.C., which is issued a 'Licence to Kill Endangered Species' by the National Parks and Wildlife Service (NPWS).

The Mistake is a watershed which actually produces pure, fresh water and retains it through droughts. Old Growth (unlogged forest) canopy produces water - cut forest sucks it up. Old Growth forests are now known to be our *only source of pure, fresh water* - a fact known to the Koori people since their Creation.

The Mistake contains many sites of significance to the local Koori people. A Koori Embassy has been established in the Mistake Forest by representatives of the local Gumbanggerri Tribe, who have inhabited the Nambucca and surrounding area since ancient times. Accredited flora and fauna surveyors are camped with them, finding more endangered plants and animals every week. Our camps are in the middle of the forest, surrounded by perfect examples of (so far) untouched Rainforest and other Old Growth of extraordinary beauty - which is some of the most diverse and complex yet studied.

This is the latest phase in a long series of activities by local residents intent on saving these last forests for all time. In 1987 Trevor Baily, a resident of the upper reaches of South creek, west of Bowraville, became concerned about the siltation of the creek below forestry operations occurring at the time. He was able to legally force the forestry commission to prepare an environmental impact statement (EIS) before logging could proceed. The EIS was done and although deemed inadequate for many reasons by its critics, logging recommenced in the Mistake State Forest in October 1992.

## WATER CATCHMENT

The Environment Protection Authority (EPA) gives the F.C. a licence to pollute waters throughout NSW. This forest is part of the water catchment area for three towns, two coastal settlements and hundreds of farms. Several research studies show that Old Growth (100 years or more) yields more than 3 times as much water to its downstream creeks and rivers as does regrowth - and releases it slowly through dry times. In these studies Old Growth yielded 12 megalitres of water per hectare per year while regrowth (7 years after logging) used 3 megalitres per hectare per year. These studies were done in Victoria. Results from a study by the F.C. in the Karuah River catchment on the north coast of NSW indicate a similar trend - which will culminate in coastal deserts if we don't change course NOW. The long-term effects to our communities, towns, industries and cities are already likely to be disastrous. We all need water.

## EROSION

42% of this forest is over 25 degree slopes. Areas up to 35 degrees are being logged. Experts agree that logging or roading in areas over 25 degrees is a huge erosion risk.

In some other forests on the North Coast, logging is already banned over 25 degrees.

Professor J. Mc Garity, an eminent soil scientist who has studied Mistake SF, says logging and roading on steep lands (over 25 degrees) will lead to considerable erosion and serious initial pollution of the nearby stream system. The risk of permanent damage to the soil and aquatic environment is too great to allow the logging to proceed.

## OLD GROWTH

2,140 Ha of old growth remain in Mistake Forest. 1,800 Ha of this is planned to be logged by the forestry Commission.

The logging of the remaining old growth will cost the Nambucca Shire at least 27 thousand megalitres in lost water yield per year. Professor H. Recher estimates there are less than 5% of NSW forests remaining as old growth.

The Nambucca Shire is nearly finished the process of logging the last of its old growth. This was due to be finished in 1984.

The National Forest Policy Statement, signed by Premier Fahey, is not being adhered to in the Mistake Forest. It states that Forest agencies will avoid damaging high conservation old growth forests until regional assessments are done. No Forestry Commission Environmental Impact Statements have assessed Old Growth forests.

## WILDLIFE

At least 24 endangered species - including Koalas, Yellow-bellied Gliders, Sooty Owls, Spotted-Tailed Quolls, Sphagnum Frogs, Rufous Scrub Birds, Parma Wallabies, Long-nosed Potoroos, rare bats and many more creatures have been found in the Mistake. The NPWS has stated that the Mistake State Forest EIS was inadequate, especially the surveys for endangered species and the prescriptions to protect them.

The NPWS required a Fauna Impact Statement to be done. This has not yet been deemed adequate by the NPWS and is likely to be rejected - meanwhile, the FC is still logging.

NPWS recommendations include:

- \* Establishing a flora reserve
- \* Doing additional specific surveys
- \* Linking Old growth Areas with wildlife corridors
- \* Retention of specific species of eucalypts (Grey Gums, Grey Ironbarks, White Mahoganies) as these have almost been wiped out on the range.
- \* Leaving all Brush Box trees which have a rainforest understory

NONE of the above recommendations have been met and logging continues under a 'temporary' LICENCE TO TAKE AND KILL ENDANGERED FAUNA which was issued STATE-WIDE with no environmental assessment by Parliament - to keep the timber industry going.

The NPWS has the power to enforce its recommendations. It has so far failed to do so.

## ABORIGINAL SITES

The mistake forest is rich in Aboriginal sites - one of them being a ceremonial Bora Ring. Mountain peaks are also of significance. It is thought the Mistake area was where the "clever men" of the Gumbangerrie tribe retreat for meditations, where they would be visited by the wise spirits and given advice.

The EIS states that the commission will consult

with local Aboriginal Land Councils and give them detailed maps before logging.

No consultations are yet recorded on the Land Councils' books and no maps have been provided. NPWS has recommended that the F.C. survey for and map archaeological sites before logging - but this has not yet occurred.

The EIS stated that full consultation with Land Councils would occur before logging the upper slopes and peaks, and that contractors would be trained in recognising sites and artefacts. This has not occurred either.

## JOBS

Jobs are not only provided by logging. They come from tourism, maintenance and construction of public facilities, the commercial recreation industry (ie. cabins, trailrides, 4wd tours etc.) These are more sustainable to the local economy in the long term.

The EIS for Mistake says work will be provided for a contracting team of 3 men for a period of five years to log the old growth remaining (to get 12,040 cubic metres per year) and then the cut will reduce to the sustainable level of 9,400 cubic metres per year.

The cost/benefit analysis of logging steep, upper catchment areas has not yet been done. Things such as reduced water yield, soil erosion, air and water quality degradation, loss of species, loss of scientific, educational, cultural and tourism resource have not been taken into account. In 77 years of managing the public forests of NSW for the people of NSW the Forestry Commission has succeeded in going into debt for 110 million dollars. Our Old Growth forests are nearly gone and we have paid to have them carted away.

Local people have given up on the F.C. and are now conducting surveys of their own at their own expense. Their time is being used productively studying and enjoying their environment.

A detailed, independent proposal to turn the Mistake Forest into a National Park is now underway - but local District Forester Steve Rayson has said there is "no way" the F.C. will turn this land over to National Parks.

Local people have been camped in the Mistake for months, walking through and surveying these extraordinary forest bioregions. Come and experience them for yourself! The forest is very close to the coast and accessible by any two wheel drive vehicle. If you can't come yourself, please copy this and/or pass it on.

You can send donations of money, food or equipment to the Old Growth Survival Fund, c/- the Bellingen Environment Centre, PO Box 152 Bellingen, 2454.  
Om Gaia!

This is a rough copy  
of Rams

Breaches doc.

without photos

in case you don't  
have it.

Better one available  
(amended)  
New one being done  
by Ram

John for your info :

From Jim Tedder: (March 16)

Nulla 5-Day Creek St-

Western slopes of  
head H<sub>2</sub>O's Nulla Creek.

Up Nulla Creek  
Western ridge  
(travel along)  
it leads to this  
"horror" road

Landscapes still  
occurring years  
after logging.

Tell John. ↗

Bear in mind for  
someone to visit,  
photograph in  
future

JFT

Bears on argument  
for SENG's that  
erosion does continue  
in some situations :.

\* ie  
40x  
annual  
soil loss

\* multiplying by 40\* for  
40yr logging operations no good



*How To Vote for*

# THE GREENS

*for*

## COWPER

***For the House of Representatives***

*Green Ballot Paper*

Remember: Place a number in each box as suggested below.



Jillian Cranny

- 1** CRANNY Jillian (The Greens)
- 7** WALLBRIDGE Darrel (Confederate Action Party)
- 3** FORRESTER Roy (Natural Law Party)
- 6** GLEESON Nigel (Citizens' Electoral Council of Australia)
- 5** NEHL Garry (National Party)
- 4** SEKFY Paul (Australian Labor Party)
- 2** PIKE Trevor John (Australian Democrats)

## For The Senate

*White Ballot Paper*

You only have to put number **1** in the box headed with the letter **N** above the line.

(Or number every square below the line)

- Fair Taxation  
NOT GST
- Protect and improve  
Medicare
- No Ocean Outfalls
- Environmental  
Industries create  
JOBS

<b>N</b>	
<b>1</b>	
<b>THE GREENS</b>	
<b>N</b>	
<b>THE GREENS</b>	
<input type="checkbox"/>	BRIGHAM Steve
<input type="checkbox"/>	WALLACE Joy
<input type="checkbox"/>	COHEN Ian
<input type="checkbox"/>	STEAD Cecily

Authorised by S.A.Morgan, Lot 22, Dorrigo Rd., Thora NSW 2454  
Desktop Publishing by Ad Hoc Graphics 57 2788  
Printed by Bananacoast Printers, Orlando St., Coffs Harbour  
Printed on 100% re-cycled paper

**PLEASE RETURN FOR RE-USE**

John for your info:

from Jim Tedder (Mar 16)

re Legal Aid C'n

Jim has letter from Hannaford  
saying:

\$3.1 million added

to Legal Aid

Commission

budget b/c

now don't have

to pay payroll

tax.

Jim

**How To Vote for**

# **THE GREENS**

**for**

## **COWPER**

***For the House of  
Representatives***

***Green Ballot Paper***

Remember: Place a  
number in each box  
as suggested below.



**Jillian Cranny**

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- 2 PIKE Trevor John (Australian Democrats)**

## **For The Senate**



# Nambucca Valley Conservation Association

Inc. in NSW

The District Forester,  
Mr Steve Rayson,  
Urunga District,  
PO Box 63,  
Urunga 2455 NSW.

P.O. Box 123,

Bowraville, 2449.

Ph/Fax (065) 647808

April 18, 1993

Dear Sir,

Please find below our comments and requests for amendment to the Draft Harvesting Plan for compartments 341 and 342 in Mistake State Forest.

To occur prior to final decision on any Harvesting Plan for 341/342:

1. Recommend: That fauna surveys be undertaken in the old growth mapped areas within 341/342 prior to logging. (In line with the National Forest Policy, the Commission's Corporate Plan objective of ecological sustainability and recognising the current temporary license to take and kill endangered fauna was granted without fauna assessment.) *(I'm not going to accept that rec.)*
2. Recommend: That the new Standard Erosion Mitigation Guidelines (5/3/93) be applied to cpts 341/342 especially the Universal Soil Loss Equation Formula. *As they are difficult & need training we're not to introduce them at this stage, no joint understanding so "No" not going to intro. them b/c that's a bit of an instruction. (ALM/FC training in a few weeks. I'm keen to get them going asap. some parts I can intro. in operation. Probably too much fire over the years" it be Rqs. acknowledged that the regrowth areas within 342 are not yet ready to be logged again. We believe it can be logged & get adequate regen.*
3. Recommend: That, due to Forestry Commission's assessment of only 8 year's ago re opt. 342: "Little regeneration from old field strips operation. Probably too much fire over the years" it be Rqs. acknowledged that the regrowth areas within 342 are not yet ready to be logged again. *We believe it can be logged & get adequate regen.*
4. Recommend: That due to the photos and verbal testimony of deeply eroded (10 feet and more) old snig tracks, Forestry Commission acknowledge that environmental damage and degradation from soil erosion has been caused by previous logging operations in these compartments. *we ackn. that in the past in some areas there was erosion caused. I haven't seen that partic. area.*
5. Recommend: That specific testing be undertaken to establish the risk of mass wasting from either snig tracks or logging is non-existent. *We looked pretty hard over bulk of area didn't find evidence of mass wasting & don't believe we'd signing in. potential*
6. Recommend: That no logging be permitted on slopes greater than 25°. *no well considered in EIS.*
7. Recommend: That the location of major snig tracks be surveyed and marked on the plan prior to construction. *Will be looked at by foreman & assess where to put them*
8. Recommend: That log dumps be marked on the plan for cpt. 341. *NO, If we id. any additional then we will have variation*
9. Recommend: That log dumps be numbered on the plan for ease of identification and reference. *OK, yes.*

- No we/9 don't have the time to come & inspect.

Lets care for the environment... Life depends on it

We expect regen. to occur so wouldn't replant

This is what<sup>(341</sup>  
NVCA asked for<sup>342)</sup>  
in meeting with  
District Forester  
Steve Rayson

18/4/93

His answers are  
scribbled beneath  
R205

We will adopt that part of the SENG's.

10. Recommend: That no logging take place within filter strips.  
 SENG's 40m catchment, 30m buffer side & no logging within them.
11. Recommend: That the Coffs Harbour Code of Logging Practice be applied to these cpts. as they are now in the Coffs Harbour Forestry Region. (Smaller catchments warrant a filter strip in this code.) No.
12. Recommend: That protection from logging also apply to all major drainage lines as marked on the attached map in a pink dotted line to a distance of 10 metres on either side. as per SENG's
13. Recommend: That grid north be adjusted 90° to the correct position.  
 a machinery line  
~~Grid~~ drafting mistake
14. Recommend: That two observers from NVCA be invited to go with Forestry Commission officers on their inspection/field trip to cpts. for which a draft Harvesting Plan is to be drawn up in order to gain an appreciation of the thinking behind the harvesting plans (ie learn to appreciate a "timber" perspective rather than purely a "nature/wildlife" perspective). A lot of other people have asked for that. We don't believe it is that workable. We are keen to have our groups educated up. For we will write it at our convenience.
15. Recommend: That the additional areas over 35° as marked on the attached map in pale orange fluorescent be excluded from logging.  
 we will be losing Box. we will look for the Rf & not log it.
16. Recommend: That the rainforest areas marked on the attached map in bright green (and marked on the forest type map as type 53, Brushbox) be excluded from logging.  
 if these areas are over 35° we won't log them. 35° is determined in the field.
17. Recommend: That the areas marked in pale purple on the attached map be excluded from logging for the purpose of visual protection along the ridgeline and along Alco and Kosekai Roads.  
 No. only 50%
18. Recommend: That the area hatched in blue on the attached map be excluded from logging for the purpose of creating infill for a contiguous area of Preserved Natural Forest.  
 no.
19. Recommend: That any final Harvesting Plan be made available to NVCA a week prior to any logging commencing. we'll be doing a final HP as soon as it's dry enough. Phone call when final plan ready & before logging comm.
20. Recommend: That Forestry Commission note that the South Arm Catchment Protection Group is commissioning independent studies of fauna, erosion hazard and conservation values within Mistake State Forest; that the outcome of these studies could amend our present position of acknowledging that, should all our recommendations be adopted and the information yielded be favourable to logging, then some limited selective logging would be acceptable.

We note that

Special Purpose Permits needed.

It could also amend our present position

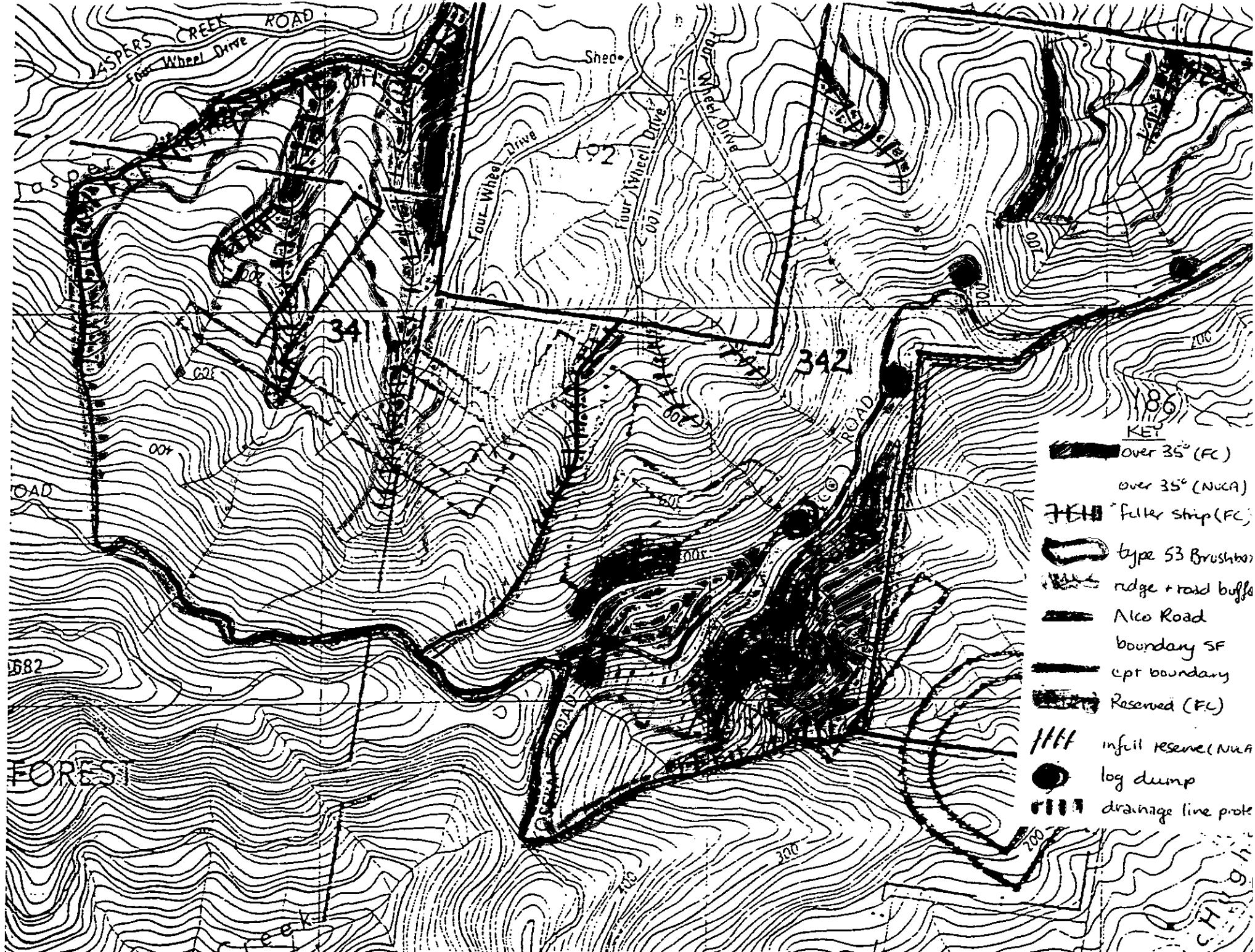
Thankyou for your consideration of our requests. We look forward to receiving your response.

Sincerely,

Lyn Orrego  
 (Vice-President)

"Order of Working? log dumps used & closed.  
 we want to save some of the flatter areas for dry weather."

"We will investigate special area along Alco Rd."



## Info package re Mistake State Forest

### Enclosed:

- Draft Harvesting Plan cpts 341/342 Mistake  
(any glaring things we've missed?)  
Could you pass it on to Tim/Mark's files?
- Slope class map (FC) overlaid on cpts 341/342 map
- Sample survey form (we used in forest)
- NUCA letter/response to Draft HP with 20 reco's  
most of which were rejected by District Forester

---

Also: — a rough copy of Ravi's Breaches doc  
in case you never got the better one  
like I still haven't.

— 2 notes for your info (oldish)

— + a letter for Dailan if you wouldn't  
mind giving it to him. Thanks.

Good luck Friday

and — of course — always.

XX Lyn.



ADDENDUM TO SHIRE CLERK'S REPORT  
COUNCIL MEETING - 1ST NOVEMBER, 1990.

---

I N D E X

ITEM

PAGE NO.

