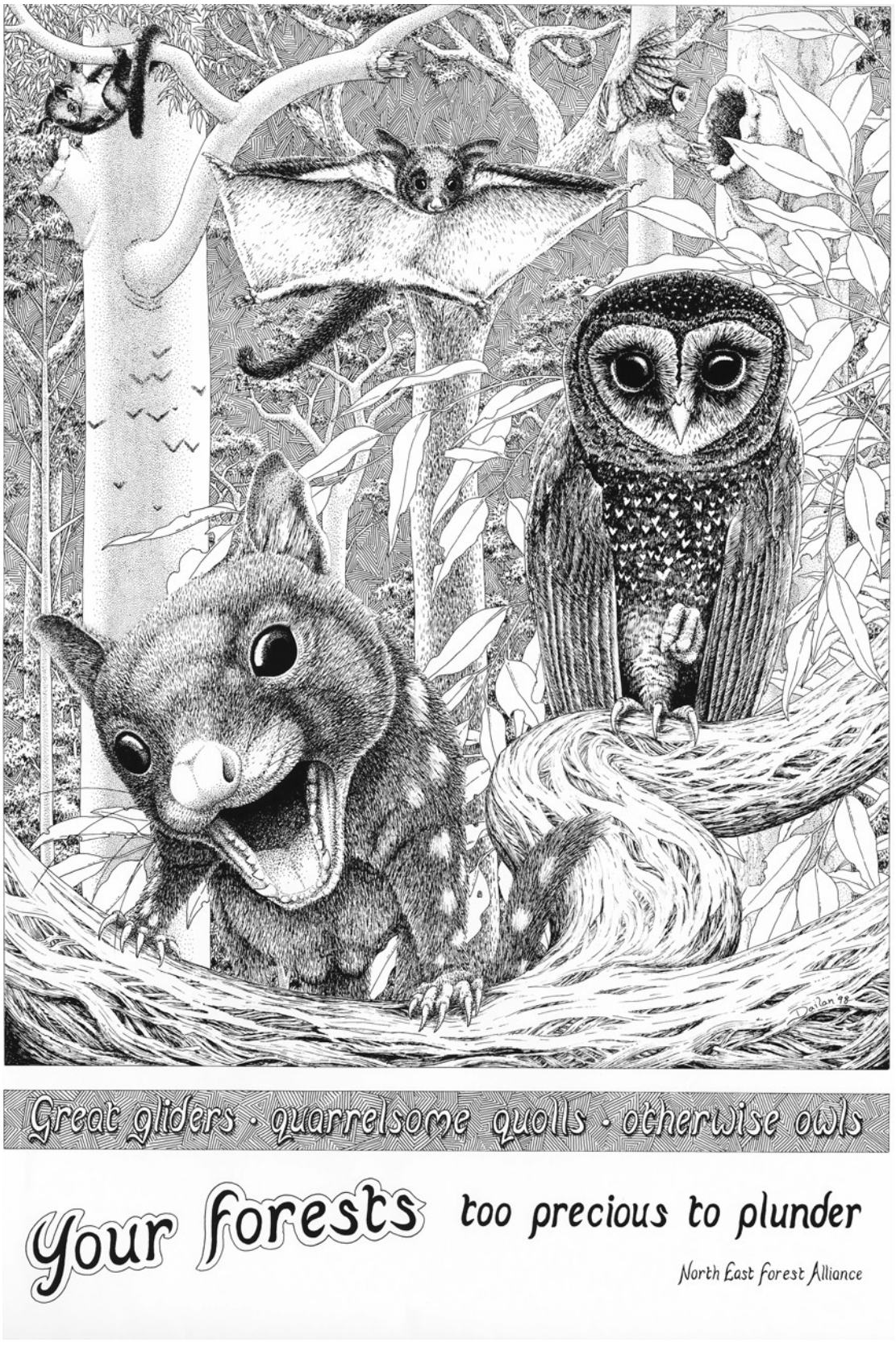
The Battle to Protect Threatened Species



NEFA BACKGROUND PAPER
The Battle to Protect Threatened Species
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The current Threatened Species Licence evolved through a lengthy process. NEFA's campaigns for rainforest and oldgrowth have been strongly based on their exceptional flora and fauna values. NEFA battled hard to get the plight of our native species recognised , viable populations incorporated into the reserve system, and limits applied to reduce the impacts of logging on them outside the reserve system. The Forestry Corporation have fought every step of the way, while at the same time proving the need for external regulation of their activities.

