



CLARENCE ENVIRONMENT CENTRE

31 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 1863

Web site: www.cec.org.au

E-mail: admin@cec.org.au

decforestry@environment.nsw.gov.au

Glenugie State Forest Audit Compartment

23rd August 2012

Glenugie State Forest, bordering the the western side of the Pacific Highway some 12km south of Grafton, has had a long history of logging, cattle grazing, high frequency burning, and past logging practices that removed unmerchantable trees and species. As a result, there is only a sparse understorey, with relatively low levels of biodiversity.

Nevertheless, the harvest plan (No.2225) did identify a possible Endangered Ecological Community (EEC), “indicative floodplain morphology”, and a rare plant species, *Cryptandra longistaminea*, growing there. All were accurately marked on the plan's map, with the unusual step of including photographs and full description, and there seemed little damage would result from the logging that was planned for earlier this year. Following the logging the Clarence Environment Centre undertook a half day survey on 23rd August 2012'



200m from the Old Pacific Highway, and 100m from the southern boundary. The gully is not mapped and therefore not recognised as a breach.

Within minutes of starting the survey, a logged gully line with clearly defined banks was found. The gully is not mapped, but the harvest plan requires “best management practices” to be followed. Logging within a metre and a half from the defined gully would hardly comply with best management practice.

Also discovered was the usual range of breaches and sloppy marking-up of hollow-bearing and recruitment trees (“H” & “R” trees).

The densest assemblage of marked H and R trees occurred along the southern boundary, so we surveyed that 750 metre stretch to a width of 100m, a total of 7.5 hectares. Allowing one hectare for a gully exclusion zone, the remaining 6.5 hectares should, if Forests NSW had complied with the required retention rates of 10 of each per 2 hectares, have contained 65 marked R and H trees.

As it was we found only 13 H trees and 19 R trees, a total of 32, 50% of what should have been retained. Another random 2 hectare transect running north-south was also surveyed, where only 7 H trees and 5 R trees were counted, where there should have been 10 of each; again around half the required number.

According to the Integrated Forests Operations Approval, “R” trees: **“... must show potential for developing into hollow-bearing trees. Retained recruitment trees must have good crown development and should have minimal butt damage and should not be suppressed. Mature and late mature trees must be retained as recruitment trees where they are available”.**

Very few of the retained R trees are mature, with the majority being less than 50cm diameter, while at the same time we observed large numbers of more mature trees that were commonly greater than 60cm diameter, which had been logged; so mature trees were certainly available prior to logging.

Of greater concern was the quality of the trees retained. The underlined passage above clearly spells out the requirements for R trees, yet these are some examples of what we found:



The cores of the two R trees pictured above were dead, and highly vulnerable to fire which in some cases, as shown at left, would have been greatly facilitated by the failure to remove logging debris from around the tree base – a requirement under Forests NSW's Threatened Species Licence. The crown of the tree, at right, is a joke!

Examples of the selection of trees that are barely greater than saplings, where mature trees have been logged, were found everywhere.

The picture below shows the stump of a mature tree in the foreground measuring 70cm diameter at the cut. An Ironbark H tree in the background is accompanied on the right by a Spotted Gum “R” tree that measured less than 40cm diameter.



The crown of the logged tree had been moved 30 metres away, but displayed characteristics of old growth (spreading limbs), and there were numerous small hollows among the limbs (see below).



An obvious check point is the rare plant population, *Cryptandra longistaminea*, which, as already stated, was identified on the harvest plan's maps, along with photographs and description. However, as far as we are aware, the species is not a listed threatened species, although a small population in the area had been listed as an endangered population. Therefore, there is no official protection under any Act.

In the field we found the marking up was faultless. A clear marking of "STOP" on a tree approximately 50m from the population (see at right) should have had some effect. If that did not work, a further marking of a tree with the letters "RP" (rare plant), and red flagging tape tied to several individual plants, should have ensured the colony's protection.

However, that was not to be, a harvesting machine has trundled past both signs, trampling plants in the process, and cut down two Spotted Gums, one of which had 4 of the *Cryptandra* plants growing within a metre of its base, and then pushing the crowns around, destroying even more of the rare plants.





Flagging tape tied to a *Cryptandra* shrub.



Dead vegetation trampled by logging machines.

The fact that the “RP” sign is immediately alongside the tracks made by the harvesting machine suggests that either the machine operator intentionally trampled the plants, or the mark-up was done later.

There were no other “RP” notices, so it certainly raises the question – which came first, the logging or the mark-up? Certainly marking-up after the event has been recorded by environmentalists in previous audits.



A logged stump with a young surviving *Cryptandra* in the foreground.

It should be noted that the above observations took less than 4 man hours, so a comprehensive audit would doubtless result in many more unacceptable practices being uncovered.

We believe there is probably little point in the EPA investigating these issues, as past experience has taught us that action being taken against those responsible is highly unlikely.

However, we would appreciate this report being placed on record in order to add to the data base of systemic breaching of Forests NSW's Threatened Species Licence that has been going on for years. In the event of a future prosecution, this report could be used to provide evidence that the agency is a serial offender.

Yours sincerely
John Edwards
Honorary Secretary
Clarence Environment Centre