16. RATING REVIEW - "THE OAKES REPORT"

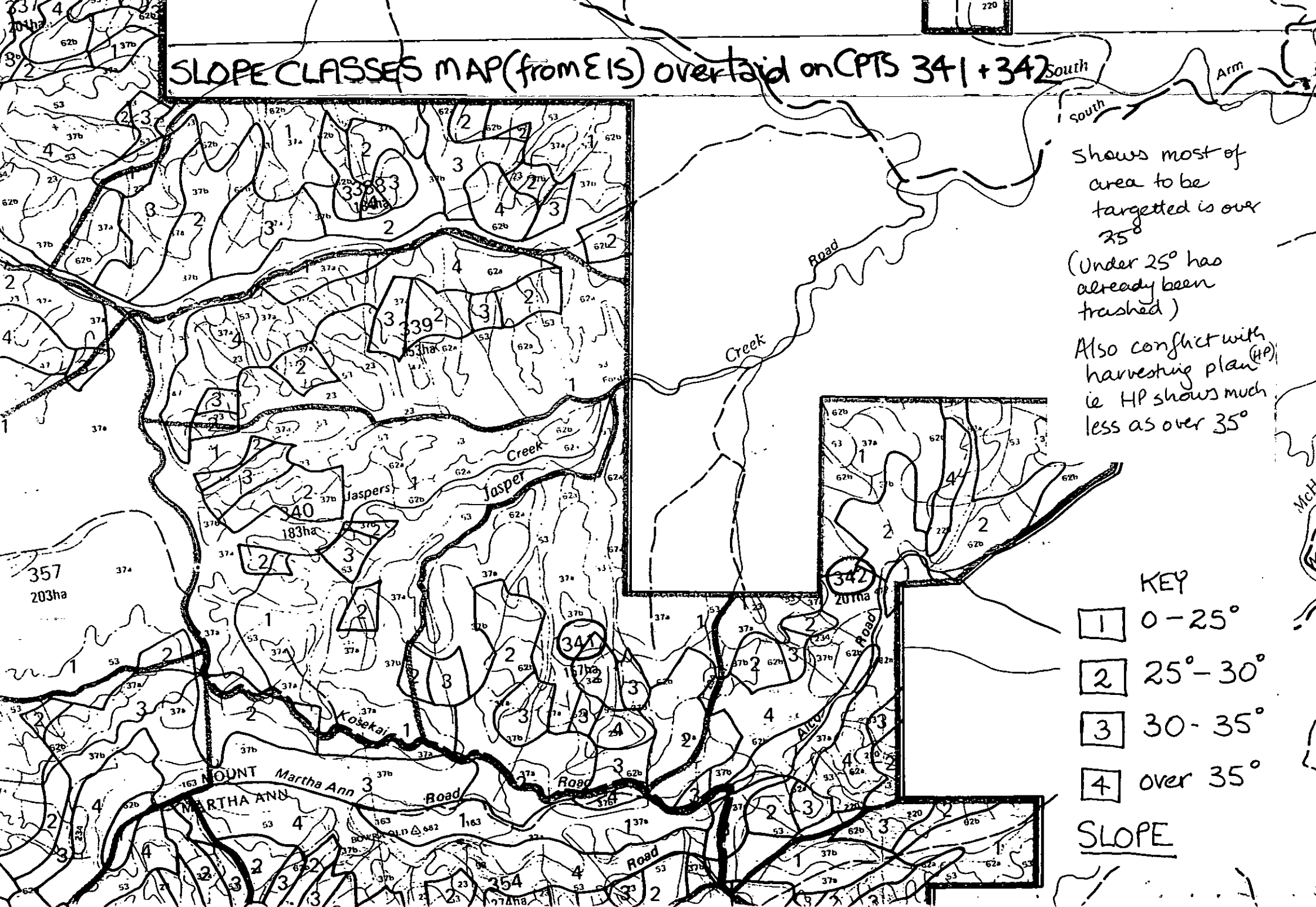
1 to 7



Defer = <sup>special</sup> til meeting on rates.

(w) read other  
stuff in rural  
definitions

SLOPE CLASSES MAP (from EIS) overlaid on CPTS 341 + 342 <sup>South</sup>



Shows most of area to be targetted is over 25%

(Under 25° has already been trashed)

Also conflict with  
harvesting plan<sup>(HP)</sup>  
ie HP shows much  
less as over 35°

KEY

- 1  $0-25^{\circ}$
- 2  $25^{\circ}-30^{\circ}$
- 3  $30-35^{\circ}$
- 4 over  $35^{\circ}$

SLOPE



URUNGA DISTRICT

1.	<u>Area Description</u>

### 1.1 Location

State Forest - Mistake S.F. No. 525  
Compartment - 341 and 342  
Gross Area - Cpt 341 - 155ha, Cpt 342 - 196ha -  
351ha - Total  
Nett Area (to be logged) - approx. 300ha

## 2. Operation Description

## 2.1 Operation Type

This logging will be a fully integrated operation based on group selection and single tree logging for poles, girders, veneer logs and quota, salvage and sleeper quality sawlogs.

## 2.2 Licensees

All licensees within Urunga District may purchase products from this operation, subject to appropriate licence endorsements and sales arrangements being made.

### 2.3 Contractor

Agricultural Development Services Pty Ltd, trading as Hillery Bros  
Pty Ltd.

## 2.4 Volume Estimates / (Gross)

Poles Piles and Girders	50
Veneer	150
Quota	2100
Salvage and Sleepers	<u>1200</u>
	3500m³

### MAP LEGEND

**State Forest Boundary**

### Compartment Boundary

## Filter Strips

Preserved Natural Forest

Areas above 35°

## Wet Weather dumps

undary  
undary  
l Forest  
s

**DRAFT**

## 2.5 Tenure

All State Forest, none leased

## 2.6 Map See attached

### Special Features

- 2.6.1 Boundaries adjoining P.P.  
2.6.2 An area of about 30 ha of forest types 62a & 62b has been reserved from logging as preserved natural forest.

## PART B OPERATIONAL REQUIREMENTS

### 3. Codes and Procedures for Operators

3.1 Plan availability - a copy of this Harvesting Plan will be distributed to the contractor, F.A. Marketing, Supervising Foreman and Forester, N.P.&W.S. and to any licensees requiring a copy.

### 3.2 Order of working.

Most of the harvesting area is suitable for wet weather operations subject to normal operating procedures and limitations. Work should commence at the forest boundary on the North East end of Alco Road.

### 3.3 Product specification.

- i) Poles Piles and Girders - per Australian Standards.
- ii) Veneer - As defined in specifications of 6-11-87 for hardwood veneer logs in Port Macquarie Region.
- iii) Compulsory (Quota) Sawlogs - As defined in Appendix One of the Code of Logging Practices (Port Macquarie Region).
- iv) Sleepers & Other S&K Timber - All material not meeting the standards in (i), (ii) and (iii) above, capable of yielding such products.
- v) Thinnings Sawlogs - Sawlogs with c.d.u.b. less than 40cm but otherwise meeting specifications for sawlogs in Appendix One of Code of Logging Practices (Port Macquarie Region).
- vi) Hardwood Ex-Quota Sawlogs - All other merchantable logs not meeting the above specifications to a minimum utilization standard of 20cm small end diameter under bark.

### 3.4 Logging modification/exclusion areas

Logging of slopes in the range 25° - 35° may be reduced in extent and intensity by the direction of the supervising forester or foreman if necessary to reduce visual impacts. This will also apply to the higher altitude areas of the logging area and to the Alco road ridgeline. Any such modifications shall aim at retaining a higher percentage of the green crown up to a maximum of 50% crown retention.

No logging shall occur within the area of Preserved Natural Forest as shown on the attached map.

### 3.5 Tree and area marking code

#### 3.5.1 Tree marking code

Trees to be removed will be marked with a red horizontal line or a red 'p' (poles). Only trees so marked are to be felled. Trees to be retained will be marked with a yellow horizontal line, with the exception of habitat trees which shall be marked with a yellow 'H'. Recruitment habitat trees shall be marked with a yellow 'RH'.

#### 3.5.2 Area marking code

A line not to be crossed by machinery, but beyond which trees may be removed (e.g. filter strip, visual resource protection area) shall be marked with double horizontal yellow lines.

A line which may not be crossed with machinery, nor have trees felled beyond it or across it (e.g. reserves, conservation area etc.) shall be marked with a diagonal yellow cross (X).

Roads, tracks or major snig tracks requiring construction may be marked with orange paint. Dump sites may also be marked out using orange paint.

Blue shall be used for all log segregation.

No other colours or symbols should be used in the harvesting area.

### 3.6 Environmental protection prescriptions

3.6.1 Roads - No snigging shall be allowed along Kosekai Road. Alco Road is piped. No debris shall be left in sumps or table drains. Snigging along Alco Road shall not be undertaken except with the foreman's permission and will only be approved when absolutely necessary. All road works shall comply fully with the SEMC 1990 or any replacement document and must be approved by the supervisor.

3.6.2 Dumps - as per SEMC's

3.6.3 Drainage lines - This area is within the Hanging Rock Landscape Unit for which a risk of mass wasting has been identified. Filter strips, 20m either side of streams are shown on the attached map and have been applied to smaller catchments than prescribed by the SEMC. Otherwise prevailing SEMC conditions shall be implemented.

3.6.4 Snig tracks - The soil in the logging area is predominantly of average erodibility. Snig track cross banks shall have an effective height of 50cm and shall be spaced as follows:

<u>Snig Track Slope</u>	<u>Cross Bank Spacing</u>
0 - 14 degrees	60m
15 - 19 degrees	40m
20 - 24 degrees	20m
25 - 30 degrees	15m

3.6.5 Mass Wasting

No specific areas of mass wasting risk have been identified. Should any such areas be identified during logging they shall be subject to modified prescriptions commensurate with the risk.

3.7 Wet weather prescriptions

As per Code of Logging Practices for Port Macquarie Region 1988, and SEMC's 1990. No logging is to occur while there is run off from any snig track surface.

### 3.8.1. Harvesting Objectives.

- Harvesting of hardwood trees will be based on the retention of trees defined by the following criteria.
  - Trees capable of significantly improving their net economic worth into a subsequent cutting cycle.
  - The minimizing of damage to trees retained for future economic purposes or for the maintenance of vegetative cover.
  - The prevention of damage to rainforest types.
  - The prevention of damage to capital improvements either on State Forests or adjoining lands.
  - The minimising of soil disturbance to that required to ensure successful regeneration establishment.
  - The retention of mature or overmature hollow-bearing stems at the rate of three trees per hectare to provide for the habitat requirements of hollow dependant fauna.
  - The retention of recruitment stock at a similar level for (f) above.
  - Other inherent attributes of individuals or groups of trees, for example seed production, outstanding forms or scientific or educational value.
  - Safety requirements.
  - The maintenance of overall vegetative cover for aesthetic, visual or catchment protection reasons, or as required in Special Emphasis Areas.
- Subject to other requirements, harvesting of hardwood trees will be based on the removal of trees that satisfy the following criteria.
  - Trees having reached their highest economic end use for which markets are practically and economically available.
  - Trees, the removal of which it is judged would result in more valuable increment on preferred retained trees.
  - Trees, the removal of which it is judged would result in improved growth rates on preferred retained trees.
  - The silvicultural and economic management of the stand would be improved as a whole eg, retention of defined size classes.
  - The creation of gaps of sufficient size to ensure adequate regeneration.
  - Those trees subject to unrecoverable damage or disease attack.
  - Safety requirements.
  - The maximization of stand thinning response for subsequent yield requirements.
  - The likelihood of death or damage before harvesting in a subsequent cutting cycle.
  - Special circumstances under which their removal is unavoidable eg. roadlines, powerlines.

### 3.8.2. Habitat Retention

At least three habitat trees per hectare and three 'recruitment' habitat trees per hectare should be retained. These habitat trees should be grouped wherever possible. Additional habitat shall also be retained, as follows:

#### Koalas

Where a koala or recent evidence of a koala in a tree is located the tree will be retained together with all other trees within a radius of 100 metres pending an inspection by a forest officer to determine whether or not other koalas are present in the vicinity.

Where it is determined that a resident colony is present, (3 or more koalas) the area of the colony plus a radius of 20 metres will be preserved while the colony is present.

Where only one or two koalas are present, a 20 metre radius around each occupied tree shall be preserved while the koalas are present.

#### Yellow Bellied Gliders

Where a Yellow Bellied Glider feed tree is located, this tree and 3 immediately adjacent should be retained and not disturbed.

#### Sphagnum Frog

Strict adherence to SEMC requirements regarding machinery and streams and drainage lines must be observed to avoid impact on this species.

#### Birds of Prey

Where nest or roost trees of birds of prey (owls, eagles, hawks etc) are located these trees together with several adjacent trees should be retained.

#### Glossy Black Cockatoo

Areas of Casuarina species shall not be unnecessarily cleared or destroyed during logging operations in order to maintain food sources for these birds.

### 3.8.3 Boundaries

Except for fenced State Forest boundaries, the logging area boundaries shall be located and clearly marked with a diagonal yellow cross as per section 3.5.2. Where this boundary corresponds with a creek or filter strip boundary it shall be marked with a double yellow stripe as per section 3.5.2.

No trees are to be felled into private property or over any fences. Accidental damage to any fence shall be repaired immediately and the incident reported to the supervising foreman at the earliest opportunity.

The first gate on Alco Road may be left open upon the commencement of logging. Mr A.V. Breeze "Greenhills", Mr Hughs Cr. Bowraville (Ph. 065 647379) is to be notified upon commencement of logging. The fence along Alco Road belongs to Mr Breeze. It may be cut to allow ramping of logs on the ridge along Alco Road but the fence must be restored upon cessation of logging, by the contractor.

### 3.8.4 Immature Areas

Areas of regrowth from previous operations or natural events should be avoided wherever possible.

### 3.8.5 Additional Tree Felling Prescriptions

- i) When trees are to be felled within 2 tree lengths of any road, the road must be closed in both directions until felling and snagging is completed. The supervising foreman shall be consulted and will approve methods of such closure in every case.
- ii) Trees or sites shall be excluded from harvesting, or harvesting shall be modified by direction of the supervisor, to protect values subsequently identified during harvesting such as unusual or rare plants or animals, scenic areas, historic relics or Aboriginal site values.

PART C CONSIDERATIONS ON WHICH PLAN IS BASED

4. Physical, Vegetation and Wildlife Descriptive Information

Field Inspection made on 23-3-93

4.1 General physical description

The area consists of the northern fall from Kosekai and Alco roads into Jaspers Creek which is a major tributary of South Arm with elevations ranging from about 100 metres A.S.L. to 450m A.S.L.

Approximate slope class areas are as follows:

0 - 25°	171ha
25° 35°	158ha
>35°	22ha
	351ha

4.2 Forest types and vegetation

Forest type present Types 36/37 Blackbutt  
Types 62a Drf Hardwood  
Types 53 Brushbox  
other (rock/cleared)

approx areas
175ha
119ha
48ha
9ha
351ha

4.3 Stand description

The Northern Section of the Alco Road area was logged for poles only in 1984. Otherwise the remainder of the areas were last logged in the mid nineteen fifties and generally only the lower slope areas were cut with the logs being removed through the private property in the Jaspers Creek area. Parts of the higher elevation, steeper areas are substantially unlogged and these are the areas proposed for most of the log extraction subject to the other provisions of this plan. The drier 62a and 62b forest types appear to have been subjected to periodic wildfire coming uphill from the private property.

4.4 Geology and Soils

Parent materials are predominantly siltstone and siliceous sandstone which produce soils of average erodibility. With the exclusion of areas of slope above 35° and filter strips being applied to streams and drainage lines having catchments substantially less than the specified 100 hectares, the overall erosion hazard is assessed as average.

The propensity of these soils within the Hanging Rock Landscape Unit to erode by mass wasting is noted. There will be no construction of minor roads and major snig tracks will be designed to minimise soil movements and side cutting wherever possible. Should potential mass wasting areas be identified during the operation the logging intensities shall be modified accordingly as per section 3.6 of this plan.

4.5 Wildlife

A Fauna Impact Survey has been carried out for this forest pursuant to the Endangered Fauna Interim Protection Act. Fauna of concern within the area are protected by the prescriptions within Section 3.8.2 of the plan

PART D REGULATION AND CERTIFICATION

6. Harvesting Plan Regulation

6.1 Licences

All persons operating under the provisions of this harvesting plan shall be suitably licenced by the Forestry Commission of N.S.W., and shall comply with the licensing requirements of other relevant authorities.

6.2 Regulations

All operations undertaken within the plan area shall be carried out in full compliance with the following:

- Timber, Contractor and Operators Licence Conditions.
- Code of Logging Practices, Port Macquarie Region, 1988.
- Standard Erosion Mitigation Conditions for logging in N.S.W., 1990 or its replacement.
- All relevant legislation.

6.3 Harvesting Plan Availability

A copy of this harvesting plan is required to be available within the harvesting plan area at all times that felling, snigging or environmental work (i.e. drainage) is being undertaken

6.4 Harvesting Plan Infringement

Non compliance with this plan or with other conditions, codes and laws relating to it will result in formal action being taken in the form of a Warning Letter, Penalty Notice or Suspension of Licences depending on the severity of the breach.



7. Certification

7.1 Plan preparation

7.1.1 Preparation - Prepared by Name ..... J. Ball  
Signature .....  
Title .....  
Date ..... 8/1/80

7.1.2 Approval - Approved by Name .....  
Signature .....  
Title .....  
Date .....

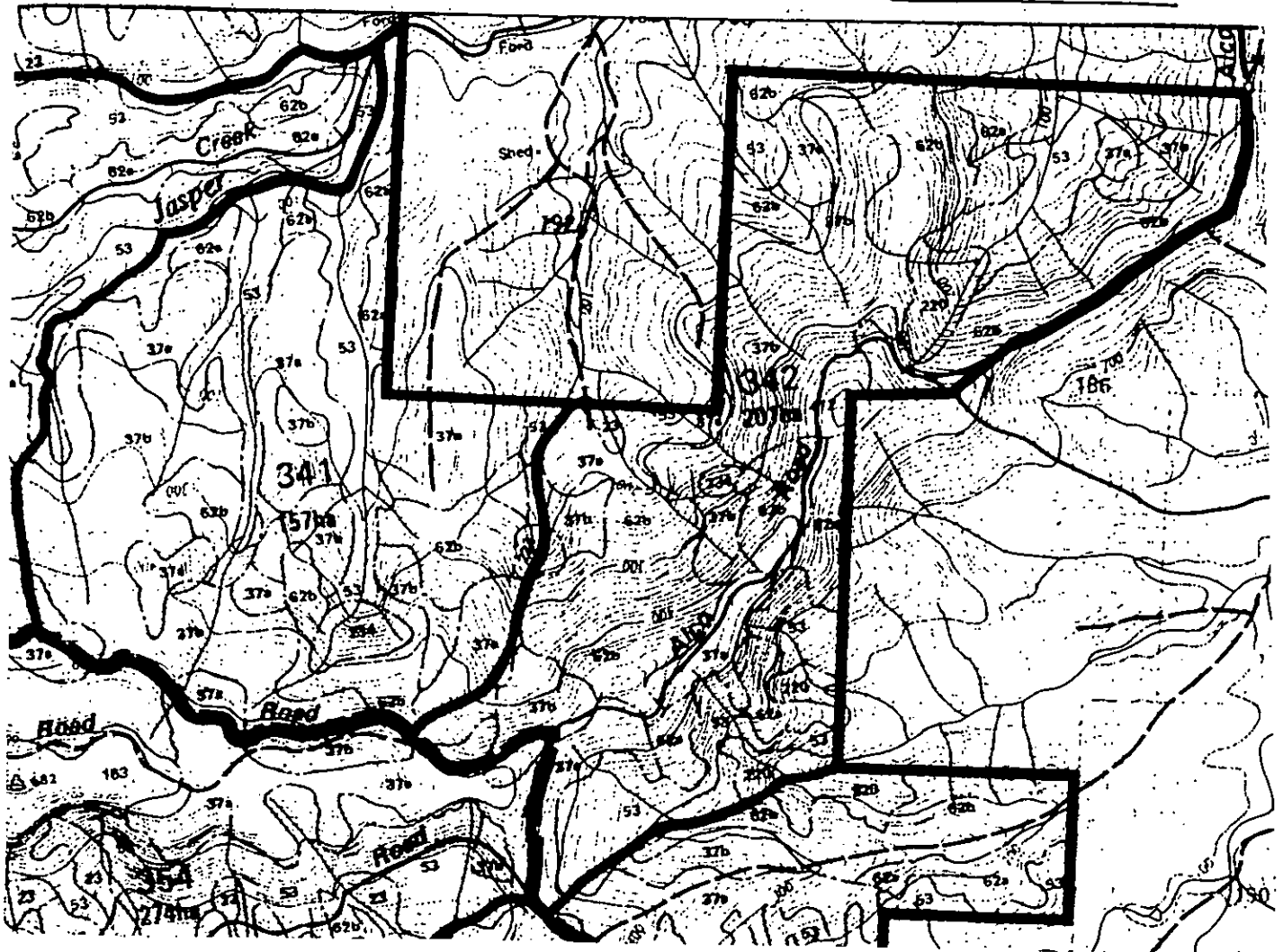
7.2 Plan completion

Field operations have been satisfactory completed.

Name .....  
Signature .....  
Title .....  
Date .....

DRAFT

Mistake State Forest Cpts 341 + 342 Survey Form.



Mark where you walked, observations, date + sign (more  
info over→)

Sample  
Survey  
form

## Things to look for generally:

forest type : any mistakes in FC typing

old growth

immature

Steepness: does it coincide with Harvest Plan  
ie any extra areas over 35°?

Slips

gullies from old logging operations

Scats (droppings of fauna especially  
ones with hairs in them)

flora

birds heard : make a list

recommendations

any <sup>other</sup> observations

The following is a list of observed breaches of the Code of Logging Practices (C.L.P.), Forest Management Service Standard Erosion Mitigation Conditions for Logging in NSW 1990 (S.E.M.C.), Harvest Plan for Compartments 368 & 369, Mistake State Forest, Environmental Impact Statement (E.I.S.) and Fauna Impact Statement (F.I.S.).

