

Firstly thank you for the opportunity comment on the Regional Forest Agreement Review

Secondly I believe the native forest logging industry must be wound down and our beautiful native forests be managed according to conservation and recreation values. The number of jobs in the sector is minimal and if that is the main driver for the continued logging, the simplification of the biodiversity and the destruction of native wildlife then we should look at transitional jobs for those people affected. For inspiration check out this idea for alternative employment:

<https://www.facebook.com/climatecouncil/videos/1214603878676203/>

The current 20 year agreement is a farce because it was predicated on 5 yearly reviews to provide guidance and correction of the licence requirements etc. As this didn't happen or happened in a very untimely manner confidence in the RFAs has been shredded. The idea of accepting promises that the next 20 year agreement will be any different is ludicrous and frankly unbelievable despite proposed 5 year reviews

Nevertheless, the RFA reviewers are no doubt looking for input working on the basis that the RFAs will be renewed. The following comments are offered by way of improving any future agreements:

Address the hopelessly weak compliance regime

In my Southern Region the EPA has been monitoring the harvesting operations in a number of State Forests. Its field staff are conducting pre-harvest assessments which provide an opportunity to work with FCNSW to ensure the forest mark-up is thorough and meets their legal requirements, especially H & R selection. They are also conducting post harvest audits to collect evidence of breaches that can lead to prosecutions.

If the FCNSW can't be trusted to implement the legislative requirements of the current RFA and need to be overseen by another government body then something is seriously wrong. And if that policing body, the EPA is so underfunded that it can only monitor a tiny fraction of the harvesting operations underway at any one time then logically we cannot trust the FCNSW to properly follow any new RFA.

So for any new RFA to have any hint of credibility it must address this basic issue of a weak compliance regime within the sector.

Welcome community involvement

In order to assist the EPA in its mammoth task the community must be empowered to monitor harvesting operations. Indeed it is only through careful observation and research by locals in my area that endangered wildlife were located and felled hollow bearing trees discovered and documented. There are many ways for FCNSW to include the community pre and post logging. One of many changes I would recommend is that **the FCNSW routinely publish the map layer that identifies the location of every Habitat and Recruitment tree in the compartment to be logged.** This could be added as an amendment to the Harvest Plan published on line.

More time for FCNSW ecologists to survey pre and post logging

As it is the FCNSW ecologists are given the thankless task of looking for wildlife on a hopelessly limited budget of hours per hectare. It’s no wonder we can’t be confident that the current surveys are a comprehensive or accurate indication of the density of various species esp. threatened ones. I propose that as a bare minimum **1 person hour of surveying be allocated per 5 hectares** of gross forest area. Another innovation would be for FCNSW to make use of engaged and enthusiastic locals to help in the pre logging faunal surveys.

Wombats

The Glenbog wombat protocol was implemented last year in Mogo SF at the insistence of the community when burrows were found by the public **after** the ecologist had finished her survey. I propose that this protocol be implemented immediately once FC staff or contractors discover burrows in the area of operations. It shouldn’t exclusively be up to the public to find the wombats and pressure FCNSW before the protocol is applied.

Ridge and Headwater Habitat

Section 5.8 of the TSL states that:

- a) For every 500 hectares of areas within the South Coast Sub-region as identified in Clause 4 of this approval, FCNSW must implement:
 - i. a minimum of two exclusion zones at least 40 metres wide which connect second order streams; or
 - ii. a minimum of one exclusion zone at least 80 metres wide which connects third order streams.

This 500 hectares is far too large an area to have only one corridor allocated to it for faunal egress out of the area of operation. To create a much higher rate of native animal survival of harvesting operations I recommend Section 5.8 be amended to ensure the same exclusion zones for every **200 hectares.**

.....

I confirm that my submission does not contain sensitive information and can be published in full on the Environment Protection Authority and/or the Department of Primary Industries website.

I understand that the Environment Protection Authority, Department of Primary Industries and/or the independent reviewer may contact me about my submission.