## NORTH EAST FOREST ALLIANCE



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10 January 2022

The Hon. James Griffin Minister for Environment office@griffin.minister.nsw.gov.au

Dear Minister,

As follow up to my letter to you of 3 January 2022, yesterday I undertook a brief 3 hour walk through the unburnt/lightly burnt area of Camira State Forest that the Forestry Corporation should have put aside as a Fire Offset if they were being 'fair dinkum' about implementing the NRC recommendations.

I identified 28 trees with distinctive Koala scratches, which displayed long term use both pre and post fire. Most Grey Gum and many Red Gum appeared to have been used, though scratches were not always distinctive as both new bark and Red Gums do not scratch as easily as old Grey Gum bark. Koala scats were located under 7 of these trees, with 18-27 scats found under 3 trees, though searching was time consuming and limited due the dense understorey, shed bark and rapid disintegration of scats in the wet conditions.



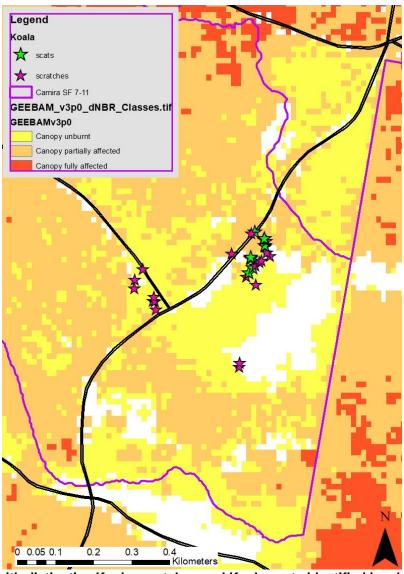
Koala scratches were identified on 28 trees, with Koala scats identified under 7 of them, in a brief search of part of Camira SF on Sunday.

Usage was most pronounced in an unburnt/lightly burnt patch dominated by Grey Gum and Red Gum with a scattering of Grey Box, reinforcing Koala's preferences for both Grey Gum and varied feed species, and the likelihood that this unburnt/lightly burnt stand is a very significant Koala fire refuge.

Koala use trees identified varied from 22-86 cm diameter (dbhob), with an average size of 56 cm dbhob. Of these 21 (75%) are in the range 47-76 cm dbhob (usually without obvious hollows) which is the size class targeted for large high quality sawlogs. The harvesting plan states "target the"

removal of HQL size class trees (>48cm DBH) and trees exhibiting defect" and "target the removal of all merchantable stems". There are no requirements to retain mature nectar feed trees, and only 5 small (>20cm) Koala feed trees need to be retained per hectare, meaning the only mature trees that need to be retained are hollow-bearing trees (which are below the threshold of 8 per ha) and undefined replacement hollow-bearing trees (to increase retention to 8). Of course if they happen to see a Koala in a tree they have to wait until it flees in panic before they can cut it down.

This mature size class comprise the trees that would be required to be selected for replacement and recruitment hollow-bearing trees if the NRC recommendations were implemented (and if recruitment trees were defined as large mature trees). With recruitment hollow-bearing trees alone requiring retention of 16 mature trees per ha this would significantly increase retention of larger mature Koala feed trees, all of which could otherwise be logged.



Locations of trees with distinctive Koala scratches and Koala scats identified in a brief 3 hour search of the unburnt/lightly burnt area (white and yellow) of compartments 7-11 of Camira SF on 9 January 2022.

The total area of compartments 7-11 of Camira SF is 1,254 ha, of this (outside the dam) only 9 ha escaped burning and 42 ha had no significant loss of canopy. This 4% of the forest is a significant fire refugia of the utmost importance in maintaining fire-sensitive species and ecological processes, as source areas for the rest of the forest. NEFA's brief assessment has proven that it is an important

source area for Koalas. It is thus outrageous that instead of protecting this patch of forest of outstanding importance, the Forestry Corporation protected those parts most degraded by logging and intense fire as Fire Offsets. **Why have you allowed them to do this?** 

Minister, NEFA reiterates our request to you to immediately direct the Forestry Corporation to comply with the NRC recommendations as identified in the 7 points raised in our letter to you of 3 January 2022. We suggest you task the EPA with ensuring the Forestry Corporation does comply with the letter and intent of your directions, and that prescriptions are ecologically based and legally enforceable. Please inform us as to what action you are taking.

NEFA finds it extraordinary that we have to spend our time reviewing Forestry Corporation's harvesting plans and rorted exclusion areas, while also trying to identify Koala refugia, because the Government can't be bothered doing so. The Forestry Corporation have proven time and time again that they can't be trusted, and the EPA will only pursue legal breaches. What this case reinforces is an urgent need for independent assessments by trained ecologists to identify required logging exclusions.

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Dailan Pugh OAM, for the North East Forest Alliance.