On the first occasion on which we encountered the logging contractors it was in Lomber Park. In early March, I witnessed Vanessa Farmer ask one of the loggers, "Have you seen any koalas?" "Not today," he replied. "What about on other days," she asked. He refused to answer the question.

We found a number of "white" birds in the compartment where  
 scalars had obviously been, frequently climbing grey gums  
 within logging coupe and adjacent to or surrounded by  
 extensive logging.

Using a clinometer to measure slopes numerous areas were shown to exceed 35 degrees, the maximum permissible slope on which logging is allowed. Logging was then only with specific authorization. In some cases roads traversed hills which exceeded this slope, while in other areas logging was undertaken. In one instance, a large Bluegum was lost down a 39 degree slope, and left in a gully with the snapped snig cable still wrapped around it.

"I was at about 600 ft. above sea level. I saw a large concrete bank  
about 100 ft. long and 10 ft. wide, and of  
compartment 368 with three other people. I noted the  
presence of some large Coachwoods off the old road but  
visible from it. Two days later, these Coachwoods -  
definitely not on the road - were seen. In one instance  
the tree had been cut down and appeared to take out  
of place the Coachwood. It seemed the Coachwood had been  
removed from the road and its stump removed,  
apparently in drainage operations.

This roadwork was done without prior taping to mark its course. At least two of roads were plowed through the forest in two days in cold weather by a single bulldozer. In addition, about half a dozen of the roads are an extra section past where the road is supposed to end.

When repeatedly asked by Dr. Lynn Orrego of Nambucca  
Island and others for the annexures to the Harvest Plan  
documenting this matter, the following were provided: Forester John  
Ball, dated 25 April 1961, and Forester John Ball, dated 25 April 1961.

coupled with blading off.

All this roading in the southeastern end of Compartment 368 was left without any table d'assise or crossbanks in

the middle of March. Acting D.F. John Dail informed myself and others on 21st March that the loading was being halted because of the approaching cyclone. The Cyclone Rone is the only one that has been left in an undrained condition, causing many tonnes of soil to end up in creek and gully systems.

Virtually all the roadwork within the compartments had been bladed off - prohibited unless specifically authorized for specific sections of road.

Many creeks and drainage lines had been crossed and these areas left and the roads closed without any attempt to return these gully crossings to their original condition. In some instances, tree crowns were left in gullies.

A number of areas marked as 23 - Myrtle Scrub and in fact rainforest had been intruded into by roads and logged. These and other areas marked 53 - Brush Box - had been designated "reserved from logging" in the Harvest Plan.

Designated stream filter strips had been intruded into and even extensively logged. Debris had been bulldozed into at least two separate sections of filter strip.

In many instances habitat trees had been damaged. Marked habitat trees were also often unsuitable as habitat trees, being either inappropriate species or merely malformed trees lacking hollows and commercially unsuitable for logging. In most instances where trees had been marked for retention as future habitat trees, the trees were either excessively young and unlikely to produce hollows for at least a century - if ever - or inappropriate species.

When we first arrived in compartment 368 in early March, we found many diesel spills around a diesel fuel tank at the edge of an incorrectly sited loadump. When work in this dump was completed, the diesel spills were covered up by heaps of soil and the tank moved a hundred metres from its previous location.

We found a broken down bulldozer on a slope of 25 degrees with its gearbox reversed to a pile of debris of oil spills.

This site was also extensively reworked and buried by the bulldozer after its repair.

A major and repeated observation was the inadequacy of maps used by forestry to obtain their base data - the so-called forest type maps. In many cases these completely misrepresented the actual forest present in the coups, and yet logging had proceeded as if these maps were correct. Intrusions into proscribed old growth and rainforest areas were rife.

NO wildlife corridors have been designated for harvest plans within the Mistake S.F.. This is entirely inadequate.

In a number of instances, trees were marked with conflicting symbols to retain AND cut them. In some instances these were failed: in others they were not.

An Aboriginal artefact - a stone dagger - was found in the middle of a closed temporary road. The Commission has stated that its staff will be trained in the recognition of such artefacts - and archaeological sites - before logging would ensue. Has such training been completed? A great many trees in one compartment which were obviously cut and marked by Aboriginal people had a road pushed through its centre. Was this specifically approved? The EIS & FIS claim that no logging on upper slopes will commence without consultation with regional Land Councils. Bowraville Lands Council has not been contacted regarding the operations on the upper slopes in the plan area (p. 14 particularly).

BREACHES. EIS 3.1.1, 3.1.3, 3.11, EIS Determination Report: 3.4

The Harvest Plan claims that approx. 60% of the plan area is over 25 degrees in slope. Yet an analysis of the EIS Slope Classifier Map gives a reading closer to 40%. Which is correct?

Provisions in the Harvest Plan II.13(v) to retain large Blackbutt over 140cm at breast height are apparently useless, as there are virtually no Blackbutt over this diameter in the compartments. It is impossible to gauge whether an extra 10% of Blackbutt trees over 100cm at

4  
breast height have been retained in addition to prescribed habitat trees, but this seems unlikely from observation.

A number of areas in the compartments were observed to be slopes in excess of 35 degrees - yet these areas are not marked as such on the Harvest Plan - nor, for that matter, the E.I.S..

photographs

1a

An example of regular blading off in the Mistake State Forest on a closed off section of road which also has inadequate cross-bank spacing for drainage.

LOCATION:

BREACHES: HP: 3.12, CLP 7.1, 7.5, 7.6, 7.10, EIS: 2.3(a), 5.1.4, 5.2, SEMC: General (ii), 2.1(iv), 2.1(vii), 2.1.1(iii), 2.1.1b(iv), 2.4(ii), 2.4(viii),

"BLADING OFF - The removal of surface soil from a snig track or road in order to expose a drier and/or firmer surface to allow its use by machinery." -

-p 7 Amended Standard Erosion Mitigation Conditions for Logging in NSW, June 1984 - the SEMC used in the EIS for the Mistake forest.

"Blading off" on minor roads and snig tracks is prohibited unless specifically authorised."

7.6 Ford's Code of Logging Practices, used by the Commission in the Mistake.

1b

Blading off through drainage line where Aboriginal artefact (a stone dagger) was found by a three year old child on log track.

LOCATION:

BREACHES: HP: 3.13(iii), CLP: 2.3.1, 7.1, 7.5, 7.6, 7.10, 12.1, EIS: 2.3(d), 5.1.4, 5.11, SEMC: General(ii), 2.1.1(iii), 2.1(iv), 2.1.1b(iv), 2.1.1(vii)

1c, 1d

Grey Gum covered with old and fresh scratches amid stand of similar trees on edge of logging road.

LOCATION:

BREACHES: HP: 3.13(vi), CLP: 2.8.2(?), EIS: 2.3(b), 2.3(d), FIS: 2.4

1e-11

Creek gully within rainforest area (Myrtle Scrub - type 23) marked 'reserved from logging' on harvest plan; repeated roading without rehabilitation through creek.

LOCATION:

BREACHES: HP: 3.3, 1(c), CLP: 7.5, 7.10, EIS: 2.3(a), 2.3(b), 2.3(d), 5.1.1, 5.1.4, 5.3, SEMC: General(ii), General(v), 2.1.1(iii), 2.1.1(vi), 2.3(i), 2.3(v), FIS: 2.4

1m-1q

Large intrusion into inadequately marked filter strip; logging within 20 metres of banks and the pushing of debris into filter strip itself.

LOCATION:

BREACHES: HP: 3.3, 1(c), 3.3, 1(c), CLP: 6.10, 6.11, 7.5, 7.10, EIS: 2.3(a), 2.3(b), 5.1.1, 5.1.2, 5.3, SEMC: General(ii), 2.2, 2.3(i), 2.3(iv), 2.3(v), FIS: 2.4

2A

INCORRECTLY SITED LOGDUMP

This logdump was incorrectly sited directly on Mines Road - a gazetted public road - instead of to the south of it as shown on the Harvest Plan. This both blocked and damaged Mines Road. No topsoil was stored for the refurbishment of this dumpsite.

LOCATION:



BREACHES: HP: 3.3, 1(a), CLP: 7.8, 7.12, 7.14, 9.4, EIS: 2.3(a), 4.2.2, 5.1.4, GEMC: General(ii), 2.5(i), 2.5(ii), 2.5(iii)

2B

This grey gum, in a stand of grey gums right on the edge of logging work, was covered with fresh koala scratches. Grey gum is one of the four trees koalas require for feed.

LOCATION:

BREACHES: HP 3.13(vi), EIS: 2.3(b), 2.3(d), 5.1.3, FIS: 2.4

2C, 2D, 2E

A marked habitat tree, obviously cut down, with this talltale cubic metre of timber left on a closed and banked snigtrack, still bearing the habitat tree 'H'.

LOCATION:

BREACHES: HP 3.3, 1(f), CLP: 6.8, EIS: 2.3(b), 2.3(d), 5.1.2, FIS: 2.4

3a and 3b

DOUBLE-MARKED OLD GROWTH TREE. One of a number of trees confusingly marked for retention AND cutting. Some double marked trees were cut, some were left. Indecision or internal sprayscan warfare between Commission staff and/or contractors?

LOCATION:

BREACHES: HP: 3.14, CLP: 3.7(?), 5.4(?), 6.8, EIS: 2.3(d), 5.1.2, 5.1.4, FIS: 2.4

3c

An example of regular loading left after crossbanks were installed without correct drainage - no table drains and definitely placed off.

LOCATION:

BREACHES: HP: 3.12, CLP: 7.1, 7.5, 7.6, 7.10, EIS: 2.3(a), 5.2, 5.3, GEMC: General(ii), 2.1.1a(iii), 2.1.1b(iv)

3d, 3e, 3f

Area marked 'RESERVED FROM LOGGING' on the harvest plan. In addition to the tracing of this no go area, drainage lines have been crossed without subsequently being restored to their original condition and crowns and debris have been left in waterways.

LOCATION:

BREACHES: HP: 3,

# NORTH EAST FOREST ALLIANCE

## Old Growth Forests

Old growth trees provide numerous benefits to wildlife, not adequately provided by regrowth: tree hollows, abundant flowers, fruits and seeds, stable and high nest sites, large trunks and branches for foraging, and large decomposing logs on the forest floor.

Logging destroys the habitat qualities of old growth forests by changing the age structure of the forest, replacing the old hollow bearing trees with even aged stands of young regrowth trees.

Some 399 (25%) of Australian terrestrial vertebrates need tree hollows. A high proportion of forest vertebrates are 'hollow dependant' including gliders, possums, bats, cockatoos, parrots, lorikeets, rosellas, owls, kingfishers, treecreepers and a large variety of other mammals, birds, reptiles and frogs.

The animals in turn provide numerous benefits to the plants such as: pest control, pollination, dispersal of seeds and fungi and accelerated nutrient cycling. Old growth forest ecosystems are more than the sum of the parts, they involve complex relationships between the individuals and the whole.

DIRECT ACTION SAVES FORESTS

# OHM GAI A DUDES

PEOPLES COMMISSION FOR THE FORESTS



EARTH  
FIRST



# OLD GROWTH FOREST BEING LOGGED NOW!!!

AMBER ALERT!!! 7-7-93

THE LAST SUBTROPICAL COASTAL FORESTS IN AUSTRALIA ARE BEING LOGGED BEYOND RECOGNITION AND RECOVERY NOW - BUT CAN STILL BE SAVED.

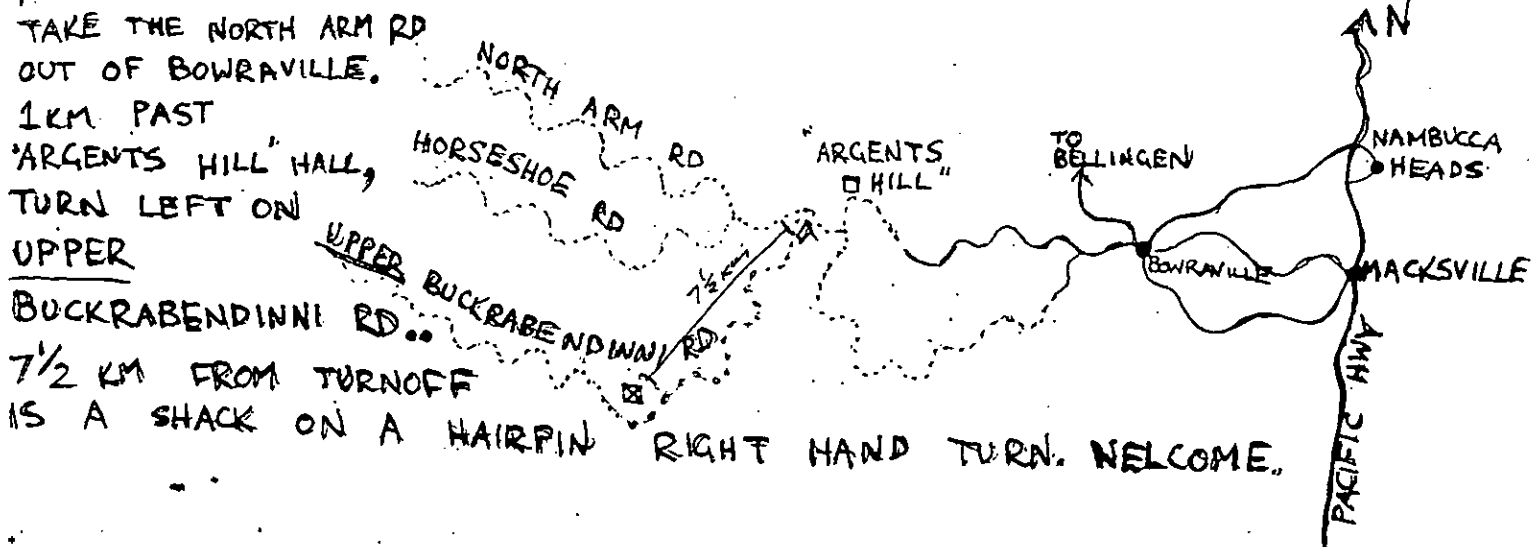
The last forests of this type are in a narrow band on the NSW coast about halfway between Sydney and Brisbane. They are the last intact habitat for dozens of threatened native animal species and pure watersheds for downstream towns and agriculture. They contain sites of great cultural and religious significance for the local Goombanger people and others.

The Mistake Forest in the Nambucca Valley is known to be home to at least 23 threatened animal species and is a rich mosaic of rainforest, Old Growth (unlogged ancient) and regrowth. THOUSANDS of hectares have never been logged, according to the Forestry Commission's own Environmental Impact Statement (EIS). One small 3 hectare area alone has been found by independent survey to contain 95 species of rainforest trees - an incredibly diverse area. These forests are the last untouched forest remnants and seed sources in the entire Nambucca region - and these last tall, rich forests are being trashed now, before it can be reserved with proposals currently underway. The National Parks and Wildlife Service have issued LICENSES TO KILL ENDANGERED SPECIES in the Mistake Forest to the Commission to 'keep the industry going'. The 'industry' has mismanaged itself into an early grave and is fully intent on taking our ecosystem with it. The Commission is logging the last ancient forests in hitherto inaccessible steep mountain country, eroding soils and degrading downstream catchments and only a small group of local farmers and residents stands in their way. Much ancient forest due to be logged in the next few weeks is being trashed under exemption from the need for the Commission to even prepare an E.I.S.

WE NEED YOUR HELP TO SAVE OUR LAST WILD PLACES. OTHERWISE HUNDREDS OF HECTARES OF THE LAST OF OUR HIGH CONSERVATION VALUE FORESTS WILL GO UNDER THE AXE AND BULLDOZER BEFORE THE END OF SEPTEMBER. WE NEED MORE VOLUNTEERS TO HELP US SURVEY THESE ENDANGERED FOREST COMPARTMENTS IN THE NEXT FEW WEEKS - BEFORE THE COMMISSION CAN REACH THEM. THIS INVOLVES WALKING THROUGH BEAUTIFUL FOREST, LEARNING ABOUT IT AND COLLECTING SAMPLES. IT DOES NOT INVOLVE BEING ARRESTED OR OTHERWISE ENDANGERING YOURSELF - BUT IT CAN SAVE THE FOREST, BY HAVING THE RICHEST, MOST DIVERSE SECTIONS RESERVED FOR ALL TIME UNDER A COMPREHENSIVE RESERVE SYSTEM NOW BEING ESTABLISHED BY THE FEDERAL AND STATE GOVERNMENTS. PLEASE HELP!

It's not enough to know that there are people 'out there' working to save everyone's ecosystems, our air and water - because in truth not enough is being done to ensure that our children have an environment at all. We need help and will provide living space and train people in forest and species identification and documentation in friendly, open and peaceful surroundings. Please come and help us save the forests PEACEFULLY - we only have a few weeks (as at the beginning of July) before the axe falls on our heritage. This map leads to a 'private' basecamp surrounded by the Nambucca forests. Or phone (065) 647808 or (065) 647 653 for more info.

PLEASE BRING: Bedding, camping gear, food, any useful equipment, musical instruments, tools etc - but bring yourself if you have none of these. Please copy this sheet and pass it on. WELCOME!



\*\*\*\*\*

## JOHN R. CORKILL

Public Interest Advocate  
Environmental Educator, Planner,  
Policy Adviser

Suite 313 - 375 George St, Sydney. 2001. PhFax 02 299 2541

\*\*\*\*\*

## FAX COVER SHEET

DATE: 19/8/1993

No. of Pages: 3 follow

TO: Mr Ram Ayana and Mistake S.F. Protection Crew  
C/- Nambucca Valley Conservation Assoc. 065 647 808 ph fx

MESSAGE: Following are Computer Folio Searches which you requested on the two Lots adjacent to the proposed logging in Mistake SF compartments. Unfortunately there are no addresses supplied - maybe you'll have to resort to the telephone book, electoral roll or listing of Nambucca Council ratepayers...


Please note the reference to the Crown Lands Consolidation Act 1913 and various sections (e.g. s. 257). While this Act was repealed in 1989, many of the sections or provisions were protected and preserved in the Crown Lands (Continued Tenures) Act, 1989. I'm not sure where copies of these Acts might be available in the Nambucca area - presumably David Leach, Bev van Son's solicitor may have copies or access to same.

If you can't obtain the CL(CT)Act locally, I have a one from which I could copy the various (and I mean various) sections of Schedules which would be relevant to such a 'perpetual lease'. I am unaware what the reference to Memorandum s700000A & C means. May be David Leach knows or could find out.

Presumably further searches are possible to discover, for example, tenancy and shares. Is this necessary? really? Both searches have identified 'Dealings' reference numbers but I know very little about this process having spent only 40 minutes to get this far s'arvo. Each search was the princely sum of \$3.90 = \$7.80! I guess I can carry these costs!

What progress on hard copy of the surveys in the Mistake Area? When might the reserve proposal be ready? NSW Parliament sits again from 7 Septemeber and a Sydney based briefing on this would be a good idea before then (gets very busy later...).

Please note Notice for NSW Forest Summit meeting in Newcastle next weekend 28 August also follows. I'll be there - maybe see ya if you are too!

 Cheers! Ohm Gaia - dudes...!

\*\*\*\*\*  
IF THIS FAX TRANSMISSION IS IMPERFECT, PLEASE PHONE: 02 299 2541  
\*\*\*\*\*

# COMPUTER FOLIO SEARCH

Issued pursuant to the Real Property  
Act, 1990, and certified overleaf

LAND TITLES OFFICE  
NEW SOUTH WALES



No. 76

Search certified to:  
Date 19. 8.1993 Time 8.00AM

TORRENS TITLE  
FOLIO IDENTIFIER

54/755544

EDITION No. & DATE OF CURRENT CERTIFICATE OF TITLE

1

17. 2.1993

## LAND

----

LOT 54 IN DEPOSITED PLAN 755544  
SHIRE OF NAMBUCCA  
PARISH OF HERBORN COUNTY OF RALEIGH  
(FORMERLY KNOWN AS PORTION 54)  
TITLE DIAGRAM: SEE CROWN PLAN 3728.1714

## FIRST SCHEDULE

-----

ESTATE: PERPETUAL LEASEHOLD

SIEGFRED BRAUHART  
MARY CAROLINE BRAUHART  
AS JOINT TENANTS

(T I124299)

## SECOND SCHEDULE

-----

1. LAND EXCLUDES MINERALS AND IS SUBJECT TO RESERVATIONS AND CONDITIONS IN FAVOUR OF THE CROWN - SEE MEMORANDUM S700000C
2. EXCEPTING ANY ROADS AND RESUMED LAND
3. HOMESTEAD FARM 1933/6 BELLINGEN
4. SUBJECT TO THE PROVISIONS OF THE CROWN LANDS CONSOLIDATION ACT, 1913 PARTICULARLY AS REGARDS PAYMENT OF ANNUAL RENT AND OTHER DUES, RESTRICTIONS ON DEALINGS AND RESTRICTIONS ON SUBDIVISION - SEE SECTIONS 257 AND S274

## NOTATIONS

-----

UNREGISTERED DEALINGS: NIL

RGRH

19. 8.1993

76

## COMPUTER FOLIO CERTIFICATE

The Registrar General hereby certifies that at the date and time specified in the statement of the computer folio search on the reverse side hereof —

1. The information shown in that statement (other than information shown under the heading NOTATIONS) had been duly recorded, pursuant to the provisions of the relevant legislation, on the folio of the Register kept pursuant to the Real Property Act, 1900 in respect of the land (or parcel) described in that statement.
2. Where that statement contains FIRST and SECOND SCHEDULES, the person described in the FIRST SCHEDULE thereof was the registered proprietor of an estate in fee simple (or such other estate or interest as is set forth in that schedule) in the land described in that statement, subject to such exceptions, encumbrances, interests and entries as appear in the SECOND SCHEDULE.