Following a major campaign by environment groups to stop rainforest logging, on 26 October 1982 the Government of Premier Wran made its historic 'Rainforest Decision', with decisions on Barrington Tops and Werrikimbe being deferred until 1984. The end result was 118,000ha being transferred to National Parks and 1,800 hectares to flora reserves. The intent of the Rainforest Decision was to phase out rainforest logging by 1990.

In 1989 NEFA had a blockade to stop rainforest logging in North Washpool. It transpired that the Forestry Corporation had failed to undertake the archaeological investigations required by the 1980 EIS and the road was being pushed through significant Aboriginal sites The roading was thus illegal. Logging and roading activities were suspended in North Washpool to enable assessment of areas of Aboriginal significance and consideration of the Wilderness nomination that had been made. The assessment showed that there were many significant Aboriginal sites in the Desert Creek valley, with some having been severely damaged. A 1,000 hectare Aboriginal Place was subsequently identified for protection and in 1990 the Forestry Corporation attempted to resume logging. NEFA immediately established another blockade to buy us time to seek a legal injunction.

In October 1990 our case was heard in the Land and Environment Court. NEFA presented evidence that they were logging stands that had been expressly protected in the EIS, logging compartments they had not prepared the required harvesting plans for, logging well in excess of the 50% canopy retention required by the EIS, not retaining buffers free from logging along roads as required by the EIS, and not implementing the required erosion mitigation conditions.

In his judgement on 29 October (Corkill vs Forestry Commission of NSW, 1990) granting an injunction preventing further works in North Washpool Justice Hemmings commented:

> *However, it is obvious that since 1982 the Commission has approved logging of rainforest areas in North Washpool in breach of the provisions of the E.P.&A.Act. . It was ultimately conceded by Counsel for the Commission that all rainforest areas of North Washpool were expressly excluded from areas to be logged in the 1980 environmental impact statement. When logging was approved in December 1982, it was limited to the strategies and prescriptions in the said environmental impact statement. Notwithstanding such express exclusion, the Commission authorised rainforest logging within North Washpool. I am satisfied that, until the institution of these proceedings, it was the intention of the Commission to authorise such logging in rainforest areas to resume.*

In my opinion, the lawfulness of approvals to log rainforest areas which were expressly excluded from the only environmental impact statement prepared for the North Washpool area is a most serious matter for determination at the final hearing. I have no hesitation in determining that there are a number of serious issues raised in these proceedings as to the lawfulness not only of the 1990 approval to resume and subsequent harvesting plan, but also of the previous decisions upon which they were based. I am of the opinion that, subject to the exercise of the Court's discretion, such activities should be restrained pending further orders.

... Regrettably, there is conceded to be a history of departure by the Commission from not only its own approvals in the logging of this area, but apparently a continuous avoidance of the obligations imposed by the E.P.&A.Act. In such circumstances, it is difficult to have confidence that, unless restrained, the Commission will observe its statutory duties.

The Forestry Commission had illegally logged 200ha of rainforest. In order to avoid a final judgement, in April 1991 the Forestry Commission agreed to the North Washpool Agreement which was to establish 2 expert committees to oversee rehabilitation of areas of soil erosion and logged rainforest. Logging of rainforest, as mapped, was finally stopped, and rehabilitation begun.

