



## **The Folly of Logging on Steep Erodible Slopes**

### **NEFA BACKGROUND PAPER**

#### **The Folly of Logging on Steep Erodible Slopes, 2 Case Studies.**

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There have been two significant past events within the area now proposed for logging on highly erodible steep slopes by the Forestry Corporation. As an outcome of these events logging was excluded from the steepest and most highly erodible and unstable slopes throughout NSW. It is outrageous that the NSW Government is now intending to allow the Forestry Corporation to resume logging in such extreme risk areas.

In 1989 Justice Hemmings found that logging on slopes over 25° in part of Mistake SF was likely to have significant environmental impacts and restrained the Forestry Commission from logging on such slopes until they prepared an Environment Impact Statement. In 1992 Justice Hemming's concerns were proved to be well founded when a relatively small operation in part of Oaks SF resulted in over 88,000 tonnes of soil being eroded into the headwaters of the Bellinger River. It was this later case that established the need for licensing of Forestry Commission's logging operations. Parts of these sites are now protected in national parks, though they emphasise the real and extreme risks of allowing logging on the steep slopes in this region.

In Bailey vs Forestry Commission of NSW Justice Hemmings (1989) found that logging on slopes over 25° in Mistake State Forest was likely to have a significant environmental impact and must be stopped until an Environmental Impact Statement was prepared, stating:

*... I am satisfied that the proposed logging operations of the Forestry Commission and the contractors must be likely to pose a substantial threat to landscape stability*

*in the subject area in the longer term. This is a consequence of the potential in this area for rains of high intensity, duration and prevalence on land which has long slopes in the elevated parts of the catchment, and which are potentially readily reactivated, erosion prone drainage systems.*

*... in the up river forest where the surface soil was removed and the sub-soil exposed it must be likely to be highly erodable, particularly as a result of logging and tracks on slopes over twenty-five degrees. The Standard Erosion Mitigation Conditions imposed on the operations by the Forestry Commission are likely to be unsuitable guidelines for erosion control in the steeper catchments in the Mistake State Forest. ...even if the Standard Erosion Mitigation Conditions were conscientiously applied, it was very doubtful whether they would hold such exposed soils and prevent the formation of gullies and continuing generalised erosion.*

*... I consider that the most serious matter is the likelihood of soil erodability in steep country ...*

In April 1992 the North East Forest Alliance blockaded a logging operation at Mount Killekrankie (Oakes SF) in the New England Wilderness to halt horrendous logging and roadworks that were causing massive erosion and pollution of the Bellinger River. CaLM (1992) investigated the complaints for the Forestry Corporation and found numerous violations of the Standard Erosion Mitigation Conditions, including 26 incursions into streamside protection areas, pushing of soils into watercourses, unmapped drainage lines “did not obtain special protection”, logging occurred on mapped “steep slideslopes”, 86 required cross banks were not constructed, 179 cross banks were inadequate or failed, snig track grades were exceeded on 82 readings, snig tracks were constructed on side slopes in excess of 30° on 220 occasions, and a log dump was constructed in a drainage line (to name just a few). CaLM (1992) noted:

*In total this represents an estimated 88,140 tons of soil lost from the batters and tracks of these compartments. If it was necessary to carry that tonnage out of the forest in trucks it would take 8,814 loads or at one truck per hour over a 40 hour week it would take over 7 months to remove that volume of fill.*

As has been found on innumerable occasions, CaLM also found that part of the problem is that neither the contractors nor the Forestry Commission implemented the legal requirements, noting:

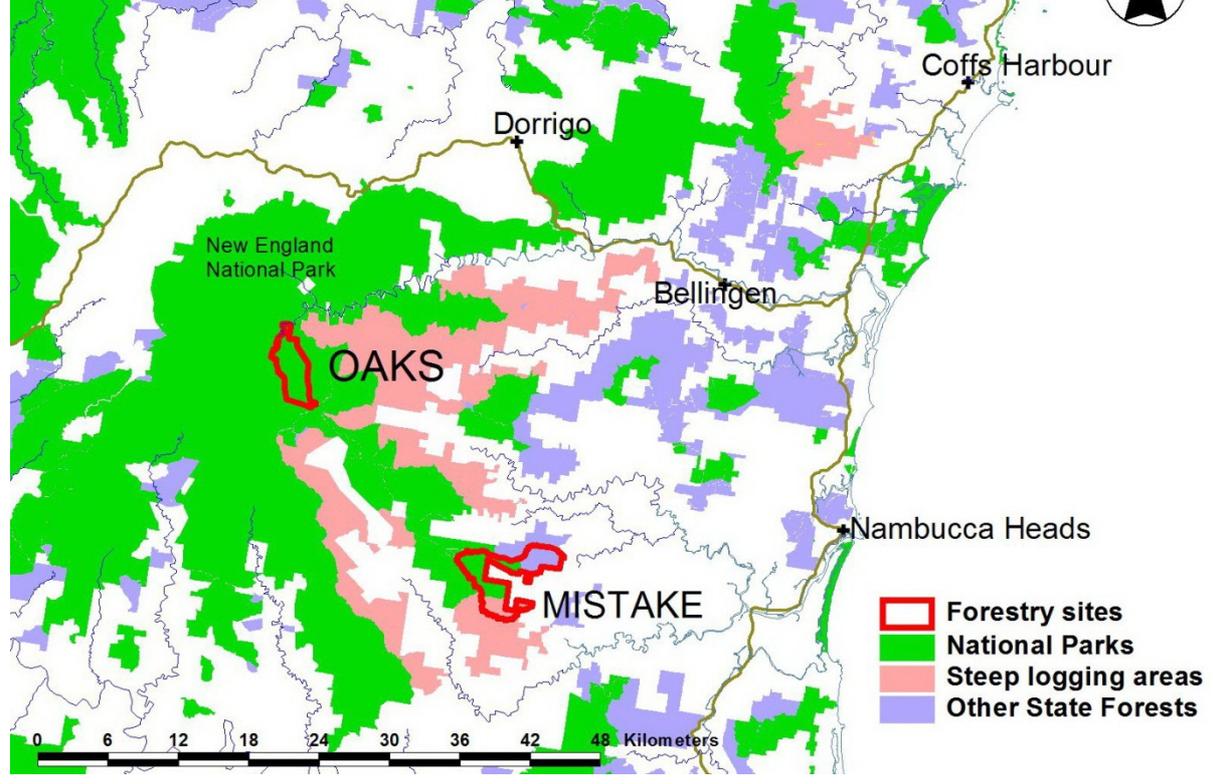
*It was apparent that the operator had no understanding of the standards with which he was obliged to comply.*

*The supervisor, likewise*

- had no understanding; or*
- did not check or see the operation; or*
- if he did understand, was not prepared to enforce the conditions.*

The Forestry Commission was charged by the EPA with an offence of polluting waters contrary to s 16 of the *Clean Waters Act 1970*, and while the offence was proven no conviction was entered against the Forestry Commission. This case did prove the need for legally enforceable prescriptions for forestry and did result in the application of Pollution Control Licences to Forestry Commission's operations throughout NSW.

# Steep Land Logging Proposal and Experience



Department of Conservation and Land Management (1992) Soil Conservation Issues  
Compartments 168-170 Oakes State Forest. Prepared for the Forestry Commission of NSW.