

Failure to deal with the impacts of the 2019/20 fires on State forests.

Dailan Pugh, North East Forest Alliance, November 2021.



Natural Resources Commission's (NRC) report 'Final report Coastal IFOA operations post 2019/20 wildfires, June 2021' was recently leaked to the media. The NRC recommendations were prepared with the Forestry Corporation (FCNSW) to minimise impact on the industry, and are grossly inadequate to mitigate the cumulative impacts of logging and fire on forests, species and streams. The FCNSW are refusing to implement them, and the Government is refusing to make them.

The NRC assessed that continuing to log in 3 Management Areas, including Taree, would likely cause *irreversible harm*, recommending that logging be excluded for 3 years after the fires. Two years after the fires and five months after the recommendation was made, FCNSW are currently logging in in the Taree MA, with more operations scheduled to start in February.

In response to the loss of hollow-bearing trees in the fires the only change the NRC proposed to the logging rules was to restore minimum numbers of hollow-bearing trees in logged forests and retain recruitment trees as the hollow-bearing trees of the future. This too FCNSW are refusing to implement.

It is reprehensible and grossly irresponsible that the Ministers for Environment and Forestry, Matt Kean and Paul Toole, have refused for the past 5 months to require compliance with the minimal changes recommended by the NRC to reduce the impacts of the 2019/20 wildfires on public State forests. It is literally the least they could do.

In 2019/20 NSW suffered record drought and extreme fire conditions, from August 2019 until February 2020 wildfires burnt around 5 million hectares of public and private land across the coastal regions of NSW, including 64% of native State forests. The ecological impacts were severe, [billions of animals were killed](#), four animal and 61 plant species had [more than 80 percent of their known localities](#) impacted, and ecological carrying capacity was halved.

Heavy rainfall in January and February 2020 following the wildfires resulted in extensive erosion of soil and ash into streams, causing [fish kills in the hundreds or thousands](#), extending down to the estuaries of some rivers, such as the Macleay.

Based on scientific advice of the significant impact of the fires, in early 2020 the Environment Protection Authority (EPA) and Forestry Corporation (FCNSW) negotiated Site Specific Operational Conditions to apply in addition to the standard logging rules (CIFOA) in burnt forests. These

included temporary retention of unburned or lightly burned forest and increased exclusions, protection of all hollow-bearing trees, 10m buffers around rainforest, and increases of buffers around headwater streams from 5m to 20m.

The EPA commissioned [Dr. Andrew Smith to undertake a review](#), who found that the standard logging conditions fail to guarantee ecologically sustainable forest management and are likely to cause an ongoing decline and significant impact on biodiversity, primarily due to the increased logging intensity they allow and inadequate exclusions. He considered that the EPA's Site Specific Operational Conditions would only be effective if made permanent, commenting:

The time required for recovery of threatened and sensitive species after average fires ranges from around 10 - 120 years. Recovery times are likely to be around 10 years for the Hastings River Mouse, up to 45 years for the Koala and 20-120 years for the Greater Glider and Yellow-bellied Glider ... An examination of case studies indicates that protection of unburnt and lightly burnt areas could mitigate logging impacts in burnt landscapes if it was made permanent (or longer than 20-120 years) and extended to protect a minimum 50% of the least burnt area of forest in each compartment across the entire landscape.

In February 2021 FCNSW told the EPA they no longer intended to apply the additional rules on the south coast and would instead apply their own voluntary, legally unenforceable, modifications.

To resolve the dispute the Government directed the Natural Resources Commission (NRC) to report on adjustments to logging of State forests in response to 2019/20 wildfires. In June they finalised their report, the Government then sat on it until it was leaked to The Guardian in late November.

The NRC engaged [University of Wollongong](#) to undertake an assessment of the impacts of the 2019/20 wildfires on NSW Regional Forest Agreement (RFA) areas. They cited findings that 59 to 91 percent of the 700 listed threatened plant species in NSW had some part of their range burnt, about 5 percent having > 90 of their range burnt, and 411 out of 1600 threatened and/or endemic plant species in NSW are now at high risk. Within the RFA regions they identified particular concern for the burning of up to 40% of rainforests, and moist riparian habitats important for refugia and erosion control. Because of the increase in fire frequency they identified more than half of the forests at risk of a potential decline in plant diversity if disturbed again within the next 5-10 years. They conclude:

These changes to fire regimes, wrought by the 2019/20 fires, were likely to pose significant risks to the CIFOA objectives and outcomes. Importantly the magnitude of the fires and their effect on disturbance regimes have placed the CIFOA, generally, in a highly vulnerable state where risk may be maintained at an elevated level into the immediate future. In particular, the integrity of riparian buffers, regeneration, hollows and carbon stocks may have been negatively directly affected by the 2019/20 fires and resultant changes to disturbance regimes.

The [University of Wollongong](#) study assessed impacts on 25 animal species in the RFA regions using habitat models, finding about 27-62% of predicted suitable habitat burnt in the 2019/20 fires, with about half this burnt at the highest levels of severity. Koalas had about 40% of their modelled habitat burnt, 17% at high and extreme fire severity. They conclude:

While the overall proportion of the area of harvested predicted habitat burned in 2019/20 within the forested portion of the CIFOA domain was relatively low (< 7 percent), compounding effects of these disturbances may have been acute. Given the size of the fires, their overlay across dispersed pockets of recent harvesting may have diminished connectivity of suitable potential habitat in the short term.