In 1990 NEFA held a blockade to stop logging of oldgrowth forest at Chaelundi in the Guy Fawkes River Wilderness. This was part of a concerted campaign by NEFA to ensure Environment Impact Statements were prepared before oldgrowth forest could be logged. A concurrent court case (Corkill vs Forestry Commission of NSW) established that an EIS was required before this oldgrowth could be logged, and the Land and Environment Court. granted an injunction to stop the logging. This became a major political issue. On the 24 June 1990 Premier Greiner launched 'Meeting the Environmental Challenge: A Forestry Strategy', which was an undertaking to prepare Environmental Impact Statements (EISs) for some 180,000 ha of forest before it could be logged.

The EISs were to be carried out progressively over the next five years A roughly drawn map accompanied the document which indicated the areas. The Forestry Commission omitted enough old growth forest to maintain supplies to industry while the E.I.S.'s were being prepared. Premier Greiner's announcement included commitments for the adoption of a variety of basic forestry principles which included decision making based on a comprehensive information base, ecologically sustainable management, economically viable and efficient forestry, balanced and open decision making, and publically accountable management. Unfortunately these were hollow promises

After the Forestry Corporation had prepared a shoddy EIS for part of Chaelundi, NEFA re-established a blockade in 1991. During that blockade John Corkill, on behalf of NEFA, launched an application in the court alleging breach of ss 98 & 99 of the National Parks and Wildlife Act 1974 seeking declaratory and injunctive relief. The case was that the forestry operations would inevitably include the 'taking or killing' of listed endangered fauna without a licence and contrary to the law.

Since 1974 section 99 of NPWAct made it an offence to take on kill any endangered fauna. Based on reams of the Forestry Corporations own documents, and abundant expert opinion, Justice Stein (1991) found that, even with wide riparian exclusions and 50% canopy

retention, roading and logging would take or kill 22 endangered and protected species, commenting:

> *Imminent breaches of s.99 and also s.99 of the NPWA, have been proven in relation to a large range of endangered and protected species of fauna. This is not surprising given the extraordinary wildlife values of the compartments. The high species diversity of arboreal marsupials and the presence of numerous significant species listed in Schedule 12 of the NPWAct makes it a veritable forest dependent zoo, probably unparalleled in south-eastern Australia. Every species of forest dependent marsupial is present. It contains prime or critical habitat for numerous species of endangered fauna or "faunal hot spots". Special pleading for individual areas as exhibiting particular value relating to flora or fauna is not uncommon. However, the evidence before me is overwhelming that this portion of forest is significantly unique in Australia for its natural wildlife values."*
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> *Disturbance and injury to many individual animals and their species by the forestry prescriptions (given the best will in the world by the Forestry Commission officers) is in some cases highly likely if not inevitable. The faunal or wildlife corridors provided in the harvesting plans are at least a temporary refuge for fauna able to escape the forestry activities. They are long and narrow, some dead end and they provide at best only remnant habitats incapable of supporting large populations. While containing some hardwood they are predominately rainforest. This affects their habitat suitability for animals.*
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> *The additional prescriptions – including 50% canopy retention, tree marking and fauna observations – can do no more than mitigate the disturbances to the endangered and protected fauna. Reduced populations of endangered species – some classified as Vulnerable and Rare, some Threatened and one in Imminent Danger of Extinction – are likely to occur. Predators will inevitably increase and the prime habitat for many species will be lost.*
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> *The unique wildlife values of the area will be destroyed as larger populations become fragmented into small comparatively isolated groups. The present abundance and diversity of unique and endangered wildlife will likely be severely eroded. Disturbance of fauna in the indirect sense as opposed to direct injury, interference or death, is just as dangerous to the future of the species. In so far as it has an impact which destroys habitat the forestry operations will likely disturb essential aspects of continuity of a species – especially breeding, feeding, nesting and social interaction. The proposed forestry prescriptions, even assuming a great deal of skill and care by Commission officers and the loggers, will spell the death knell of the "truly exceptional" wildlife values of these compartments of the Chaelundi State Forest.*

As an outcome of the political furore that resulted, on December 5 Shadow Environment Minister Pam Allan introduced the Endangered Fauna (Interim Protection) Bill into Parliament. On December 12 the Endangered Fauna (Interim Protection) Act 1991 passed the NSW Parliament and became law.