Registrar General





# COMPUTER FOLIO SEARCH

Issued pursuant to the Real Property  
Act, 1990, and certified overleaf

LAND TITLES OFFICE  
NEW SOUTH WALES

No. 77

Search certified to:  
Date 19. 8.1993 Time 8.00AM

TORRENS TITLE FOLIO IDENTIFIER	
44/755544	
EDITION No & DATE OF CURRENT CERTIFICATE OF TITLE	
4	21. 1.1993

## LAND

-----  
LOT 44 IN DEPOSITED PLAN 755544  
SHIRE OF NAMBUCCA '  
PARISH OF HERBORN COUNTY OF RALEIGH  
(FORMERLY KNOWN AS PORTION 44)  
TITLE DIAGRAM: SEE CROWN PLAN 3312.1714

## FIRST SCHEDULE

-----  
ESTATE: PERPETUAL LEASEHOLD

D B WELCH, S C KOSSEN, R J FORSHAW, J A FORSHAW, N J PEACOCK, G  
T GRIFFITHS, J TARANTO, J J BUTTERWORTH, T L NESBITT & A C  
NESBITT-FOR TENANCY AND SHARES SEE DEALINGS (T 157849)

## SECOND SCHEDULE

- 1. LAND EXCLUDES MINERALS AND IS SUBJECT TO RESERVATIONS AND  
CONDITIONS IN FAVOUR OF THE CROWN - SEE MEMORANDUM S700000A  
2. EXCEPTING THE ROAD SHOWN IN THE TITLE DIAGRAM  
3. PERPETUAL LEASE GRANT (C.L. 1921/1 BELLINGEN) SUBJECT TO THE  
PROVISIONS OF THE CROWN LANDS CONSOLIDATION ACT, 1913,  
PARTICULARLY AS REGARDS-  
    PAYMENT OF ANNUAL RENT AND OTHER DUES  
    RESTRICTIONS ON DEALINGS, SEE S.272  
    RESTRICTIONS ON SUBDIVISION, SEE S.257  
4. Z240511 MORTGAGE TO WESTPAC BANKING CORPORATION  
    I57842 DISCHARGED AS REGARDS THE INTERESTS OF RODNEY  
        JAMES FORSHAW & JUDITH ANN FORSHAW  
    I57843 DISCHARGED AS REGARDS THE INTERESTS OF NORMAN  
        JOHN PEACOCK, GEOFFREY THOMAS GRIFFITHS, JANINE  
        TARANTO, JEREMY JAMES BUTTERWORTH, TERRENCE  
        LESLIE NESBITT & ANNETTE CHERYL NESBITT

## NOTATIONS

-----  
UNREGISTERED DEALINGS: NIL

RGRH

19. 8.1993 77

## COMPUTER FOLIO CERTIFICATE

The Registrar General hereby certifies that at the date and time specified in the statement of the computer folio search on the reverse side hereof —

1. The information shown in that statement (other than information shown under the heading NOTATIONS) had been duly recorded, pursuant to the provisions of the relevant legislation, on the folio of the Register kept pursuant to the Real Property Act, 1900 in respect of the land (or parcel) described in that statement.
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Registrar General





Phone call  $\frac{1}{2}$  RAM AYANA 6-30 9/8/93

Cpt 363 being surveyed now: Reserve proposal being  
Found Koala scats <sup>all sizes</sup> 'literally 100's' worked up now! gone for analysis . . . .

Red Cedars. 'hugeous' he's seen

Huge Brushbox. Grandina almost as big as WCCk SF  
Ecologists doing proposal have been 'blown out' at what  
4 new end. sp. Animals! they've found  
4 " sp. Flora! add to previous list!  
ditto! Will deliver hard copy soon!

Condition of Alert still RED! definitely want help  
Koori embassy ✓✓✓

re: NEFA: Is Mistake NEFA Dailon + Ned have  
problems  $\frac{1}{2}$  constant 'red alert' status also  
recent alert NOT ACCURATE! Check  $\frac{1}{2}$  Lyn  
re NEFA attitude to 'blockade'  
Is logging happening in Mistake SF in any Cpt?

018 656 289 Mobile.



**NSW  
NATIONAL  
PARKS AND  
WILDLIFE  
SERVICE**

Mr J Corkill  
Vice President  
North Coast Environmental Council Inc  
3 Albert Street  
**FOREST LODGE NSW 2037**

Our reference:  
Your reference:

**18 JUL 1991**

Dear Mr. Corkhill,

I have pleasure in enclosing the Corporate Plan of the NSW National Parks and Wildlife Service, for the period 1991-94.

Like many government agencies, the Service is currently going through a period of re-evaluation and consolidation, and this is reflected in the issues and priorities identified in the plan.

I trust you will find the Corporate Plan both informative and useful.

Yours sincerely,

  
**W. J. GILLOOLY,**  
Director

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



NSW  
NATIONAL  
PARKS AND  
WILDLIFE  
SERVICE

J R Corkill  
1 Oliver Place  
LISMORE NSW 2480

Our reference:  
Your reference:

14 July, 1993

Dear J Corkill

**MISTAKE STATE FOREST -  
FAUNA IMPACT STATEMENT.**

---

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

In accordance with Section 92B(6) of the amended National Parks  
and Wildlife Act, 1974, I will consider the points you have raised  
when making my decision in regard to the above application.

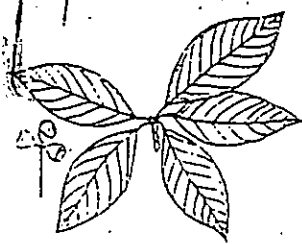
However, as your submission was received after the date specified,  
you do not have rights to appeal my decision in the Land and  
Environment Court.

Yours faithfully

Neil Shepherd  
Director General

---

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



BRUSH BOX  
*Lophosietum confertus*

# N.E.F.A.

## NORTH EAST FOREST ALLIANCE

SYDNEY: NSW Environment Centre, 39 George St, The Rocks, 2000. Ph. 02 2474 206, Fx 02 2475 945  
LISMORE: The Big Scrub Environment Centre Inc, 83A Keen St, Lismore, 2480. Ph 066 213 278, Fx 066 222 676

N.E.F.A. CALLS FOR MISTAKE S.F. E.I.S. TO BE REDONE.

The North East Forest Alliance has accused the Forestry Commission of wasting taxpayers money by preparing yet another E.I.S. that is a "load of waffle, designed to mislead the public", according to spokesperson Dailan Pugh.

The Forestry Commission was forced by a court case, initiated by Trevor Bailey in 1988, to prepare an Environmental Impact Statement for Mistake State Forest, west of Bowraville. The E.I.S. has been on public display for the past month, with the time for submissions closing on Friday (20.9.91).

Mr. Pugh claims that the Commission has ignored a vast body of available information existing on their own files to try and maintain the pretence that their proposed operations will have minimal impact upon the forests.

"For example research conducted by their own researcher in southern N.S.W. found that following logging Greater Glider, Yellow-bellied Glider, Feathertail Glider and Eastern Pygmy Possum were eliminated from areas logged to the intensity proposed in this area."

"It is incredible that in this E.I.S. they are trying to mislead people into believing that their proposed logging will maintain populations of these species at near existing levels when they know it is not true."

"Similarly they are maintaining the pretence that their erosion mitigation conditions are adequate to minimise erosion when they are currently reviewing them precisely because they know they are inadequate." Mr. Pugh said.

Mr. Pugh emphasised that N.E.F.A. is not opposed to logging in Mistake State Forest, per se, but is opposed to this deliberate attempt by the Forestry Commission to mislead the public with waffle they know to be untrue.

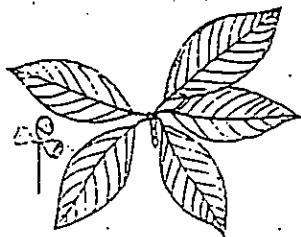
"Where logging is to proceed it must be done in an environmentally acceptable manner. The current free-for-all and transparent attempts to justify it, cannot be allowed to continue." Mr. Pugh said.

The N.E.F.A. submission condemns the E.I.S. on the grounds that;

1. The only attempt made to assess flora and fauna was a brief (couple of days) fieldwork undertaken by a forester some three years ago, thus there has been no proper attempt to assess the natural values of the forest,
2. Site specific work, available to the Commission, was ignored in the preparation of the E.I.S.,
3. Data available to the Commission on the effects of logging and burning on fauna was ignored in the preparation of the E.I.S.,
4. No faunal corridors are provided for and the proposed filter strips are inadequate to provide suitable habitat for fauna or protect streams from degradation,
5. Rainforest is not defined on ecological criteria and are proposed for roading and logging,
6. No adequate measures are proposed to protect the rare and inadequately reserved *Bosistoa floydii*,
7. The 1984 Standard Erosion Mitigation Conditions are relied upon by the Commission to protect soils and streams, even though the Commission is aware that these prescriptions are inadequate,
8. No attempt has yet been made to identify sites of anthropological significance and there is no intention to survey for sites of archaeological significance,
9. and, the E.I.S. is a series of subjective statements that can't be substantiated by scientifically valid facts, it is mostly waffle.

---

For further information contact D. Pugh on 066 439074



BRUSH BOX

*Lophoskemon confertus*

# N.E.F.A.

## NORTH EAST FOREST ALLIANCE

SYDNEY: NSW Environment Centre, 39 George St, The Rocks, 2000. Ph. 02 2474 206, Fx 02 2475 945

LISMORE: The Big Scrub Environment Centre Inc, 88A Keen St, Lismore, 2480. Ph 066 213 278, Fx 066 222 676

MISTAKE STATE FOREST E.I.S.  
SUBMISSION BY THE NORTH EAST FOREST ALLIANCE  
Prepared by D. Pugh

This E.I.S. is an appalling attempt to describe the environment to be affected by the proposed operations and the impact of the proposed operations upon the apparently largely unknown environment. It is disgusting for the Forestry Commission to once again ignore the data that has been collected by its own researchers, and the recommendations that they and other biologists have been making for over a decade. This E.I.S. is yet another sham designed to mislead any person reading it and in no way can be construed to be a valid scientific document, or to fulfil the aims and intentions of the Environmental Planning and Assessment Act.

While it is apparent that the supposed watchdogs on E.I.S.'s, the Department of Planning, will not ensure that this E.I.S. is brought up to even minimally adequate standards (as evidenced by their refusal to act on the "mini" E.I.S. for Chaelundi) the environment movement will not condone the Forestry Commission's continued abrogation of their responsibility to protect environmental values or to take adequate steps to protect such values.

This E.I.S., as with previous ones, is riddled with inconsistencies and errors. As from previous experience the Commission will ignore any in depth appraisal of these, this submission instead focusses on some of the major inadequacies, particularly as regards fauna. It must be noted that the author has read numerous Commission files and is well versed with the state of knowledge within the Commission, and the virtual absence of any attempt to study the forests of northern N.S.W. - despite its being one of the most biologically diverse parts of Australia.

The Commission may delude itself into thinking that such superficial drivel and the Department of Planning will enable it to continue to produce shoddy E.I.S.'s to cover up its mismanagement of the public's forests but it will be rudely

awakened to the fact that they are now accountable to a better informed public.

It is evident that this E.I.S. is inadequate because;

1. The only attempt made to assess flora and fauna was a brief (couple of days) fieldwork undertaken by Binns some three years ago, thus there has been no proper attempt to assess the natural values of the forest,
2. Site specific work, available to the Commission, was ignored in the preparation of the E.I.S. (e.g. work by Milledge and Magarity),
3. Data available to the Commission on the effects of logging and burning on fauna was ignored in the preparation of the E.I.S.,
4. No faunal corridors are provided for and the proposed filter strips are inadequate to provide suitable habitat for fauna or protect streams from degradation,
5. Rainforest is not defined on ecological criteria and are proposed for roading and logging,
6. No adequate measures are proposed to protect the rare and inadequately reserved *Bosistoa floydii*,
7. The 1984 Standard Erosion Mitigation Conditions are relied upon by the Commission to protect soils and streams, even though the Commission is aware that these prescriptions are inadequate,
8. No attempt has yet been made to identify sites of anthropological significance and there is no intention to survey for sites of archaeological significance,
9. and, the E.I.S. is a series of subjective statements that can't be substantiated by scientifically valid facts, it is mostly waffle.

There only alternative that should be considered at this time is throwing this E.I.S. in the garbage bin, despite its pretty pictures, as there is no doubt it is rubbish. A valid E.I.S. must then be prepared and presented for public consideration in accordance with the law. The approach of doing additional studies and then determining this E.I.S. is unacceptable as this attempt is so shoddy it can't be patched up and there is no opportunity for public consideration of the area on its merits.

#### FAUNA

Yet again the Commission has excelled itself in attempting to ignore and downplay the faunal values of the area. Why was there no attempt to undertake a proper systematic survey of the fauna of Mistake State Forest, identify all species likely to be adversely affected and formulate adequate measures to mitigate impacts? (It is evident that the answer to this is that the Commission doesn't want to know about or

admit the effect their operations are having on the long term viability of some fauna groups).

Why was only a couple of days spent assessing both the floral and faunal values of the area by Binns, some three years ago, and no further attempt made to assess wildlife for the E.I.S.? Surely the Commission must be aware that this is entirely inadequate. Aside from failing to make any attempt to assess insectivorous bats it is apparent that the species lists in Appendix 7 are incomplete and do not represent the true diversity of the forest.

The E.I.S. (p.42) admits that arboreal mammals are sensitive to logging operations due to the loss of hollows for denning and nesting. No mention is made of the effects on the numerous bats, birds, reptiles and amphibians that also rely on tree hollows. Why not?

The reported findings of Binns that population densities of arboreal marsupials were similar in both recently logged, unlogged and older logged areas is an absurd generalisation. As no methodology is described it is impossible to ascertain how he obtained such an apparently farcical result. The Commission should be well aware that examination of forests in southern N.S.W. both pre and post logging by their own wildlife researcher, R. Kavanagh, proved that logging has a very significant effect, e.g.;

*"There is little doubt that none of the larger gliders (Greater Gliders and Yellow-bellied Gliders) persisted in the logged areas of the 10% and 25% canopy retention treatments."*

*"No studies have found Feathertail Glider in forests which have been heavily logged."*

*"...Eastern Pygmy Possums were captured...all in unlogged forest."*

Over a decade ago, another Commission wildlife researcher, W. Rohan-Jones, noted;

*"Though selective logging should, theoretically, retain some Gliders, this does not appear to be the case in the foothills at Narooma. Gliders survive, at best in the short-term post logging, in adjacent unlogged habitat of suitable type but the densities are considered low."*

Now that these documents are public the Commission must forgo their misrepresentations of fact and publically admit the horrendous impacts their operations are having. Continued public misinformation will not be tolerated, particularly in an E.I.S. which is meant to contain all relevant information, and not be yet another glossy public relations exercise.

Mackowski's 1984 paper is relied upon to determine the



minimum number of habitat trees required to maintain populations of arboreal mammals "at existing levels". As is evidenced by the south-east forests the Commission is well aware of the necessity of undertaking specific surveys, based on forest types, to determine the specific population densities of arboreal marsupials in order to estimate an adequate habitat tree retention prescription. In the south-east the prescription recommended by Kavanagh on better quality sites was 10 habitat trees per hectare. Why was no survey done in Mistake to firstly determine the carrying capacity of the various forest types and then estimate tree retention prescriptions? In the absence of valid surveys the Commission can not be considered to be taking realistic measures to retain populations of arboreal mammals, and can certainly make no claim that the proposed retention rate "would assist to maintain the populations at existing levels".

Mention is made of management to maintain a minimum number of habitat trees, yet no mention is made of a prescription to maintain such trees in perpetuity. In the forest type Mackowski studied he concluded that there was a necessity to retain 45% of each hectare unlogged in order to provide adequate replacement habitat trees in perpetuity. There is clearly no intention to do this in Mistake. It is evident that the grossly inadequate prescriptions alluded to in the E.I.S. will lead to an hiatus in habitat trees as those retained are blown over, burnt out or otherwise killed before replacements are available- inevitably leading to a further population crash. Why was no mention made of this aspect of Mackowski's work, if not to deliberately mislead the public yet again?

The claim is also made that "the large pool of relatively undisturbed habitat in filter strips, rainforest, and steep or non-productive hardwood forests" will "act to ameliorate the impact of local habitat changes on wildlife" (p.41). Yet again the Commission is deliberately ignoring the advice of its own researchers;

In 1985 the Eden Regional Forester noted;  
*"[Kavanagh's] recommendation....was used as an easy way to seperate the flatter topography with high populations from the steeper topography with few or no arboreal mammals..."*

Shields and Kavanagh (1985, Technical Paper 32) note;  
*"In the past, reservation of suitable habitat has been incorporated with existing management prescriptions (stream side protection, slope protection) to maintain an interconnected series of reserves. However, the preferred habitats of many species do not include narrow riparian strips or steep unloggable country. Consequently, it is often necessary to take other measures to reserve suitable areas of preferred*

*habitats to ensure conservation of some species."*

Research by Commission staff, and others, on the north coast has substantiated that arboreal mammals prefer more moderate slopes. The author's observations are that a variety of other species also display similar preferences, being absent or in very low numbers on steeper slopes. For the Commission to continue to pretend that this is not the case is reprehensible- it is about time that the Commission stopped perpetuating this myth.

This situation is further exasperated on the north coast, as the Commission is similarly well aware, by the tendency for rainforest to predominate in filter strip localities- thereby providing little habitat for non-rainforest species.

It is also incredulous that the Commission persists with 20 metre strips along major streams, which are allowed to be logged, as their filter strips (there is no apparent intention to allow for wildlife corridors). In the south east these strips are generally 100 metres wide (with extensions to include important wildlife habitat) and not subject to logging. Given the greater importance of the north east's forests to wildlife it is to say the least inconsistent that filter strips are not on at least a par with the south east. Why is this so?

Mention is made of unconfirmed sightings of Rufous Scrub Bird, Parma Wallaby, Tiger Quoll and Brush-tailed Phascogale, yet the Commission made no attempt to conduct a proper survey to determine the presence or absence of these species, why not? And what about other endangered fauna (yes, despite the claims in the E.I.S. all species listed on Schedule 12 are under the heading of "Endangered Fauna") that may be present- Koala, Feathertail Glider, Eastern Pygmy Possum, Large-footed Myotis, Dome-headed Bat, Sooty Owl, Masked Owl, Powerful Owl, etc.- why was no attempt made to survey for these species or develop management strategies for them? Ignorance or sheer bloody-mindedness?

The pretence that because of the Commission's ignorance of the impact of its operations on fauna there is no need for concern would be laughable were not the consequences so serious. No attempt has been made to properly delineate species sensitive to forestry operations, of which many occur in Mistake S.F. The Commission is aware of the "Report to DORC from RWG 12, 1987" as it is on the Commission's files and was co-authored by R. Kavanagh, it must also be aware that a number of the species occurring in Mistake are on that list, and yet no attempt was made to identify such species in the E.I.S. Why not? Simply pretending ignorance is no excuse.

The Commission's intentioned ignorance is displayed by the

claims that the Wompoo Pigeon "feeds primarily on the seeds of rainforest trees and would be little affected by logging in hardwood forest types" It is in fact a frugivorous species (i.e. it eats fruits not seeds) that the author has observed to often feed on rainforest species under a eucalypt or Brush Box overstorey- particularly in the colder months when fruit of species more common in these forest types, such as White Cedar and Pencil Cedar, are important and necessary food sources.

Similarly the Commission's implications that Spagnum Frogs would not be adversely affected is unsubstantiated. In fact as it is found in stream heads it can be expected to be significantly impacted by altered hydrological regimes caused by machinery disturbance affecting water movement and the increased transpiration of regrowth (reducing the availability of water).

