



Cumberland Bird Observers Club

Baulkham Hills NSW 1755
www.cboc.org.au

7 November 2019

TO:
nrc@nrc.nsw.gov.au

Dear Sir/Madam,

**Re: DRAFT Coastal Integrated Forestry Approvals Monitoring Program 2019-2024,
October 2019**

Cumberland Bird Observers Club Inc (CBOC) is most interested in those parts of the Coastal IFOA monitoring program relevant to the maintenance of wildlife habitat across large areas of State Forest where the predominant land use is timber production from native (mainly eucalypt) tree species.

The fauna most likely to be adversely affected by timber extraction are species that rely heavily on mature and "overmature" trees of great age (about 120-200+ years old) which provide food resources and (particularly) hollows for breeding and shelter. This includes forest owls, cockatoos, most parrots, various smaller bird species; gliding possums, other possum species, numerous bat species, various other smaller arboreal marsupials.

Thus we consider that one of the most important aims of native forest management and monitoring is to maintain viable areas of suitable habitat across more or less exploited landscapes, sufficient to ensure that these old-tree dependent fauna can survive, in numbers greater than would just suffice to maintain them near the edge of local or regional extinction.

Comments below refer mainly to this aspect of the monitoring proposals (but not implying that other aspects are unimportant).

A stated purpose of the monitoring program is to ensure that the monitoring of the Coastal IFOA is delivered effectively and that its objectives and outcomes are being achieved within the available resources. This sounds fair enough. We realise that budgets will almost always need to be constrained to an extent, but **on-ground monitoring work to maintain quality arboreal wildlife habitat must not be under-funded**, especially in earlier stages. Some of the workload of detecting animals and defining necessary habitat features could ultimately be done by remote sensing and camera traps, but such methods should only be used after they are thoroughly ground-truthed to eliminate over- or under-estimation.

Examination of previous research on arboreal fauna and its needs, done back in the 1980s-1990s by NSW Forestry Commission researchers, may provide some useful guidance (if not already checked).

(As an aside but very relevant to the above discussion of old tree-dependent fauna, it is extremely concerning to learn that the NSW Government has been flirting (at least) with the idea of "de-classifying" areas of old-growth trees on the North Coast, which were described and protected over 20 years ago under the first RFA. The aim of this would certainly be to remove the long-standing and no doubt carefully considered protection so sawmillers can get at them. The areas under threat are far from trivial - nearly 15,000 ha - and would probably contain very large numbers of the sorts of old trees that are vital to the survival of arboreal fauna described above.

Unless this idea is scrapped, as it should be, the Government could be in the absurd and most undesirable position of investing a lot (hopefully) of effort in trying to maintain patches of this type of habitat and its wildlife inhabitants within intensively exploited forests, while at the same time allowing the destruction of larger areas of existing natural, high quality habitat and the death of untold numbers of animals that do live there.)

Statements in the monitoring program document such as: "The NSW FMIP (Forest Monitoring and Improvement Program) is a cross-tenure program that will lead and coordinate monitoring, evaluation and research for improved forest management on public and private land, including national parks, state forests" are rather mysterious. It is not explained why National Parks (and presumably including other NPWS reserves) are mentioned in this context, even though activities like "improved forest management" are scarcely, if at all, relevant in such reserves.

We consider the monitoring proposal document generally is set out logically. It is more in the nature of a checklist than a detailed prescription. Our further, mostly minor comments and suggestions are given below under subject headings as used in the monitoring program draft.

Monitoring compliance - This is very important. An independent evaluation of compliance is planned to be conducted every five years, but this is probably not frequent enough. Compliance evaluation, to investigate reasons for good or poor achievement of compliance, is a good idea if done honestly and diligently.

Informal annual reviews linked to annual forums and formal reviews held every five years are proposed, starting in 2024. The formal reviews should be the main events, with information from annual reviews feeding in. Diligence will be needed to ensure this program is kept up to date. Detailed and honest/clear public reporting of annual and 5-year reviews is good idea and needs to be ensured.

1.2 Program schedule. We wonder if health and species assessment on only 20% of sample plots per year would be adequate, especially for large-tree and hollow-dependent fauna. If climate becomes very unpredictable and habitually more extreme, with more fires and/or more severe fires for example, the populations of fauna may change (probably fall) greatly over large areas in short periods. It would be preferable to comprehensively monitor the Coastal IFOA area more frequently (e.g. measure plots every 2-3 years, not every 5 years). If keeping the forests productive in terms

of timber *and* wildlife is considered to be important, finding extra resources to collect accurate data necessary for this should be seriously considered.

2.3 Steering Committee: Presumably a representative of OEH (or new equivalent) is included, but not one from NPWS (unless as subset of a mega-department)? Four independent experts should include someone with a lot of expertise in managing arboreal fauna species dependent on large/old/hollow trees, in commercial forest areas (we do not know if this group as proposed does or does not have such an expert.)

IFOA Objectives - specific for species (in Table 7): "*Minimum* measures to protect species, communities and their habitats from the impacts of forestry operations" - better if greater than "minimum" protection measures were prescribed and applied, to allow more margin for error, climate variation etc.

4.3 Trends

Includes the statement "forest management under the Coastal IFOA can be compared with forest management on the national parks estate, Crown land, private land and other state forests. This will help determine if changes to environmental values and wood supply can be attributed to the Coastal IFOA conditions or if external factors are also affecting environmental values and wood supply on other tenures." It is not clear if the proposed assessment of "wood supply" is supposed to include NPWS land. If so, is there a malign intent to eye the parks as a potential source of "wood supply" (such as when State Forest wood supplies run short)? Hopefully not!!

5.1.1 Evaluating existing species management plans (fauna)

Five plans only; 4 being re-written. There appear to be none for owls, parrots, gliders or koala (?) Probably there should be. Criteria for species to have a plan are not known to CBOC.

5.2 Detailed design of monitoring strategies

Monitoring key habitat features - Working "within the available resources" is necessary, but hopefully would not be limited too much by unwillingness to provide enough resources to do a comprehensive job.

Need regular inspections by skilled people **plus** remote sensing detection and camera traps; not just remote methods.

Monitoring species presence - Again, there should not be too much reliance on remote sensing. Would probably need rigorous ground-checking by skilled people, at least in earlier stages. A need exists for partnership with research institutions to develop a reliable experimental design - this is recognised in the draft.

Likewise, researchers need to be sure that captured acoustic data can be accurately translated into fauna species presence and abundance. Beware of consistent over- or under-estimation of species, or bias in numbers of individuals within some species. Ground-truthing is important.

Table 18: Forest regeneration and forest structure: Bell miner induced dieback is not specifically dealt with. It is a growing threat to smaller bush birds.

Under aquatic habitat and water quality section (Table 19), the main monitoring question of interest bird-wise is: Are the exclusion zone conditions effective in reducing the impact of forestry operations on Coastal SEPP wetlands? Possible impacts on birds from too narrow buffer zones could include: felled tree heads polluting water; loss or damage to lake edge trees used as roost or nest sites by birds (e.g. paperbarks); general damage to or reduction of vegetation near water, removing or degrading habitat areas.

Yours sincerely,

I G Johnson

I.G. Johnson

Conservation Officer,

berland Bird Observers Club Inc