The National Parks and Wildlife Service issued licences to the Forestry Corporation in February 1992 as part of a mass temporary licensing operation for the whole of NSW under section 120 of the *National Parks and Wildlife Act* 1974. These licences were issued on a

management area basis during the concerted attack on the Endangered Fauna (Interim Protection) Act and prior to its licensing provisions coming into full force.

The licences were only meant to last 120 days as a temporary measure until the NPWS managed to get a more responsible licensing process together. They were issued for over a thousand compartments that the Forestry Corporation maintained they then had to log in the next few months. While initially the National Parks and Wildlife Service insisted that the Forestry Corporation certify that all compartments had complied with the EPA Act, they soon had to cave into the pressure to licence all compartments submitted. There was no assessment of the compartments by the NPWS and only a few token conditions put on all the licences.

The State Government and timber industry used a contrived crisis over the Endangered Fauna (Interim Protection) Act to get the ill-conceived Timber Industry (Interim Protection) Act through parliament. It had nothing to do with endangered fauna, It required EISs to be prepared for whole Forestry Commission Management Areas, prevented the application of stop work orders by the Environment Minister, and made the Minister for Planning the determining authority. The catch was that all areas outside the moratorium areas could be logged and cleared in the interim without EISs. The Act specified a schedule for completion of EIS's for 21 management areas, with the last one due in September 1994, and most provisions of the Act expiring in December 1994.

Once again the Forestry Corporation had found a way of rorting the system to be excluded from the requirements of environmental law. The NPW Act Section 120 licences were termed "lollypop licences" by the NPWS. These licences were then repeatedly renewed with no further assessment. An administrative process was eventually established where individual compartments were added to the licence, by way of a licence variation. Rarely approval to log compartments was withheld.

The Forestry Corporation was required to prepare Fauna Impact Statements as part of their preparation of Environmental Impact Statements, the intent was to issue licences in accordance with the Endangered Fauna (Interim Protection) Act as an outcome of that process.

Five of these Management Area EISs were completed before the Government was forced to abandon the intended process. One was refused by the Minister for Planning as failing to meet the legal requirements (Mt. Royal), three should have been refused but were determined by the Minister with numerous conditions (Wingham, Glen Innes, Kempsey-Wauchope), and one was hastily withdrawn by the Forestry Corporation when they learned that the DoP was in the process of refusing it (Drielsma withdrew it after Kibble had already signed a letter to Webster stating it should be refused) – prompted by legal action commenced by NEFA (Dorrigo).

Only one of the seven forestry FISs prepared for north-east NSW was determined by the Director General of the National Parks and Wildlife Service (NPWS) (Wingham), 17 months after it went on public exhibition. Politcal interference prevailed to force the NPWS to determine an FIS they considered "*inadequate in almost every respect*" (Stein 1993) in south-east NSW, and this appears to be the case with Wingham . NPWS submissions made it clear that they held the same poor view of FISs in north-east NSW, but were unable to

refuse them for political reasons or determine them for fear of legal action by conservation groups.

In 1994 the Wingham Forest Action appealed against the decision of the NPWS to grant a licence to the Forestry Commission of New South Wales to take or kill any protected fauna in the course of carrying out forestry operations within the Wingham Management Area. Despite not being legally trained, they represented themselves in the ensuing case. Despite the FIS only considering 24 of the 33 threatened species occurring in the area and containing "*admitted inaccuracies and misleading statements*", Justice Talbot took a liberal definition of what was reasonably practicable "*in terms of time and cost*". While Justice Talbot made a few modifications to the licence, such as requiring habitat trees to be permanently marked and prohibiting the issuing or renewing of grazing permits, he naively considered the licence to be an evolving document subject to review and improvement, stating:

> *... The inspections proposed by the Director General recognise that further information obtained on habitat and impacts of logging and roading will be utilised to amend and update the conditions of licence. It is reasonable to expect that, following inspection, carried out jointly by representatives of Forestry and NPWS, that the Director General will respond in an appropriate and responsible way. It is also reasonable to expect that the Director General may, in exercise of her discretion, requisition the surveys the applicant specifies. That will depend on circumstances as they evolve. The applicant's arguments in this respect do not take sufficient account of the dynamics of the situation and the unfettered power and discretion left with the Director General as the statutory umpire. The Director General has the capacity, the power and a duty to act promptly and effectively. This is recognised by the Endangered Fauna (Interim Protection) Act stated object to give the Director General and the Minister an emergency power to stop work where protected fauna is at risk (s 2(h)). The Court expects and relies upon the Director General to fulfil her duties in accordance with the statutory framework.*

The passage of Threatened Species Conservation Act in 1995 changed the law, though still required the preparation of Fauna Impact Statements while allowing the "temporary" licensing to continue. While threatened plants were theoretically protected with the passage of the Threatened Species Conservation Act in 1995, it again required a blockade by NEFA to force realisation by Government that pre-logging surveys for threatened plants were required and that some protection needs to be provided to them.

The 1936 type locality for the nationally endangered Minyon Quandong (Elaeocarpus sedentarius, previously known as *Elaeocarpus sp. "minyon"*) is Minyon Falls. A single tree, with infertile seeds, was located on the margin of Rock Creek Dam in the then Whian Whian State Forest in 1992. This remained the only known individual until 1995.

Increased logging intensity in Whian Whian State Forest in 1994 led to the formation of the Whian Whian Heritage and Environment Network, a network of 10 local environment including NEFA, and a blockade. A key requirement of conservationists was the undertaking of pre-logging flora and fauna surveys before logging resumed. In 1995, after the Forestry Corporation had undertaken its pre-logging flora and fauna surveys of compartment 79 adjacent to the Rocky Creek Dam, and after logging had commenced, an assessment by

conservationists found a new population of Minyon Quandong within the area proposed for logging. Further investigations revealed a population of 30 individuals.

Independent botanists (Quinn *et al* 1995) subsequently recommended:

> *"Logging in parts of Whian Whian SF may have depleted numbers of this species"... "An immediate moratorium should be placed on logging in the Whian Whian SF compartment in which this species occurs"... "further searches for additional populations should be conducted"* (

After conservationists stopped logging in compartment 79 the Forestry Corporation shifted logging to compartment 61 of the adjacent Nullum State Forest where protests by concerned locals once again stopped logging. A subsequent inspection of that area (Pugh 1995) notes:

> *"Fifty seven Elaeocarpus sp. "minyon" were found that were dead or severely damaged and a further 3 moderately damaged. Fifty of these were 1-10 cm dbh, 7 10-20 cm dbh and 3 20-40 cm dbh. Nineteen appeared to have been directly damaged by machinery, 38 by having trees dropped on them (including where trees were dropped across creeks) and 3 had been felled with a chainsaw (for no apparent reason). This list is likely to be conservative due to the difficulty of finding plants amongst the piles of logging debris. A significant majority of the population within the area inspected appears to have been destroyed or severely damaged. Many of the survivors had tree crowns on or near them. Any fire, fuelled by the logging debris, is likely to virtually eliminate the survivors."*

Forestry Corporation had not only trashed a population of a nationally endangered species, they illegally cut down trees on creek banks, deliberately felled trees into creeks, bulldozed tonnes of soil into creeks, roaded and logged rainforest, ignored fauna prescriptions and clearfelled large areas. They were unable to be prosecuted for the endangered plants because the plants were not protected by the lollypop licence, though were successfully prosecuted for by the EPA for three breaches of a Pollution Control Licence . On 9 November 1995 NEFA called *"upon the public to go out into the forests and peacefully stop all logging in the Murwillumbah Management Area until such time as the Government takes action to stop the wanton vandalism being practiced by State Forests"*. Blockades followed in Mebbin and Wollumbin State Forests and all logging operations in the Murwillumbah Management Area were stopped.