It is good to see the Commission admitting that roads facilitate the ingress of introduced predators (their amnesia stops them from remembering this when it doesn't suit their purpose), though (true to form) the Commission is trying to pretend that it is only "major" roads that have this effect. Minor roads and snig tracks will also have this effect. So called short-term roads and tracks will remain open for many years before regeneration will progress sufficiently to hinder the dispersal of introduced predators (unlike water they are not diverted by cross-banks). This may well be long enough to eliminate local populations of some species. The Commission has the ability to close roads where their impact is unacceptable. The Commission has a responsibility to consider this impact fully so that the ramifications can be identified and mitigation measures devised. Dismissing an identified impact out of hand is not acceptable.

Despite there being a large body of research (some of which the Commission is aware of) on the impacts of fire on fauna the Commission has chosen to completely ignore the impact of their proposed fire frequencies on fauna and the habitat components they rely upon. This 'bury your head in the sand' approach is not good enough.

The North East Forest Alliance has made a number of submissions to proposed E.I.S.'s outlining some of the groups of species sensitive to forestry operations. The Commission has no excuse to now ignore these species and impacts in E.I.S.'s. There should be no need for us to reiterate them time and time again!

## FLORA

The Commission has again abrogated its responsibility to properly assess the environment it intends to alter by only conducting what it describes as a survey with a "low sampling intensity" that generated "limited data". Presumably this survey only lasted a couple of days, with only part of the time spent assessing flora and only covered a fraction of Mistake. There is no mention of the nature or duration of this unpublished survey so a proper assessment can not be made.

The Commission's definition of rainforest is not in line with current ecological thinking and is purely used to exclude the maximum volume of timber possible so that the Commission can continue its pogrom of rainforests. The Commission is aware of the Ecological Society of Australia's definition and thus has the responsibility to canvas this issue in the E.I.S. A so called definition that excludes stands with Brush Box and eucalypt emergents has no ecological validity.

The Commission's intent to construct tracks through what it terms rainforest and remove "hardwood trees from rainforest edges" is not acceptable. Such disturbances will have long term consequences for the rainforests. It will increase their vulnerability to fire incursions (either as escapees from burning operations or wildfires fuelled by debris remaining from logging operations) and weed invasion (lantana being a problematic species of particular concern).

Compartment 365 is an example of an area that would seem to be predominately rainforest by any ecological definition, the roading and logging of which will involve substantial damage to the rainforest. The only products proposed for removal are veneer logs, mining timber, pulpwood and rainforest logs- with the exception of rainforest logs all other products are obtainable from regrowth forests of which there are no shortage on the north coast. It is assumed that as no quota logs are proposed for removal that most of the so called hardwood stands have already been logged. It would seem that the best option for this compartment, due to the environmental consequences of doing it over again, is to leave it alone and obtain the proposed products elsewhere.

The species *Bosistoa floydii* is of particular concern and particularly threatened by the proposed operations, due to its preference for ecotones which the Commission admits will be adversely impacted by the proposed operations. There is no foundation to the assertion that "it is unlikely to be affected by the proposed operations".

The logging history map (3) notes that the map "indicates periods of logging in rainforest types, however such

operations have been proscribed for over a decade..." and the E.I.S. both claims that Binns found *Bosistoa floydii* in logged areas (p.40) and that all "rainforest" is "undisturbed" (Table 5). Pardon the author's confusion but what is the true situation? Apparently rainforests have been subject to logging, but did Binns find *B. floydii* in logged "hardwood forests" or "rainforests", and were those he found survivors from the logging or regeneration?

If its not too much to ask could the Commission ensure that when they redo this E.I.S. that they not only make it more thorough and consistent but that they also include all unpublished reports and data they refer to so that any reasonable person can at least check the sources and reliability of the Commission's often eroneous conclusions.

The logging history map (map 3) makes no attempt to show where the 1 800 hectares of forest dominated by mature and "overmature" trees (scheduled for logging) are, though as their area has been assessed pressumably they have also been mapped. To properly inform the public this information should have been presented in map form. Map 3 is virtually useless for understanding the condition of the forest. For example Compartment 336 is described as having experienced little logging and yet is shown on the map to have been logged 1950-60, 1960-67, 1967-87 and 1987-89, pressumably a few hectares has been repeatedly flogged. When the E.I.S. is redone it must include a detailed map delineating these 1 800 hectares.

Regarding the species composition of logged forests compared to unlogged forests, much is made of the fact that Binns found that 16% of species found in unlogged forests were not found in logged forests. Contrary to what is claimed (p. 39), surely as the number of samples is increased so too will the number of species found in unlogged stands- what justification has the Commission for claiming that the "proportion of species common to both logged and unlogged areas will also increase"? None?

Pressumably as Binns only conducted one such survey this is the same one refered to in the Chaelundi E.I.S., which was apparently restricted to forest type 47 (please correct me if I am wrong, but its rather difficult to know what is going on in these unpublished reports). What about the other forest types, don't they too rate consideration? Also why is no mention made of the fact that Binns (Chaelundi E.I.S.) notes;

*"Vascular epiphyte species are more numerous in unlogged areas, very few species occuring in logged areas."*

*"However, changes in size class distribution and major changes in relative abundance may occur, particularly on a small scale, and heavily disturbed areas may be*

*locally dominated by a single or few species. 10 yr post logging the invasives represent up to 30% of the strata in which they are most abundant. Their abundance has decreased by 30 yr post logging, although still higher than levels in unlogged stands."*

It is apparent that the Commission has problems with selective amnesia but it is hard to fathom how they can conclude that Binns admittedly limited data shows that "continued logging would have a negligible effect on overall floristic composition of vegetation, with no species likely to suffer serious population declines" (p.39). Particularly as there has been no attempt to assess the compounding effects of the proposed recurrent logging at 10 to 40 year intervals. It is imperative that a proper assessment of the impacts of the proposed logging be undertaken, this time covering all forest types and taking into account the compounding effects of future operations. The available information shows that a significant percentage of species will be eliminated by even a single logging- species will "suffer serious population declines".

Invasion and dominance by Lantana is evidently a major problem in Mistake State Forest, as it is elsewhere on the north coast. There has been no attempt to properly assess its impact in Mistake, and while the Commission may claim that there "is no evidence that Lantana is actively spreading" (p.40), presumably there is no evidence that it is not actively spreading either (its amazing how the Commission can turn ignorance into a virtue). Contrary to this claim Lantana has been noted to still be actively spreading as a direct consequence of forestry activities in many north coast forests, and with the proposed opening up of some further 1 800 hectares of "mature/overmature" forest in Mistake and continued disturbance to already infested areas there is every reason to expect Lantana to continue spreading in this area also. Lantana, and its consequences for flora and fauna, is a major problem and thus must be properly assessed and not dismissed with some more meaningless drivel.

The impacts of fire frequency on flora requires proper assessment, not another vague meaningless rave with no scientific validity. It is obvious that the Commission has no idea what the natural fire frequency was for Mistake before they started to mismanage it and that they made no attempt whatsoever to undertake surveys to assess the impact of the regimes they imposed in the past and intend to impose in the future.

## SOILS AND EROSION

It is amazing that the Commission can pretend that their 1984 Standard Erosion Mitigation Conditions (S.E.M.C.) are adequate to overcome erosion problems resultant from logging in northern N.S.W. What about the revised 1990 S.E.M.C., inadequate as they may be the Commission seems to have forgotten about them. The Commission is well aware that the S.E.M.C. (1984 and 1990 versions) are inadequate and are currently reviewing them. In light of this how can the Commission maintain the pretence that they are adequate?

It is evident that the construction of roads and tracks on steep slopes in Mistake has caused significant slumping and landslips. Logging also contributes to this by killing the large trees whose extensive root systems bind the soil together (it may take some years for these roots to decay and the ramifications of this impact to become apparent). Despite this the Commission is blindly pushing ahead with intent to road and log steep slopes. There has been no adequate assessment of the effect of past practices on these slopes. McGarity undertook work in Mistake and found this to be an issue of major concern, why did the Commission make no mention of his work when they have copies of it? When they redo the E.I.S. could they not forget to include it? Repressing relevant information is not acceptable.

Examination of the Harvesting Plan for Compartment 365 shows that access to proposed logging areas in the head of Purgatory Creek will involve the construction of tracks from the proposed dumps through "hardwood" areas "reserved from logging" (presumably because they are on slopes in excess of 35 degrees) and rainforest. It would appear that virtually this whole compartment should be reserved from logging to avoid unexceptable environmental degradation.

The Commission makes much of the brief report prepared by Cornish (Appendix 8), is it true that logging in that area didn't extend onto slopes in excess of 20 degrees in the relevant catchments? If it is then it is apparent that his results can not be extrapolated to slopes from 20-35 degrees in Mistake. These steep slopes are of most concern for both erosion and stability reasons.

The Commission makes no mention of the persistance of silt in streams and its consequences for aquatic fauna. The filling of interstitial spaces in streambeds can persist for many years and have major impacts on most aquatic fauna. These consequences must be assessed.

No attempt was made to asses the loss of nutrients resultant from the proposed operations (via erosion, fire and timber removal) and the consequences of this on the ecosystem. This can be very significant and must be assessed. Nutrient

budgets must be prepared.

## LANDSCAPE

Logging does (not "may") have a significant impact on visual values of the forest, pretending otherwise is nonsense. These gross alterations will persist until the forest is returned to its original structure, something which the Commission has no intention of allowing to occur- it is intended to repeatedly disturb the forest to stop this happening. The Commission, if it was being honest, should admit that in the absence of further gross alteration it will take hundreds of years for the unlogged stands to return to something like their present visual state.

## ARCHAEOLOGICAL AND ANTHROPOLOGICAL VALUES

The Commission makes vague reference to reported sites of significance to Aboriginal people, but in all the years they have been stuffing up the forest have apparently made no attempt to accurately locate and protect such sites. At least this should have been done for this E.I.S. It is apparent that there is no intention to bother looking for sites of archaeological importance (which may be unknown to living people). This is simply another abrogation of their responsibility, and is clearly not good enough.

## ALTERNATIVES

This section is yet another farcical exercise. A more acceptable alternative is;

1. Develop S.E.M.C.'s pertinent to the north coast and sufficient to stop further environmental degradation while restricting all logging to slopes less than 20 degrees,
2. Undertake surveys to identify all wildlife sensitive to the proposed operations and develop mitigation measures to ensure the survival of adequate populations throughout Mistake,
3. Undertake surveys to locate all rare and endangered species and develop strategies and practices to protect all individuals,
4. Accept the Ecological Society's definition of rainforest and restrict all logging and roading to non-rainforest,
5. Liaise with relevant Aboriginies to identify and protect all known sites, while undertaking systematic surveys to locate and protect other sites of archaeological importance,
6. Increase royalties to cover all management costs,



full environmental assessment and provide a return to the Government for the use of the public's forests.

Mistake State Forest is not a forest that, on the basis of available information, the North East Forest Alliance would recommend for addition to the National Parks system. Though there is an obvious need to reserve parts of the forest to protect identified values (e.g. *Bosistoa floydii*, rainforest) and to undertake further surveys to identify other localities requiring protection (e.g. specific habitats of rare and endangered species).

It is accepted that the balance of the forest may be managed for timber production, provided that it is also managed to maintain the natural species diversity and viable populations of both flora and fauna in perpetuity.

nificant to the survival of that species. Yet even by this ridiculous standard the Commission FIS *admits* that most of the above species will be significantly effected in the short to medium term, after which recovery *should* ensue. The FIS repeatedly states that recovery of these species "should" ensue in the "long term" - after some years - with little or no evidence to back up these assumptions.

They claim these effects will be regionally minimal - yet they're saying the same for all the northern forests which surround the Mistake, most of which have already been decimated. Increasing isolation of these last small pockets of prime habitat - with virtually no true wildlife corridors linking them - mean that it's possible some of these species are already effectively extinct in the area and nation, as their gene pools may have already been irrevocably thinned. Any more logging of these prime habitats will ensure that we will be the last generation to know them.

## "Direct Mortality"

Following are some quotes from the Commission's FIS - remember, all these animals are listed as rare, endangered species on Schedule 12 of the Timber Industry (Interim Protection) Act, and a "significant" effect means the outright loss (death) of more than 30%:

\* Koala - "proposed logging operations would have a significant effect only if a large number of food trees were removed. After the initial disturbance it is *likely* that koalas will continue to exploit the remaining habitat... the total effect may be significant in the medium term (up to 5 years)." (p. 17) The koala's prime food trees are specific eucalypt hardwoods targeted for removal by the commission - Blackbutt, Tallowood, Grey Gum and Sydney Blue Gum. The retention of rare stands of grey gum is therefore particularly important.

\* Long-nosed Potoroo - "...habitat will be destroyed during logging or control burning operations. The effect could be *significantly negative* in the short term (up to 2 years) after which recovery *should* ensue." (p. 15)

\* Yellow-bellied Glider - "...the proposed operation could *significantly effect* this species by reducing the tree species diversity required to supply the necessary food requirements... Logging could also significantly effect this species by removing trees which are utilised as den sites." (p. 14)

\* Rufous Scrub-bird - "...logging in eucalypt forest where Rufous Scrub-birds have territories may be detrimental..." (p. 11)

\* Sooty Owl - "This modification would reduce the number of potential roosting and nesting trees and cause some depletion of the food resource. At present the effect on this species in the Mistake S.F. is not fully known... impact may be significant in the medium term (6 months to 5 years)." (p. 9)

\* Glossy-black Cockatoo - "At present there are no measures aimed directly at ameliorating the impacts of this proposal on the Glossy Black-cockatoo... Impact on the population in the Mistake S.F. may be significant in the medium term (6 months to 5 years)." (p. 8)

\* Carpet & Diamond Pythons - "...this will possibly lead to a loss of a small number of individuals... *via direct mortality*. The population as a whole, however, *should* survive... impact may be significant in the short term." (p. 7)

\* "Two aspects of habitat which would be considered critical will be reduced during the proposed operation. They are the number of hollows available to hollow dependent fauna

[gliders, cockatoos and many others] and the amount of canopy cover. The number of hollows available in those areas which are logged could be reduced for as long as 150 years." (p. 26)

\* "Due to lack of before and after data on populations, the *ultimate effect remains unknown* for some species."

- our italics & brackets. The list of quotes goes on and on. You can get your own copy from the Forestry Commission.

No expert claims to know if these animals will survive - yet the Forestry Commission, in charge of a vast amount of our land, acts as if the two century old party will go on forever. Their own internal reports show that they haven't even been able to maintain sufficient numbers of certain eucalypt trees, with many areas having lost their soil and returned to bedrock - let alone maintained the diversity of life in a nation which has already lost more mammal species than any other.

"There are no recovery plans currently being considered by the Forestry Commission of NSW for any of the Schedule 12 species found or expected to be found in the Mistake S.F." (p. 27) There are *no* contingency plans in case recovery of species after "short-term significant impact" *does not* "ensue".

## Aboriginal Heritage

At least one Aboriginal tribe confirms that they have sites of significance within the Mistake State Forest. Many of their sacred sites have already been disturbed or destroyed. The Forestry Commission MUST record these sites and leave them undisturbed, but has recently (late in 1992) desecrated sites on the North Coast which *had* been reported to them.

"Logging of the upper slopes would only be undertaken after consultation with local Aboriginal Land Councils... future work on Mistake SF will be done in conjunction with Aboriginal Land Councils. Further investigations will be undertaken to locate the suspected Bora Ring and to determine the need for further surveys. As requested by the NPWS, a more explicit management prescription will be formulated for sites 'known to exist, or projected to exist, within the forest'." These requirements have not been fulfilled, yet logging is currently continuing on the upper slopes.

"Bowraville Local Aboriginal Land Council would be provided with detailed maps of areas proposed for future harvesting to encourage and facilitate field investigations." The Commission began logging without providing these maps.

The Forestry Commission can review their own EIS of the Mistake S.F. to determine its adequacy themselves, unlike almost all other NSW forests, which fall under the relatively recent Timber Industry (Interim Protection) Act and must be reviewed for adequacy by the Department of Planning. (Att. 2) It's a mistake to give children the key to the lolly shop.

1. Mistake State Forest EIS Report & Determination, August 1992, p4
2. Ibid, p17
3. All figures from the above report and Mistake S.F. EIS, July 1991
4. Ibid, p 18
5. Ibid, p 16 & Attachment 1/13
6. Ibid, p 18
7. Ibid, pp 10-13, & Attachment 1/14
8. Ibid, p 12
9. Ibid, p 19
10. Ibid, Attachment 3, Fauna Impact Statement, p. 2.
11. Ibid, Attachment 3
12. Ibid, Attachment 3, pp 3-25
13. Ibid, Attachment 3, p 4
14. Ibid, Attachment 3, numerous references.
15. Ibid, p. 21
16. EIS, p. 45

THIS PUBLICATION IS GRACIOUSLY SPONSORED BY THE ROYAL SOCIETY FOR THE PROTECTION OF FORESTS - THE ROYAL FAMILY OF OZ ARE THE LAST GLORIOUS CROWNING TREES OF THE DEEP FORESTS.

Wild and  
FREE

# BIG TIMES

ISSUE 7a January 1993

## LICENSED FOR GENOCIDE

Rare endangered animals are being wilfully destroyed by the State Forestry Commission. The Commission has asked for a LICENCE TO KILL, TAKE, AND DESTROY THE HABITAT OF ENDANGERED SPECIES in yet another forest - and chances are the National Parks and Wildlife Service will give it to them unless you help stop them. Yes, National Parks & Wildlife grant licenses to kill endangered species.

As waves of change sweep through the world the last isolated 'survival bunkers' of our endangered native animals are being torn to pieces. Power ploys of brain dead public servants and private vultures skulking over the corpse of our natural heritage are decimating our environment and destroying the lives of our children.

We aren't even making any money out of it. Graft and waste are driving our nation into irreparable poverty by destroying our one true resource base - the diversity of life itself - while driving our dollars further offshore. Our native forests are NOT being replanted. Many of them CAN NOT be. Once the old growth forests are cleared and the sun strikes the earth, they lose their balance and fall into a drier, impoverished state. Our once fertile land is becoming rocky hills and salty plains.

The fall of the forests is the downfall of humans. Our water, air, soil and very lives depend on these planetary creation centres and filtering systems. Very few of these ancient dreaming ecosystems still survive intact in this State. Less than 3% of our land is still relatively intact. Many of the animals which lived here are gone. Many more are going forever, not in this generation or decade but right now. The tiny pockets of surviving marsupials, reptiles and amphibians are NOW being cut off from one another so that with their gene pools depleted, these animals are effectively extinct NOW, THIS YEAR - unless YOU help save them. The forests of Eastern Australia have been under siege for two centuries. The time has come to cease logging in the few remaining Old Growth forests and suspected homes of endangered species and start replanting now - while we can. Talk of 'greenies

costing jobs' is obvious propaganda perpetrated by the resource destroyers. Their dreams are as barren as the landscapes they leave in their wake - yet their children wake in wonder to each magical day. They will never know what they have lost - and you will never know what it is you're helping to save unless you find some time to enter the wilderness while you still have a chance. Learn the difference between trees and a forest, truth and falsehood, nature and greed.

**Don't believe the government, industry or Greens. COME SEE FOR YOURSELF!**

THE FORESTRY COMMISSION IS LOGGING NOW IN THE MISTAKE STATE FOREST IN NORTHERN NSW. THEY HAVE APPLIED FOR A LICENSE TO KILL, TAKE AND DESTROY THE HABITAT OF ENDANGERED SPECIES THEREIN FROM NATIONAL PARKS & WILDLIFE. YOU HAVE ONLY UNTIL FEBRUARY 9TH TO WRITE TO THE NPWS AND LODGE A COMPLAINT AGAINST THIS FIS AND THEIR GRANTING OF A LICENSE TO KILL TO THE FORESTRY COMMISSION. PLEASE WRITE NOW. WRITE TO: ATTENTION - MANAGER OF THE ENDANGERED SPECIES UNIT, NPWS, PO BOX 1967 HURSTVILLE NSW 2220. FOR MORE INFO ON HOW YOU CAN HELP, PHONE THE NAMBUCCA CONSERVATION ASSOCIATION (065) 647703 OR THE BELLINGEN ENVIRONMENT CENTRE (066) 552599. SEND DONATIONS WHICH WILL DIRECTLY HELP THE PROTECTION OF THE FORESTS TO - THE OLD GROWTH SURVIVAL FUND, C/- THE BELLINGEN ENVIRONMENT CENTRE, PO BOX 152 BELLINGEN 2454



# All we are saying: give life a chance

The forest industry is beginning its last long hot summer of destruction before they've nothing left to kill. Like miners approaching the end of a seam of gold, they don't want to stop until they've wrung the last dollar from the old growth forests.