The study also assessed future impacts of climate change scenarios on fires and the modelled distribution of 24 fauna species, identifying 14 animal species affected by the fires that are also likely to suffer significant declines in predicted climatically suitable habitat under future climate heating scenarios by 2030, with 8 species potentially losing over half their suitable habitat by then. This makes them even more vulnerable to fires and logging over the next decade. They conclude:

under a hotter and possibly drier future risks to the integrity of forests are likely to be directly and indirectly elevated (i.e. through changed fire regimes). Whether or not such changes are incremental or sudden, as wrought by the 2019/20 fire season, there remains a strong likelihood that change will be rapid.

For their part [FCNSW estimated](#) significant losses of trees in heavily burnt forests, particularly on the south coast. On the north coast in 62,100 ha affected by crown fires all trees less than 30cm diameter were killed and half those over 30cm, increasing to 90% of trees killed in forests logged within the past 4 years. Losses halved in the 82,400 ha subject to hot burns.

The NRC identify the standard logging rules (CIFOA) “*was not designed to mitigate the risks of harvesting in severely fire-affected landscapes like those from the 2019/20 wildfires*”. Rather than revising the logging prescriptions, the NRC’s general approach was to require increased retention of unburnt and partially burnt forests for 3 years post fire, according to the assessed risk on a broad Management Area (MA) basis.

The NRC report was prepared with FCNSW and handed to the Government in June. In full knowledge they were likely causing *irreversible harm*, FCNSW has since failed to implement its recommendations, presumably in the knowledge that the Government would do nothing.

The NRC identify 3 Management Areas (MAs), Narooma and Nowra on the south coast, Taree on the north coast, with “*risk of serious and irreversible harm to environmental values from the cumulative impacts of fire and harvesting*” where “*harvesting must be temporarily suspended for three years from the time of fire*”.

On 26 July FCNSW started logging 1,187ha of Yarratt State Forest (SF) in the Taree MA, and are currently preparing plans to log 1,211 ha of the balance of Yarratt, and start logging in Kiwarra SF, in February. On the south coast they are proposing 3 operations in the Narooma MA, in Wandella and Bodalla SFs.

The fires began on the north coast in August 2019, the 3 years allowed for recovery ends next year. An immediate response was required.

The NRC identify 6 MAs (2 on the north coast) where 75% of a Local Landscape Area (a group of compartments) is required to be protected until 2023, though this still allows individual compartments to be logged as usual, as they are.

In NSW there are 46 mammals, 81 birds, 31 reptiles and 16 frogs reliant on the hollows provided by old trees. The current logging rules require the retention of up to 8 hollow bearing trees per hectare where they remain. A natural forest can have 13–27 hollow-bearing trees per hectare. In coastal forests FCNSW have already got rid of most.

In recognition of the massive loss of hollow-bearing trees in the fires and following logging, the only change to the logging rules proposed by the NRC was to require the retention of the next largest trees where enough hollow-bearing trees don’t exist (as in most coastal forests) to achieve 8 trees, and for each hollow-bearing tree 2 of the next largest trees as ‘recruitment’ trees to develop into the hollow bearing trees of the future. This is a distinct improvement.

If we want to save the plethora of hollow-dependant animals it is essential that at the least we restore this minimum and ensure there are big mature trees ready to replace the remaining hollow-bearing trees when they are killed.

FCNSW are refusing to implement the NRC's single change to the logging prescriptions. For example, the logging plan for Cherry Tree SF was approved in September and only requires for hollow-bearing trees "*8 per ha must be retained where available*". No restoration to a minimum of 8 and no recruitment trees.

It is of particular concern that NRC removed the EPA's rainforest buffers and increased stream buffers, did not require increased protection for the 14 affected animal species also likely declining because of climate heating, and did not require pre-logging surveys and protection for the threatened and/or endemic plant species identified at high risk.

The NRC recognised "*there is an increasing likelihood of more severe droughts and more extreme fire weather in the future*", meaning the area of forests "*exposed to high frequency and high intensity wildfires is likely to increase substantially*".

The CSIRO found [fire frequency and extent are increasing](#) due to climate heating, meaning that intense wildfires are an increasing threat to forestry and forest ecosystems. They summarise:

Burned area in Australia's forests shows a linear positive annual trend but an exponential increase during autumn and winter. The mean number of years since the last fire has decreased consecutively in each of the past four decades, while the frequency of forest megafire years (>1 Mha burned) has markedly increased since 2000.

We are in a dangerous feedback loop where [logging](#) is fuelling more intense fires. With extreme fire weather increasing we need to break out of this vicious cycle while we still can. Stopping logging and allowing current regrowth to mature beyond 40 years will significantly help.

It is evident that the Forestry Corporation cannot be trusted to do the right thing, and the NRC are little help. If we want to save our public native forests and their wildlife we need to stop compounding the escalating threat by stopping logging them.



A Koala victim of the 2019 fires.