Almost a decade ago greens and politicians stopped the grim reapers destroying the last remaining vestiges of rainforest in the State. In a few centuries these ecosystems may recover. Now we have to save the last traces of 'old growth forests' - the only undisturbed refuges of Australia's more interesting native animals and plants. These ancient, millennial trees are only a small fraction of our decimated forests. We can stop carving up these few areas now with minimal disruption to an industry which claims to be involved in sustainable development - an industry which calls two thousand year old trees 'overmature' and fit only for turning to pulp.

The Forestry Commission is slashing our heritage to chopsticks without caring what they're destroying. Vaguely attempting to satisfy the letter of the Law they throw millions of dollars of our money into self-serving wastes of paper - glossy so-called Environmental Impact Statements (EISs) which have become a source of revenue to pseudo-scientists who must toe the line or be out of a job.

Even when they discover truly endangered species living in a forest, the loggers can still destroy them and their homes. They can even kill rare, endangered animals that you and your children are never likely to see in the wild or anywhere else. All they need is a Licence to Kill, Take and Destroy the Habitat of Endangered Species - which is almost automatically given them on request by the National Parks and Wildlife Service (NPWS).

Yes, you read that correctly. A License to Kill Endangered Species. They're actually doing it. They're also issued with Licenses to Pollute. And in practice the Forestry Commission can do whatever it likes, hemmed in only by toothless tiger committees and commissions whose regulations - designed to save our air and water - they regularly ignore. When members of the public protest, the Commission is empowered to close the forests to everyone - even the media in this free country - and cut the forests under martial law. In one small forest - Wild Cattle Creek - the bill for police enforcement over a few weeks was \$160,000 during last year's protests their (police figures). The only people making any money out of all this is one transnational corporation known as BORAL - whose tentacles permeate government, education and a corrupt public service - after buying out or controlling almost all the mills in the north of the State and many industries across the nation.

## It's A Mistake

This is happening in our forest and mountain heartland now. New technology and a battered economy mean that the last wild places available to industry are being trashed this season. Temporary moratoriums which were saving these old places have just run out across the State. Take the Mistake State Forest for example - before the Commission does.

The Mistake is about 10,000 hectares of mixed forest - an interlaced mosaic of rainforest, old growth and recovering woodlots. At least 19 endangered animal species are known to still live in the Mistake S.F. - although this writer has personally seen half a dozen more than those described by Commission-funded experts. "The flora and fauna surveys that were conducted are not definitive," says the assessment report on the Mistake EIS. "To achieve this level of investigation would be more costly than the net value of short-term forest production (ie 5 years)."

"The investigations are not equal to the types of survey being carried out for management area EISs".

In private conversations with fauna experts actually conducting the fauna surveys, it was admitted to this writer that the surveys were totally inadequate - the 'experts' were drawn from different areas of the State and have no familiarity with the local ecosystems. They stated that a comprehensive survey would take three years - not the three days allowed them.

Parts of the Mistake have been trashed for a century or more while some areas remain in pristine condition. According to the Forestry Commission, about 2,140 hectares are 'old growth'. About 1,800 ha of this 'mature/overmature' old growth is available for logging - the rest is too steep to drive a bulldozer on and almost impossible to walk on, or this would be 'available' as well. About 1,025 ha is previously unlogged virgin 'hardwood' forest. This is interlaced with less than 800 ha of remaining rainforest and in most areas it is impossible to access the 'unlogged hardwoods' without trashing tracts of rainforest to reach them - despite the fact it's illegal to cut or damage rainforest. "Such intrusion is inevitable as ribbons of rainforest traverse the contours along creeks which any system of roads or tracks must cross in steep country... Similarly the immediate edges of hardwood forest types adjacent to rainforest will be logged..."

The Commission classes massive canopy trees as 'overmature'.

The NPWS "expressed concern for the conservation of old growth forests" in the Mistake. They stated that forest dominated by Brush Box should not be logged as it contains numerous rainforest species and

pointed out the low numbers of surviving Grey Gum, Grey Ironbark and White Mahogany trees due to the destruction of this forest type in the entire region by the Commission. The Commission decided to ignore the NPWS recommendations regarding retention of old growth and Brush Box forest; they state that Brush Box trees with a rainforest understory can't be classed as rainforest.

The Commission has decided that they may 'harvest' trees and construct logging tracks on slopes up to 35 degrees 'generally', despite the fact that the Soil Conservation Service told them that logging on slopes over 27 degrees would create erosion, slumping and 'mass movement'. This is the maximum grade at which drainage banks can stop logging roads from eroding disastrously. Recommendations by the District soil conservationist, Mr R.S. Saul, that logging should be restricted to 30 degrees and "be kept to a minimum" were dismissed. The SEC recommends that no logging ever take place on slopes over 25 degrees - but the Commission is curiously exempt. Try climbing up a 35 degree slope - if you can - and judge its steepness for yourself.

## WATER & ECONOMY

The Mistake S.F. is the water catchment for three towns and numerous settlements. It is now accepted scientifically by hydrologists (water experts) that *old growth forest actually produces water*. Conservative hydrology estimates state that old growth forests produce 12 million litres of water per hectare per year - and that regrowth forests consume 3 million litres of water per hectare per year. Hydrologists point out that this means a loss of 15 megalitres per year, per hectare of old growth forest which is logged or disturbed, to the local community. The flow on costs of this loss can be shown to be disastrous to the economic health of communities in the catchment, as well as disastrous generally.

Put simply, at the end of the dry season the only water coming out of taps in most towns is that produced by intact old growth forest and rainforest. The costs of carting megalitres of water are well known and the cost of water is easy to determine in any shire - look at your water rates. Logging the remaining old growth in the Mistake will cost the Nambucca Shire at least 15 billion litres of water per year! The economic viability of any old growth logging must be measured against this cost to towns and agriculture and its resultant costs to the local economy. Old growth logging is not economically viable.

Filter strips and buffer zones along creeks to ensure water quality and habitat for native animals and plants will only be put in place in the Mistake where a stream has a catchment of 100 ha or more. The Water Resources Commission has hefty fines - tens of thousands of dollars - for any private landholder who wishes to drive a bulldozer within 20 metres of any creek - and a creek is defined by them as any watercourse with banks. No private landholder may routinely fell trees along watercourses. Yet the Commission is exempt from common sense and the law of the land.

"...the EIS has not stressed the need for additional wildlife corridors along streams."

## Endangered Animals

The fauna surveys conducted in the Mistake are entirely inadequate. The Forestry Commission produced an EIS with no accompanying Fauna Impact Statement (FIS) and hurriedly slapped one together using only data obtained from the inadequate EIS and an additional 3 day survey by a single ornithologist (bird specialist) in the middle of winter. On one of these days a strong south-westerly was blowing; "These conditions made location of fauna difficult." Nine species of birds hitherto unconfirmed in the Mistake were discovered in these conditions, but predictably the ornithologist failed to find any other unconfirmed species except foxes, feral dogs and feral cattle.

Local residents aver the existence of many endangered species not found by the specialists, who have never even sighted a koala in the Mistake despite the fact that locals are kept awake by their calls every spring and sight them regularly. When you hear koala mating calls or fights you understand why they're called bears. They are unmistakable and sound like eight foot grizzlies approaching.

The FIS completely fails to address NPWS concerns over the inadequacy of the EIS and attempts to gloss over the disaster they intend to continue perpetrating. The Director of the NPWS told the Commission that they could only continue logging if they fulfilled 22 requirements they had not previously fulfilled. They have still not fulfilled more than half of them but are logging already in two forest compartments in which they've been given exemption from these conditions and intend to proceed in the rest of the forest despite the inadequacy of their report and FIS.

The FIS admits the presence or likely presence of 19 endangered species: koala, tiger quoll (native cats), yellow-bellied glider, parma wallaby, long-nosed potoroo, brush-tailed phascogale, glossy black cockatoo, sooty owl, rufous scrub bird, carpet and diamond pythons, southern angle-headed dragon, sphagnum frog and seven species of bat. The Commission definition of "a [local] significant impact is one that reduces the population under consideration by more than 30%." This means that if they estimate they will kill just under a third of any endangered species outright, the effect is judged to be locally, regionally and nationally insignificant.



# Forestry Commission of N.S.W.



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

Ms Lynne Orrego  
Vice President  
Nambucca Valley Conservation  
Association  
PO Box 123  
BOWRAVILLE NSW 2449

Your reference:

Our reference: M Hickman:dj  
(02) 980 4168

18 February 1993

Dear Ms Orrego

I refer to your request for information in respect of the Big Scrub Environment Centre Freedom of Information (FOI) application No. XX41.

As requested by phone I am providing a breakdown of costs for the information collected. Upon payment of this amount the relevant documents will be forwarded to you. I have numbered the requests for individual items on your application (copy attached) for ease of identification. I understand from Steve Rayson, District Forester, Urunga that you have already received advice in respect of items 1.1 to 1.6, 1.8 and that information in respect of item 2.2, 2.7 and 2.8 are available if required at an additional cost \$52.50 plus photocopying.

	SEARCH & REVIEW	PHOTOCOPYING	
		A4	A3
1.7	50 minutes = \$ 25.00	23	-
1.9	40 minutes = \$ 20.00	11	-
2.1	30 minutes = \$ 15.00	2	2
2.3	30 minutes = \$ 15.00	-	-
2.5	40 minutes = \$ 20.00	9	1
Collation of information and preparation of response	40 minutes = \$ 20.00		
TOTAL	3 hours & 50 minutes = \$115.00	45	3
Photocopying A4-\$0.25/sheet	= \$ 12.75		
A3-\$0.50/sheet			
TOTAL	= \$127.75		
Less 50% reduction	= \$ 63.85		

Although work was completed on items 2.6 and 2.9 no charge has been made. Upon receipt of \$63.85 I will send the documentation to you.

Details of available information are as follows:

- 1.7 As discussed there are no documents relating to the methodology and/or raw data used in compiling the Webster determination. This was mainly due to the survey being based on a review of available literature including previous sightings on the area and, after a field inspection by Webster, anticipated fauna occurrence in similar forest types. Plot location assessments were undertaken as part of the wider Urunga EIS. 23 pages relating to terms of reference and administration surrounding the determination are available.

TIME 50 minutes = \$25.00 Photocopying \$5.75

- 1.9 The draft consultancy brief for the Urunga Fauna Survey is available. The Flora survey is currently being undertaken by the Commission and details will be available on release of the Urunga EIS.

Details of commercial negotiations between the successful consultant and the Commission would necessitate seeking the consultants views on release of that information under Sections 31 and 32 of the FOI legislation. Your advice to proceed with such action is awaited. The cost will be approximately \$10.00.

TIME 40 minutes = \$20.00 Photocopying \$2.75

- 2.1 Details are available.

TIME 30 minutes = \$15.00 Photocopying \$1.50

- 2.3 Details of log volumes added to quotas. No changes to allocations were made specifically from the APM areas. The APM sawlog resource, from a management perspective, was viewed as part replacement of resource for the hardwood withdrawals following the 1982 rainforest decision. Within Urunga District these included Bellingen River State Forest 6,200 ha and Never Never State Forest 2,750 ha.

TIME 30 minutes = \$15.00

- 2.4 Not applicable (See item 2.3).

- 2.5 Ian Barnes - API Forester, Kempsey - Area determination and forest stand condition  
Bruce Coomber - Economist (Marketing Division) Economic Assessment (rates of return)  
Dave Cromarty - Project Forester (Management Planning Division) Volume growth Assessment

E Chiswell - District Forester, Coffs Harbour  
Local Assessment - markets probable  
sale prices.

Additional policy considerations relating to the APM  
purchase are available.

TIME 1 hour = \$30.00 Photocopying \$2.75

2.6 Details of the Agreement with Allen Taylor contains  
information concerning the business affairs of the  
Company and under Section 32 of the FOI legislation  
the Commission is required to write to the Company  
seeking its advice before making a determination to  
release the information or not. I will await your  
advice before taking such action. The cost will be  
approximately \$10.00. *yes*

2.9 The 1989 draft Urunga Management Plan reflects the  
views of a former District Forester which has not  
yet been considered by the Commission. On that  
basis the document is exempt under Clause 9 Schedule  
1 of the FOI Act as it contains matter the  
disclosure of which would disclose an opinion  
prepared for the purpose of the decision-making  
functions of the Commission and would on balance be  
contrary to the public interest. An interim  
Management Plan is currently under consideration by  
the Commission and will be available for release  
following approval in the near future.

The final Management Plan will be dependent on and  
flow from the findings and determination of the  
Urunga EIS currently being undertaken.

If you disagree with my decision to refuse you access to  
these documents you have legal right under Section 34 of  
the FOI Act to have the decision reviewed by the  
Commission. To obtain such a review you should reply in  
writing within twenty-eight (28) days of receipt of this  
letter to the Commissioner for Forests, Building 2, 423  
Pennant Hills Road, Pennant Hills 2120. All requests for  
internal review must be accompanied by the \$40.00  
application fee.

If you are still dissatisfied after the Commission review,  
you may request the Ombudsman at any time to investigate  
the determination. However, if you wish to retain the  
option of later appealing to the District Court, you must  
apply to the Ombudsman within sixty (60) days of receiving  
the determination from your internal review. Requests to  
the Ombudsman must be in writing and are free.

You may appeal to the District Court if you are dissatisfied with a determination from your internal review or after the review by the Ombudsman. Application must be made within sixty (60) days of receiving the results of his/her investigations.

If you require further information in respect of these issues I can be contacted on (02) 980 4168.

Yours sincerely

A handwritten signature in dark ink, appearing to read "Mike Hickman", written in a cursive style.

MIKE HICKMAN  
FOI Co-Ordinator

List 1. Documents wanted from List A

- 1.1 Management Plans for Macksville Management Area - the two or more prepared prior to and not including the July 1978 Plan.
- 1.2 Annual reports for Macksville Management Area -  
1987/88, 1986/87, 1985/86, 1984/85, 1983/84,  
1982/83, 1981/82, 1980/81 and 1991/92.
- 1.3 Ozo copies of the following Forest type maps:  
Girralong West            Bellbrook West  
Hyatts Flat East        Comara East  
Thumb Crk East        Macksville East  
Thumb Crk West        Wenonah Head  
Five Day Crk East
- 1.4 Order of Working (latest edition) (should be July '92 - July '94)
- Mistake State Forest:
  - 1.5 Logging Histories and volumes and species harvested on a compartment by compartment basis.
  - 1.6 All documents on file regarding field survey of flora and fauna carried out by the Forestry Commission (Binns) in 1988 (especially methodology used, hours spent in the field, transects covered etc...) excluding information contained in the Mistake E.I.S., 1991.
  - 1.7 All documents on file regarding field survey of flora and fauna carried out by the Forestry Commission (Webster) in 1992 (especially methodology used, hours spent in the field, transects covered etc...) excluding information contained in the Determination Report '92.
  - 1.8 All documents on file regarding any fauna and/or flora surveys which have been undertaken in the new Urunga Management Area.
  - 1.9 All documents on file regarding fauna/flora surveys to be done for the Urunga E.I.S. i.e. briefs to consultants and methodology and timetable.



List 2: Documents wanted which are not on List A

- 2.1 Details and purchase price of APM properties within the new Urunga Management Area.
- 2.2 Details of log volumes estimated to be on the ex APM properties at the time of purchase.
- 2.3 Details of log volumes per annum to quota, and any long term saw log supply agreements (for the ex APM land) entered into by the Forestry Commission.
- 2.4 Details of pricing arrangements for those sawlogs.
- 2.5 Details of personnel and departments who were involved in drawing up those agreements.
- 2.6 Details of the long term timber supply agreement with Allen Taylor.
- 2.7 Past yield assessments for the Macksville Management Area including methodology and any monitoring documents.
- 2.8 Documents relating to the Permanent Growth Plots (both past and present), their location and statistics on growth rates gained, within the Macksville Management Area.
- 2.9 A copy of the Draft Urunga Management Plan (new).

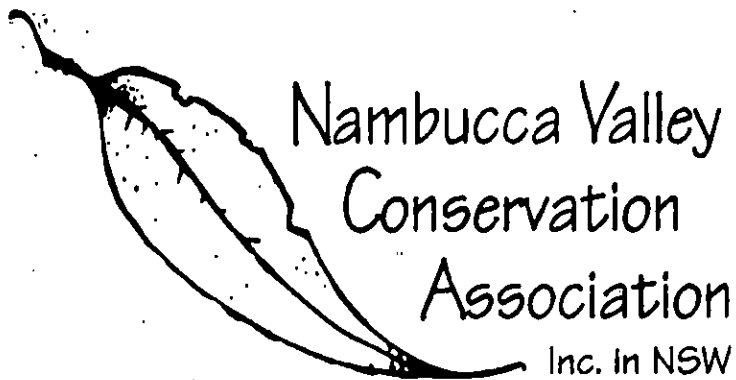
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- 2.9 A copy of the Draft Urunga Management Plan (new).



Lyns/NVCA  
copy

P.O.Box 123,  
Bowraville, 2449.  
Ph/Fax (065) 647808

March 12, 1993

Mr. M. Hickmann  
FOI Co-Ordinator  
Forestry Commission of NSW  
Locked Bag 23  
Pennant Hills 2120 NSW

Dear Mr. Hickmann,

re: FOI application XX41: Lyn Orrego/NVCA

Thank you for your letter of 18 February 1993 re my request for information through the Big Scrub Environment Centre Freedom of Information (FOI) application No. XX41, originally lodged on 22 April 1992.

Please find our comments below on each item. Also please find enclosed a cheque for \$40.80 being for the items listed at the end of this letter.

- 1.1-1.6 Yes, we have accessed the documents from these items which we want with the exception of 1.5 the logging histories (volumes/dates, species) on a compartment by compartment basis for Mistake State Forest. We chose to get copies of the compartments which are on the Order of work list to be logged this year (about 7 compartments). Our request is that we be given permission to access the other compartments on an annual basis as they come up for logging each year. We ask that you confirm that this is acceptable. (Steve Rayson is presently away on holidays). The reason is financial hardship. As we are an unfunded voluntary community group we are forced to use our resources for the highest priority items first.
- 1.7 As 1.7 indicates I was seeking information specifically on Webster's Fauna Impact Statement preparation. You state "23 pages relating to terms of reference and administration surrounding the determination are available." If part of these 23 pages are the brief or versions thereof sent to Webster

Lets care for the environment... Life depends on it

giving him instructions on how the Forestry Commission expected him to prepare the FIS or his responses, then yes, I would like those pages. Otherwise I do not require the 23 pages.

Cost: As this section is not finalised, no cost is, as yet, finalised.

1.8 Mr Steve Raysom gave me the Draft of the Flora and Fauna lists to be attached as an appendix to the Coffs/Urunga EIS which is being prepared now. At the time he told me that was all there was in the way of flora & fauna studies for the Urunga Management Area. This raises the question of how were the lists prepared, ie what documentation were they drawn from? As this item asks for "all documents on file re fauna/flora surveys." I feel we still need the following to be happy with the outcome of our request for this item:

- a) If there are no more documents, a written statement so stating this is the case.
- b) If there are more documents, a list thereof so we can choose which ones we require and
- c) A statement of explanation re how the draft fauna & flora lists were drawn up for the Appendix to the EIS (ie from what source material?)

1.9 Yes, I would like a copy of the "draft consultancy brief for the Urunga Fauna Survey" although I ask why is it a draft it is understood half or more of the work is already completed?

So I would also like a copy of the non-draft, or final version of the Urunga Fauna Survey consultancy brief. It is certainly hoped such a brief exists in a final version before work began and not drawn up or to be drawn up afterwards.

Regarding the details of commercial negotiations for this survey: No we don't need such information but we do want information on the methodology, design, scope, types and locations of traps, haintubes, spotlighting, species targetted, timetable and rationale behind the survey design. This is urgent as the EIS process is in full swing.

Regarding the Flora Survey, your letter says Flora survey details will be available on release of the Urunga EIS. I take this as a refusal of my request yet you have given no reason. We simply want to know the methodology the Forestry Commission is using for this survey, its scope, days in the field, spread of sites studied, etc. We see no reason this information shouldn't be provided and ask you to reconsider and send it to

us.

Cost: 40 mins (\$20) + 11 pages (\$2.25) for the Draft consultancy brief for the Fauna Survey less 50% = \$11.15

2.1 Yes, we would like the details and purchases price of APM properties within the new Urunga Management Area. The details sought are the date of purchase a map of the areas purchased and the purchase price.

Cost: 30 mins (15 \$) + 2A4's, 2A3"s (\$1,50) less 50% = \$8.25

2.2 I have not received an adequate answer to this item so am still requesting the details be provided ie: Details of quota logs over 40 cm, thinnings quality logs under 40 cm, peel quality logs and optional quality logs (all in cubic metres) estimated to be on the ex APM properties at the time of purchase.

Cost: Could you please let me know the estimated cost?

2.3 Regarding your answer that the APM properties added to the Forestry estate to balance what had been removed in the 1982 Rainforest Decision: this of course is a management perspective. However, it still leaves our question unanswered. The APM properties obviously had "x" m3 of timber resources at the time of purchase which would have been assessed to provide "y" m3 in "Z" no. of years when they became ready for harvesting. "Y" and "Z" is the information I seek.

Also, on February 3, 1993, when I met with Steve Rayson regarding this item he indicated he could provide the volumes harvested since purchase and that it would take 1 1/2 hours to find that information. I said to go ahead. However, this information has not yet been provided.

Cost: \$15 sounds a reasonable cost if the above details are provided. We will await your confirmation.

2.4 I feel if this question was explained there would be an applicable answer:  
If sawlogs are located 100 km from a centre they are more expensive to harvest. If the resource located on APM properties is the same price as that anywhere in the district then, it is advantageous to whoever is given the harvesting rights as these forests are closer to coastal centres than say the upriver forests. Therefore the information we seek is:

- a) Are pricing arrangements for sawlogs from ex-APM lands the same as for any other sawlogs in the region and if so what is that price?
- b) If the price is the same throughout the region how is it decided by the Forestry Commission

which purchaser should be given the advantage of being supplied with such a "close to centre" resource?

- 2.5 Thank you for the information provided. Yes. I would like the additional policy considerations relating to the APM purchase.

Cost: \$ 20 plus \$ 2.75 photocopying less 50% = \$11.40

- 2.6 Yes, I would like you to write to the Company seeking their advise on our request. To clarify our request the "details" we seek regarding the longterm timber supply agreement with Allen Taylor are:

- a) what is the total volume per annum in cubic metres?
- b) Is there any specification within the total volume for various species ie Tallowood, Rosegum, Blackbutt, Brushbox, Red Mahogany, White Mahogany, Turpentine, Ironbark?
- c) If there is specification what is that specification in species and percentages of each species?
- d) What say does Allan Taylor have over what species their total allocation is made up of?
- e) How is the species make up of the total allocation decided?
- f) What are the various prices for each species?
- g) What say does Allen Taylor have in where logs are drawn from?
- h) Who decides and on what basis, where logs are drawn from?
- i) A copy of the contract/agreement
- j) What are the compensation clauses in the agreement if the agreement is terminated?
- k) Was the invitation to enter into a longterm agreement with the Forestry Commission for resources advertised, and open to other companies or individuals to also begin negotiations towards such an agreement for those resources?

- l) How and by who was the longterm agreement initiated?

Cost: \$ 10 for the letter to be sent less 50% = \$5.00

- 2.7 On February 3, 1993 I requested Mr Steve Rayson to provide us with a summary of the information available to answer this question. He had said such a summary could be done with 30 minutes of

work. I agreed to that. No summary has as yet been received.

2.8 On February 3 Mr Rayson said he could supply some information on this item with another 30 minutes of work. I agreed. No information has as yet been received.

2.9 Regarding the 1989 Draft Urunga Management Plan: The 1978 Management Plan for the Macksville Management Area (part of new Urunga Management Area) has long been out of date (due for replacement in 1988) however a new plan has not been forthcoming. I have been told by Mr. John Ball (pers.comm.) that the operations in our area are following and based on the 1989 Draft Urunga Management Plan.

It is also obvious from seeing where operations are taking place (up-river forests) that the old plan (technically still the legal plan) is not being followed.

Therefore I submit, the 1989 Draft Management Plan is far more than an "opinion prepared for the purpose of the decision making functions of the Commission." It has actually been a working and fully operated plan in actuality on the ground through the years Mr. Ball was the District Forester and implementing it. I have been asking for this plan for the last six years, at least twice a year and have been told its just a few months away.

I request you reconsider your decision on this item.

My advice is that for this XX 41 FOI application the process of internal review has already taken place and that any requests for review should go straight to the Ombudsman. If this is correct I will first await your reconsideration of this item.

If it is not correct I request an internal review for this item should your reconsideration of it not be favourable. I will happily send the \$ 40 upon clarification of whether it is necessary bearing in mind my advice in the above paragraph.

Thankyou for helping us to get the information we seek. Even though we have been granted the community groups concession the pricing structure for information is still not suitable to us (To date we have paid more than \$280 for search and info on these items). We feel many documents would be more speedily and easily available to the public if the Forestry Commission kept their files better organised. We hope the search time will diminish as the Commission becomes more used to the public seeking information on operations.



6  
Please find enclosed a cheque for \$40.80 being for:

Item 1.9	\$11.15
Item 2.1	\$ 8.25
Item 2.5	\$11.40
Item 2.6	\$ 5.00
Collation & response	\$10.00
TOTAL	\$40.80

Sincerely,

*Lyn Orrego*

Lyn Orrego (Vice-President)

copy to District Forester  
Mr Steve Rayson

P.S. We also ask your consideration of a library system (open to public) in each District Office where as many documents as possible are located for the public to come in and read (+ photocopy if they need) rather than going through the arduous (and expensive) FOI process for basic documents that should be easily accessible to the public.

List 1. Documents wanted from List A

1. Management Plans for Macksville Management Area - the two or more prepared prior to and not including the July 1978 Plan.
  2. Annual reports for Macksville Management Area -  
1987/88, 1986/87, 1985/86, 1984/85, 1983/84,  
1982/83, 1981/82, 1980/81 and 1991/92.
  3. Ozo copies of the following Forest type maps:  
Girralong West            Bellbrook West  
Hyatts Flat East        Comara East  
Thumb Crk East        Macksville East  
Thumb Crk West        Wenonah Head  
Five Day Crk East
  4. Order of Working (latest edition) (should be July '92 - July '94)
- Mistake State Forest:
5. Logging Histories and volumes and species harvested on a compartment by compartment basis.
  6. All documents on file regarding field survey of flora and fauna carried out by the Forestry Commission (Binns) in 1988 (especially methodology used, hours spent in the field, transects covered etc...) excluding information contained in the Mistake E.I.S., 1991.
  7. All documents on file regarding field survey of flora and fauna carried out by the Forestry Commission (Webster) in 1992 (especially methodology used, hours spent in the field, transects covered etc...) excluding information contained in the Determination Report '92.
  8. All documents on file regarding any fauna and/or flora surveys which have been undertaken in the new Urunga Management Area.
  9. All documents on file regarding fauna/flora surveys to be done for the Urunga E.I.S. i.e. briefs to consultants and methodology and timetable.

List 2: Documents wanted which are not on List A

- 2.1 Details and purchase price of APM properties within the new Urunga Management Area.
- 2.2 Details of log volumes estimated to be on the ex APM properties at the time of purchase.
- 2.3 Details of log volumes per annum to quota, and any long term saw log supply agreements (for the ex APM land) entered into by the Forestry Commission.
- 2.4 Details of pricing arrangements for those sawlogs.
- 2.5 Details of personnel and departments who were involved in drawing up those agreements.
- 2.6 Details of the long term timber supply agreement with Allen Taylor.
- 2.7 Past yield assessments for the Macksville Management Area including methodology and any monitoring documents.
- 2.8 Documents relating to the Permanent Growth Plots (both past and present), their location and statistics on growth rates gained, within the Macksville Management Area.
- 2.9 A copy of the Draft Urunga Management Plan (new).

*We want a library service  
where we can take docs  
out + photocopy them*

**NAMBUCCA INDUSTRIAL ENGINES**

Repairs and service for all small petrol & diesel engines.

MOTORCYCLES - OUTBOARDS  
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BRUSH-CUTTERS & CHAINSAWS  
\* Persons discount available

39 Duke St., Nambucca Industrial Estate  
Phone: 68 9460  
(Opp. Lee Devereux Smith Repairs)

NAMBUCCA VALLEY

# GUARDIAN

NEWS

Wed. March 10 '93

90 YEARS

1903-1993

# Green 'police' take to bush

Forest campaigners have set up a green "police" squad in the Mistake State Forest west of Bowraville to uncover breaches of environmental laws.

With a base camp located about a half-hour's drive from Argents Hill, the group is averaging 10 people a day watching for breaches of logging regulations as they occur.

They've been described by a press release from some camp participants as a "green policing group" but supporter and district resident Vanessa Farmer stresses it's a watch-dog group and is not seeking confrontations with loggers in the forest.

"We'd prefer to have it that way," she said yesterday.

About half of the campers and their supporters are from the local district and the rest have included visitors from as far as Sydney.

A marquee has been set up and participants are surveying areas not logged and sites of current operations.

Ms Farmer said one focus was on any possible erosion in the area.

## Watchdogs on logging work

She and another local district resident, Trevor Budd, say they've been regularly visiting and supporting the camp.

Daily activities at the site include taking slope measurements, recordings of growth, and animal surveys.

The group moved camp three days ago but are still in the general area of the Mistake State Forest, largely within the Nambucca Shire.

Ms Farmer said the group will stay for an indefinite period. Supplies are being supplemented with those taken up by camp participants.

A press release issued by the group is headed Forest Actions and claims the Forestry Commission has given permission for them to be there.

"The forest camps of 1993 have begun," it says.

Workshops are to be held by the group members on topics such as tree identification, tree climbing, and the identification of possible forest breaches.

They also are said to be "documenting the last stands of old growth habitat forests on the NSW North Coast".

"These forests are due to be logged this year, before an already agreed embargo on old growth logging comes into force by 1995," their statement says.

"But they can be reserved for their high conservation value if they are documented before Australia loses them forever.

"We believe there's no point passing strict environmental legislation unless it's enforced."

Coffs Harbour-based Community Liaison officer for the Forestry Commission's Northern Region, Mr Dean Anderson, says the group has been asked to observe safety procedures when near operations, for their own well-being.

They're being asked to wear hard hats and boots when in areas being logged and not to go within 200 metres of an active operation.

Catholic School, a good day for a Frank Partridge student, pleasant atmosphere for Bowraville Central School carnival and profiles on staff from the Nambucca Valley Christian Community School.

## Triumph

The Macksville Sea Eagles were too good for the visitors at a Sevens tournament on Sunday - see back page

## Regular Features

Letters .....	5
Social News .....	6
Crossword .....	17
In Touch with Law .....	18
Travel Talk .....	19
Classifieds .....	20, 21

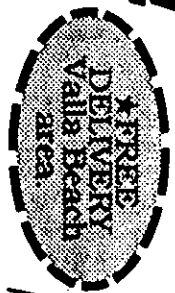
# Happy Gardening!

Beautiful BUSH ROCK Choose your own for that special look!

- PRODUCT LIST - Available in bag or bulk:-**
- GARDEN SOIL
  - SAWDUST
  - PINE BARK (2 sizes)
  - TOPSOIL
  - PINE BARK FINES
  - SOLID FILL

- ORGANIC POTTING MIX
- WOOD ASH
- COMPOSTED COW MANURE
- FLITCHES

- BUSH ROCK
- SLEEPERS

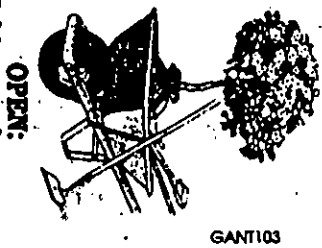


**PINE BARK**

Temite resistant, long lasting, best looking mulch

**\$45** per cubic metre

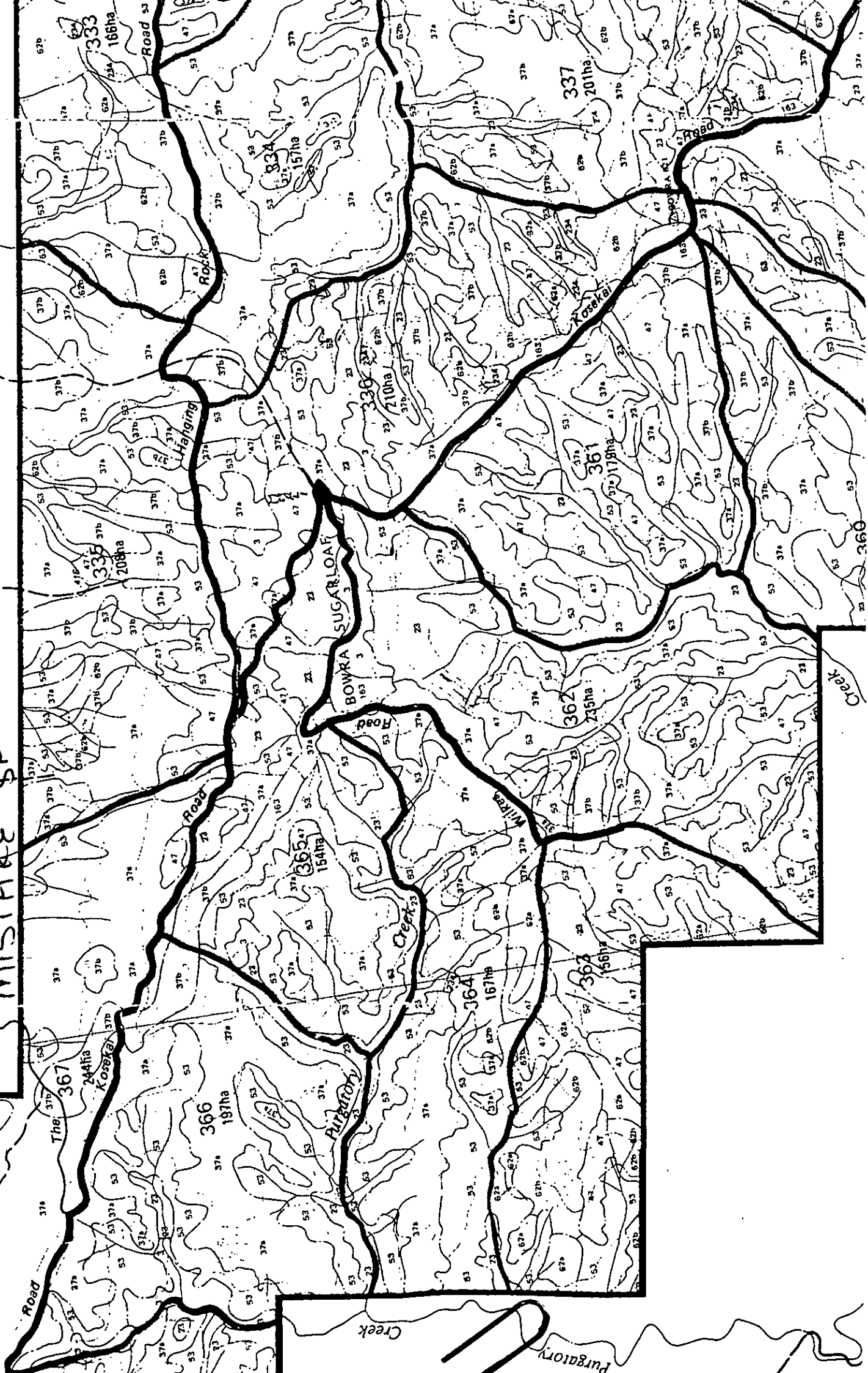
**\$39** per cubic metre (3 metres)



OPEN:

GANT103

## Monstrous Backbitten



MEDIA RELEASE

MARCH 19, 1993

FORESTRY COMMISSION DENIAL OF ILLEGAL LOGGING PREMATURE

The Forestry Commission's dismissal of claims there is illegal logging occurring in Mistake State Forest are premature, knee-jerk reactions, especially as an on site meeting to inspect the claims is not planned until next Friday, according to a joint statement issued today by two local environment groups, Nambucca Valley Conservation Association and South Arm Catchment Protection Group.

"Our groups inspected the latest logging in Mistake on Tuesday after reports from the Mistake Forest Protection Group, who have been camped in the forest as observers, telling of soil erosion, turbid streams and logging of rainforest species," said NVCA spokesperson Lyn Orrego.

"What we saw was sickeningly like the damage done in the logging of Oakes State Forest (near Killiecrankie Mountain) this time last year. The Department of Conservation and Land Management (CALM) report on Oakes has just been released saying 90,000 tonnes of soil was lost into the head waters of the Bellinger river. Here again, in Mistake, we saw improperly formed roads without table drains put through rainforest type vegetation, trashed palms and brown turbid water flowing in previously clear waterfalls and pools," she said.

"We believe codes and conditions of logging have been broken and have reported these to the Environment Protection Authority (EPA) and to Forestry Commission with follow up documentation being sent.

"To date only one claim, of trees being felled into streams, has been investigated by the Forestry Commission and called "bad practice" by them but not a breach. These latest claims have not yet been investigated.

Mr Trevor Bailey, spokesperson for the South Arm Protection Group, said their group had been seriously concerned for more than ten years about logging practices in Mistake State Forest including the logging of rainforest, destabilisation and subsequent erosion of very steep hillsides leading to siltation of creeks coming out of Mistake State Forest into the Nambucca River System.

"Justice Hemmings, in 1989, said he had serious concerns about the logging there. He accepted Professor McGarrity's evidence that serious erosion was occurring on slopes over 20 degrees. Most of Mistake is over 20 degrees," he said.

"On Tuesday last I witnessed logging in rainforest, significant roading over drainage lines and silt and debris washing into creeks in the Purgatory creek catchment. It was the same type of destruction which led our group to begin court action in 1987.

"I am disgusted by what I have seen. It is an indictment of the Forestry Commission that they have learnt nothing since then nor since the Oakes State Forest debacle over which they are being taken to court by the EPA for severe breaches of codes.

For info: Lyn Orrego (065) 647478 Trevor Bailey (066) 552407  
or (065) 647633



Nambucca Valley  
Conservation  
Association  
Inc. in NSW

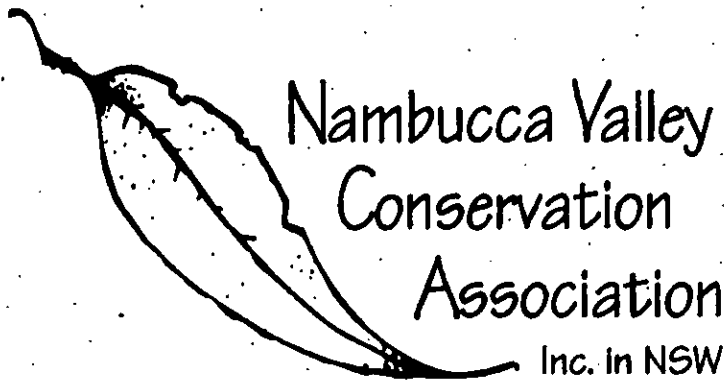
P.O. Box 123,  
Bowraville, 2449.  
(065) 647 808

*With Compliments*

*March 22<sup>nd</sup> 93*

*Dear John, Enclosed; our letter to EPA  
- Press Release (Thevor B + me)  
- Variations to the Harvest Plan which*

*I still haven't figured out completely (I need to log dump numbers)  
I did an interview this am (2KPTR) Steve Rayson followed saying  
definitely no breaches, not like Oakes etc! Meeting with FC is Friday  
Let's care for the environment... Life depends on it. *John Carr*  
No sign of your hat yet! *X & Sep**



P.O.Box 123,  
Bowraville, 2449.  
Ph/Fax (065) 647808

March 18, 1993

Mr. John Keats,  
Environment Protection Authority  
49 Victoria St.  
Grafton NSW

Copy  
(some photos missing)

Dear John,

re: report of turbidity in Purgatory Creek Catchment  
within compartments 368-9 Mistake State Forest

Further to my phone conversation with you today reporting turbidity in the catchment creeks of Purgatory Creek within compartments 368-9 of Mistake State Forest I now put my report in writing to you.

Thankyou for agreeing to pass on our concerns to Mr. Ian Greenbank who you said is organising a joint inspection of the compartments with the Forestry Commission (FC), Department of Conservation and Land Management (CALM) and the Environment Protection Authority (EPA).

Our Association inspected the above area on March 16, 1993 following reports of pollution from the logging operations made to us by the Mistake Forest Protection Group.

I witnessed newly made roads without table drains, roading which appeared to have been "bladed-off", roading of excessive width for the purpose, brown turbid water running off into a watercourse of waterfalls and pools all brown with sediment and movement of soils from uphill batters slumping before our eyes as we watched.

The map attached shows the location of the various things witnessed. The photos attached refer to the same things and were taken on the day.

The situation is of great concern to our association, especially in the light of the recently released CALM report on Oakes State Forest which showed the forestry operations to have caused 90,000 tonnes of soil to be lost into the headwaters of the Bellinger River.

We request an inspection of the site and the above complaints. We also request that the report following the inspection be made

**Lets care for the environment... Life depends on it**



available to us straight away, including details of any remedial actions required. I also request that I be allowed to go along on the inspection in order to further explain this report and the locations.

Finally we request that the Soil Erosion Mitigation Guidelines (March 5, 1993), newly adopted by CALM, be applied to the EPA Pollution Control License to the Forestry Commission for their operations in Mistake State Forest immediately. The Forestry Commission themselves should have no argument with this as page 12 of the Environmental Impact Statement Assessment Report & Determination (August 1992) for Mistake State Forest states:

"The Standard Erosion Mitigation Conditions (SEMC's) are at present being reviewed by the Soil Conservation Service and the Forestry Commission. ....The reviewed conditions will not be available before determination of this EIS but it goes without saying that operations will be subject to any future amended conditions."

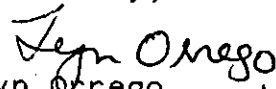
As you would be aware the License (Clause 2 (1)) States operations must comply with the SEMC's, "as ammended from time to time". We urge your approval of the new Guidelines in writing as provided for in Clause 2 (3) of the License.

The type of damage done in Oakes must not be repeated in Mistake State Forest. Mistake is extremely steep country and so has similar inherent erosion problems.

Soil expert, Professor McGarrity, who studied Mistake State SF, recommended no logging over 25 degrees for this area yet the Forestry Commission are permitting logging up to 35 degrees.

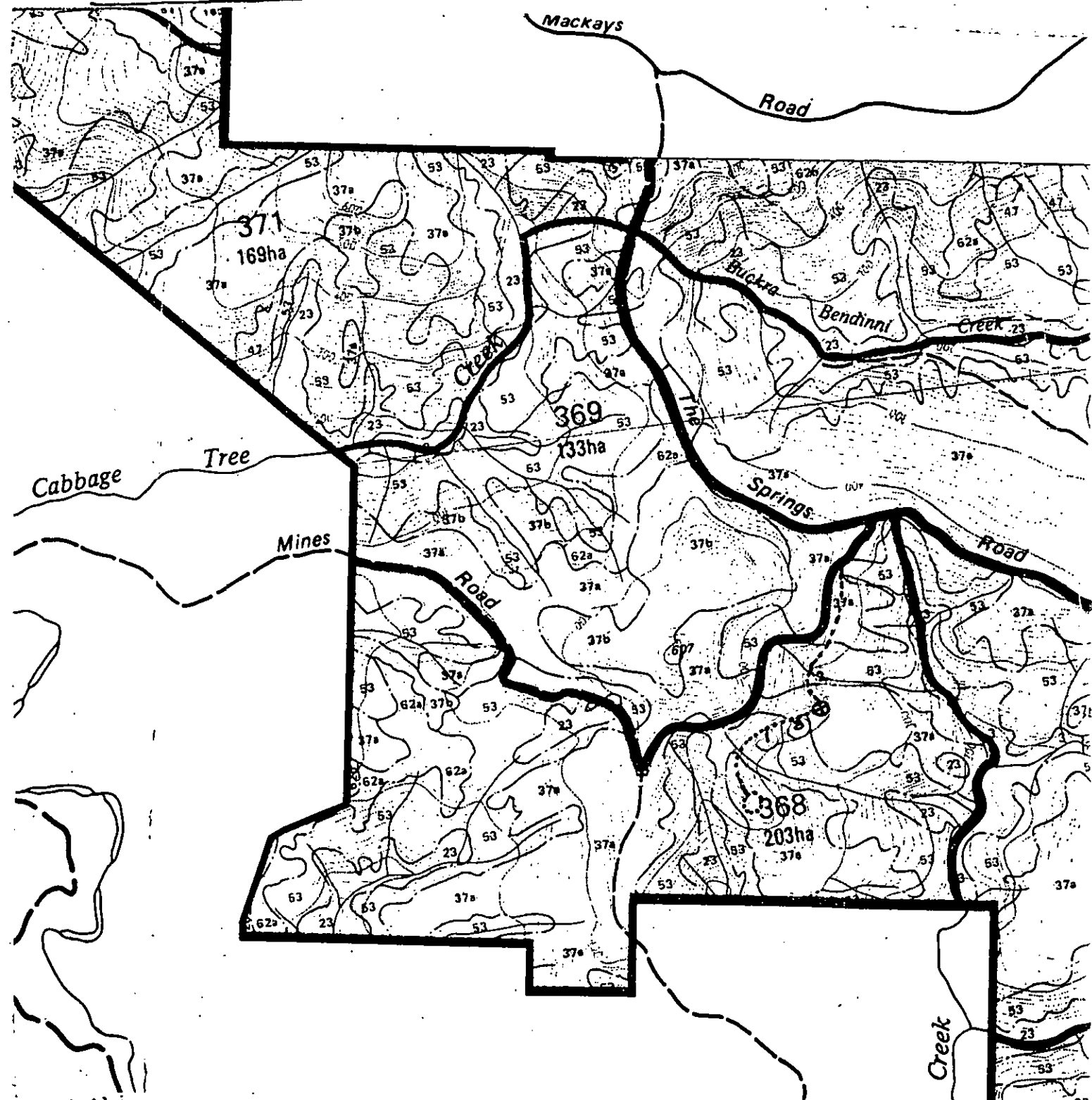
Thankyou for receiving our report and for acting on our requests. We await your reply.

Sincerely,

  
Lyn Orrego  
Vice-President

# Location Map

## Mistake State Forest



### KEY

- ① Photo 1 location
- ② Photo 2 location
- ③ Photo 3 location

--- feeder road shown on Harvesting Plan issued 13/10/92

⊗ log dump shown on Harvesting Plan issued 13/10/92

... road not shown on Harvesting Plan issued 13/10/92

⊙ log dump not shown on Harvesting Plan issued 13/10/92

Also note road traverses side slope measured approx 36° in vicinity 1.

"the area"

PHOTOS:



Photo 1 : overwide road, no drain, batter collapse  
Cpts 368-9 Mistake State Forest March 16, 1993

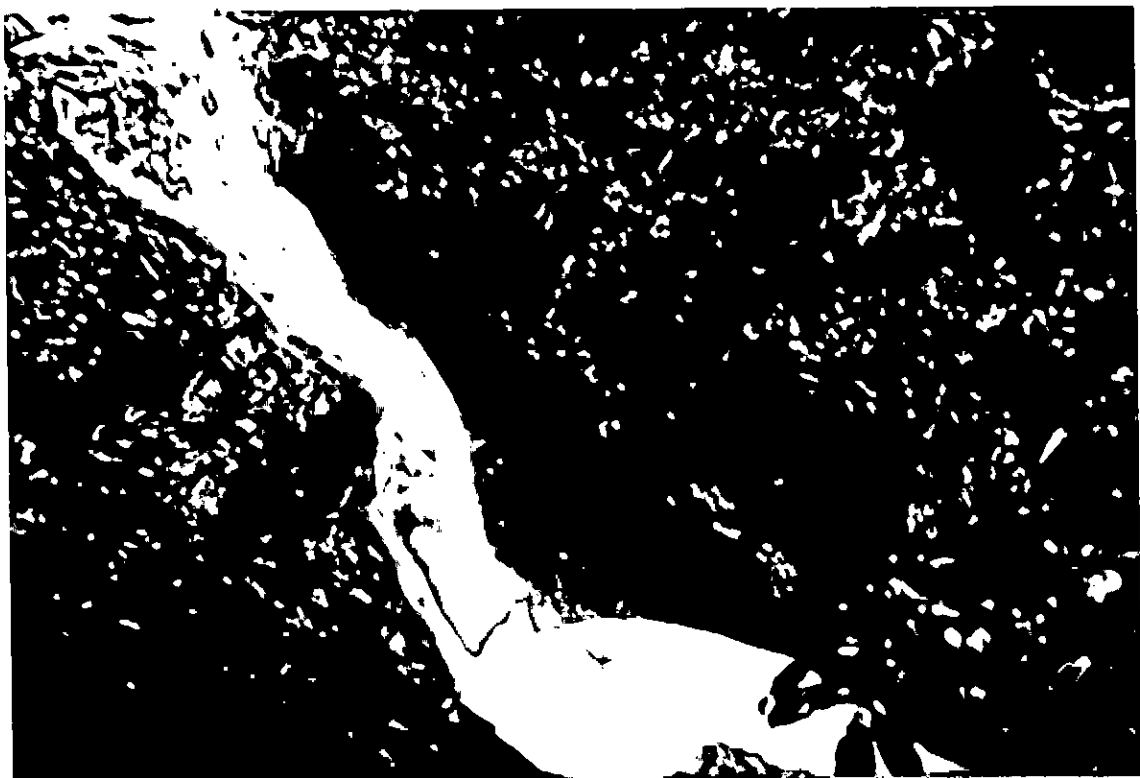


Photo 2: Catchment creek to Purgatory Creek: turbid  
brown water in pool after pool descending steep  
course below logging road in Cpts 368-9  
Mistake State Forest : March 16, 1993

# List of claims of Breaches of Code and Conditions in the area

## 1. Soil Erosion Mitigation Conditions:

- A. 2.1.1 Minor Roads (ii) Wherever the type of operations permit and as far as practicable, minor roads should be constructed with cross fall drainage.

Comment: not done

- B. 2.1.1. Minor Roads (iii) Immediately the logging operation has ceased in any section (even if it is planned to use the road at any time in the future) the road shall be drained by cross banks unless otherwise specified.

Comment: no crossbanks.

- C. 2.1.1. Minor Roads (vii) "Blading-off" on minor roads shall be permitted only where damage is minimal and subsequent drainage and repair is possible. Each "blading-off" operation must be specifically approved. Where "blading-off" is permitted the material removed must be placed in a recoverable position and replaced when practicable.

Comment: The road seems to have been dug down excessively through several "blading off" passes, in place 8 feet below natural soil levels and where this was not necessary.

- D. 2.1 Roads (i) Roads shall be properly formed, and they shall be gravelled if the density of traffic so warrants and this is specified.

Comment: Not properly formed. No cross fall drainage, no table drains, no spoon drains, batters not stable.

- E. 2.1 Roads (ii) All batters shall be constructed to a stable slope. Consolidation may be necessary on fills to minimize subsequent slumping and erosion of fill batters. Revegetation of batters may be required on some roads, and this shall be carried out when specified.

Comment: Head batters not stable. Moving and collapsing before our eyes. See photos.

- F. 1. General (iii) The person authorized by the Commission shall ensure that all activities connected with the logging operations on the authorized area shall be conducted in such a manner that erosion is not aggravated and shall carry out any instructions given by the Commissioner or his delegate with a view to minimizing or preventing erosion.

## 2. Code of Logging Practices:

- A. 7. Snigging + Dumping 7.1 All operations shall be carried out in such a manner as to minimize soil disturbance, water pollution and environmental damage generally.

Comment: Obviously not achieved.

- B. 7. Snigging + Dumping 7.2 Snig track construction is not permitted on slopes over 35°, (30° for High Erosion Hazard) unless specifically authorised.

Comment: According to our clinometer measurements, and if not authorised, this condition breached in vicinity of photo 1.

- C. 7 Snigging + Dumping 7.10 Drainage of snig tracks and minor roads, other than permanent fire trails, shall be carried out in conformity with the Standard Erosion Mitigation Conditions. The required frequency of cross drainage banks will be prescribed in the harvesting plan. Drainage shall be carried out progressively on each track upon completion of, or temporary cessation of, operations.

Comment: Not complied with  
+ See above

# NOTICE OF VARIATION AND APPROVAL TO A HARVESTING PLAN

Location  
Details

Cpt. 368 Harvesting Plan.....  
State Forest Mistake Approval Date 13-10-92  
Contractor R & M Neaves Supervising  
FA/Forester.....

Nature of Variation

Direction of all rd changed near log dump  
No 3 for better alignment. Hollow log put in  
loamage line dirt filled over top for better  
grade on corner.

Variation advised to:

Contractor Contractors employee

(Specify who)

Mill representative

(Specify who)

Signed

Date

# NOTICE OF VARIATION AND APPROVAL TO A HARVESTING PLAN

Location  
Details

Cpt. 369 Harvesting Plan.....  
State Forest MISTAKE Approval Date 13-10-92  
Contractor R & M NEAVES Supervising  
FA/Forester.....

Nature of Variation

Change in location of log dump from Miner  
Rd to move central location for logging of dt 369.

Variation advised to:

Contractor Contractors employee

(Specify who)

Mill representative

(Specify who)

Signed

Date

# NOTICE OF VARIATION AND APPROVAL TO A HARVESTING PLAN

Location  
Details

Cpt. 368

Harvesting Plan

State Forest MISTAKE

Approval Date 13-10-92

Contractor R. M. NEAVES

Supervising  
F.A./Forester

Nature of Variation

Log dump No 4 built only 6 loads of logs sent to mill. Ridge to be logged from this dump needing track of 20' to be constructed, being wet season drainage could be a problem, so continued opening old logging Rd to log dump No 5.

Variation advised to:

Contractor Contractors employee

(Specify who)

Contractors Employee

Mill representative

Specify who)

Signed

*[Signature]*

Date 4-3-93

# NOTICE OF VARIATION AND APPROVAL TO A HARVESTING PLAN

Location  
Details

Cpt. 368

Harvesting Plan

State Forest Mistake

Approval Date 13-10-92

Contractor R. M. Neaves

Supervising  
F.A./Forester

Nature of Variation

Part of old road between dump No 4 & 5 to steep had to put in short side cut to reduce the grade.

Variation advised to:

Contractor Contractors employee

(Specify who)

Contractors employee

Mill representative

Specify who)

Signed

*[Signature]*

Date 5-3-93

# NOTICE OF VARIATION AND APPROVAL TO A HARVESTING PLAN

Location  
Details

Cpt. 369

Harvesting Plan

State Forest MISTAKE

Approval Date 13-10-92

Contractor R. M. NEAVES

Supervising  
F.A./Forester

Nature of Variation

Log dump N. 3 change location

Better position for logging

Variation advised to:

Contractor Contractors employee

(Specify who)

Contractors employee

Mill representative

(Specify who)

Signed

Ron [Signature]

Date

23-11-92

## NOTICE OF VARIATION AND APPROVAL TO A HARVESTING PLAN

Cpt. 368

Harvesting Plan

State Forest MISTAKE

Approval Date 13-10-92

Contractor R. M. NEAVES

Supervising  
F.A./Forester

Nature of Variation

Logging boundary changed to follow  
natural boundary. Error to recognise in  
the field. SW corner of 368.

Variation advised to:

Contractor

Contractors employee

(Specify who)

Contractors employee

Mill representative

(Specify who)

Signed

Ron [Signature]

12-92

DEPTH OF LITTER LAYER (surface to soil):

cm.

LOGS ON GROUND (diameter >25cm) Average Area Covered:

2  
m

FIRE HISTORY

Most Recent Fire

(please circle No):

0 no evidence

1 light

2 moderate

3 severe

Historical Record:

LOGGING HISTORY

Most Recent Logging

(please circle No):

0 no evidence

1 light

2 moderate

3 severe

Historical Record:

STAGS (dead trees):

No	% of canopy height

TREE STUMPS (logged):

No	circumference

CANOPY STRUCTURE

Select Specie Presence In Each Layer (ignore numbers for ground layer),

0 none

1 rare <5

2 occasional 5-20

3 common 20-50

4 very common >50

SUBCANOPY LAYER

specie	presence
eucalypt	
rainforest	
casuarina	
cypress	
wattle	
banksia	
hoop pine	
vines	
other	

SHRUB LAYER

specie	presence
banksia	
tree fern	
grass tree	
rainforest	
wattle	
vines	
lantana	
hakea	
other	

GROUND LAYER

specie	presence
lomandra	
grasses	
bracken	
ferns	
heath	
bare (incl. litter)	
exposed rock	
other	

Explain How Accurately This Plot Represents The Surrounding Forest?:



# FOREST SURVEY RECORDING SHEET CANOPY CIRCLE PLOT OF 12 TREES

Plot No:  
Compartment No:  
Map Name:  
Map Coordinates:  
Locality:  
Site Photo Roll:  
Air Photo Run:

Date:  
Recorder:  
Altitude:  
Aspect:  
Slope:  
Frame No:  
Print No:

TOPOGRAPHY (please circle No):

- 1 crest
- 2 saddle
- 3 upper slope
- 4 middle slope
- 5 lower slope
- 6 simple slope
- 7 flat
- 8 alluvial
- 9 minor gully
- 10 creek

SOIL TYPE (please circle No):

- 1 clay
- 2 loam
- 3 sand
- 4 organic (eg. peat)

CANOPY TREES (circle of 12):

N.B. -Indicate maturity as juvenile, mature or senescent.

-For fire scars, record width at centre and total vertical length.

-All measurements are in metres unless otherwise specified.

No	SPECIE	MATURITY (J, M or S)	CIRC. B.H.	FIRE SCAR(S)	
				W	L
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

HEIGHT OF CANOPY:

No OF EMERGENT TREES ABOVE CANOPY:

DISTANCE OF 2 FURTHEST TREES:

# RED ALERT!

## OLD GROWTH IS BEING LOGGED NOW!

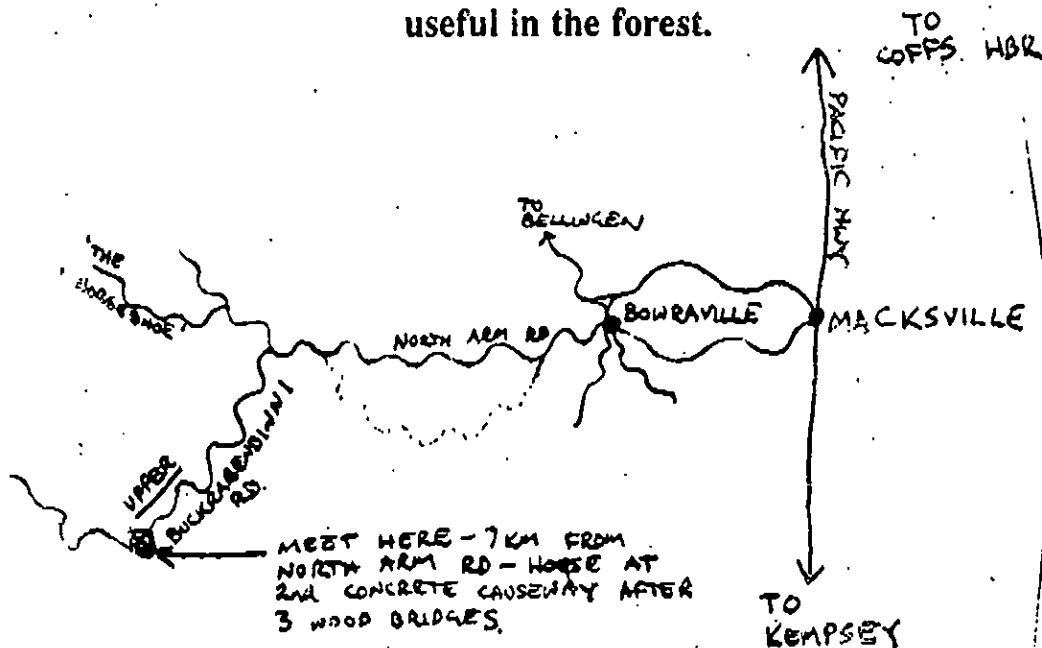
HELP SAVE THE OLD GROWTH AND ENDANGERED ANIMALS OF THE MISTAKE STATE FOREST - IT'S A MISTAKE ONLY YOU CAN CORRECT

The Forestry Commission is LOGGING OLD GROWTH NOW in northern NSW. They are trashing habitat trees, canopy and rainforest in the last Old Growth in the Nambucca Valley region, between Kempsey and Coffs Harbour.

They are LOGGING NOW in the isolated, dwindling sanctuaries of at least 19 ENDANGERED SPECIES in the Mistake Forest. Their studies and practices in this mountainous region are a very bad joke. See for yourself!

**URGENT! PLEASE HELP NOW!**

This forest is NOT protected by laws which now govern other forests due to a 'legal loophole'. It contains THOUSANDS OF HECTARES of PREVIOUSLY UNLOGGED OLD GROWTH. WE NEED YOU to help stop Forestry's madness NOW. PLEASE COME AND HELP or send any equipment that may be useful in the forest.



### YOU DON'T HAVE TO BE ARRESTED!

**THIS IS A TOTALLY NON-VIOLENT FOREST ACTION.**

LEAVE NON-NATIVE PETS BEHIND. NO DOGS, CATS, RATS ETC. IN ENDANGERED SPECIES HABITAT!  
BRING FOOD, SLEEPING/CAMPING GEAR, MUSICAL INSTRUMENTS, BATTERIES, COMMUNICATIONS GEAR, VEHICLES, CLIMBING GEAR, CAMERAS, POSITIVE ENERGY, ETC.

PHONE (065) 644108 FOR UP TO DATE INFORMATION - OR THE BELLINGEN ENVIRONMENT CENTRE (066) 552599. WE URGENTLY NEED DONATIONS OF MONEY, EQUIPMENT AND SUPPLIES. SEND FUNDS TO the OLD GROWTH SURVIVAL FUND c/o PO Box 152 Bellingen 2454

**OM GAIA!**