Subsequent negotiations with the Minister for Forests in December 1995 reached an agreement that pre-logging flora and fauna surveys would be undertaken throughout the Murwillumbah Management Area and that a Harvest Planning Advisory Panel for the Management Area would be established. The Forestry Corporation immediately broke the agreement by logging outside agreed areas in Wollumbin SF, despite this deliberate provocation conservationists stuck to the agreement.

Forestry Corporation's (1996) belated audit of compartment 61 in Nullum SF reported:

> *"A significant proportion of the population of* [Elaeocarpus sp. minyon] *in compartment 61 had been damaged or destroyed by the logging. ...The survey indicated that there were about 200 plants with 329 stems found so far in the compartment. 96 stems have been damaged. 33 stems were damaged to the extent that they were considered unlikely to recover.",* and *"... a significant proportion of an*

isolated population of an apparently rare species of flora has been destroyed or damaged."

This did initiate the adoption of prescriptions for threatened plants and for a while thereafter there were pre-logging surveys for threatened plants undertaken by competent botanists, at least in the northern rivers.

As an outcome of the 1996 Interim Assessment Process, the NSW Government agencies developed and formalised systematic Conservation Protocols to regulate logging on State Forest land (NPWS 1996), although there was one to two years further delay before these protocols were fully implemented (NPWS 1998a). The Protocols included:

- general prescriptions aimed at protection of broad landscape features (i.e. oldgrowth forest, rainforest, rare non-commercial forest types, riparian buffers, wetlands, heath, rock outcrops, caves, and minimum numbers of habitat trees);
- species-specific prescriptions aimed at providing some level of protection of potential habitat and habitat features (ie nest sites, roost sites) specific to a species;
- site specific prescriptions to be applied should one of a number of the most poorly known species be found; and
- pre-logging and pre-roading survey requirements aimed at locating threatened species in compartments prior to harvesting.

The Protocols were based on a relatively sound framework for ecologically sustainable management but often failed drastically in the specifics of protection measures applied. The Conservation Protocols were essentially developed through negotiations between the regulator (NPWS) and the regulated agency (SFNSW) without any independent scientific review process. While many of the prescriptions had largely been developed in the NPWS licensing system since the introduction of the *Endangered Fauna (Interim Protection) Act 1991*, they had never been subject to any monitoring or evaluation to assess their effectiveness (and still haven't).

The outcome of the Regional Forest Agreement in 1998 included a revised set of Threatened Species Licence conditions for off-reserve management of State Forests, based on the previous Conservation Protocols. The revised conditions were once again negotiated between State Government agencies without accounting for independent scientific reviews or any assessment of their effectiveness. The licence conditions were included in the Integrated Forestry Operations Approval (IFOA) which is a statutory document under the *Forestry and National Parks Estate Act 1998* that includes all regulations pertaining to forestry operations (Anon 1999a, b).

Since then the Threatened Species Licence (TSL) has been progressively weakened by a series of amendments, most recently the EPA removed the requirements to protect habitat within 800m of Hastings River Mouse records, expand filter strips in the vicinity of Fishing Bat records, establish exclusion zones around numerous plant records and undertake surveys for a variety of species..

A logging prescription for the nationally endangered Hastings River Mouse was identified by the Recovery Team after commissioning research and lengthy debates and site inspections.

The prescription was included in the State-Commonwealth Recovery Plan and was applied to many forest operations from around the mid 90s. A reduced version was adopted as the species-specific prescription in the TSL. The TSL was amended on 7 November 2011 to dramatically reduce the retention of habitat around Hastings River Mouse records from an exclusion area encompassing all habitat of moderate or high suitability within 800m (a potential maximum of 200ha) and all land within 200m (12.5ha) down to a 12ha exclusion area encompassing as much habitat as practical around a record. The chances of locating HRM through surveys have also been reduced with the required trapping effort of a minimum of 400 trap nights per 50ha halved to 200 trap nights. This decision was not based on science or monitoring of the consequences, it was a political slash and burn. This change now opens up hundreds of hectares of previously protected habitat for logging.

One of the corner-stones of ESFM is "adaptive management", which basically requires treating logging operations as trials, where you faithfully implement prescriptions, monitor their effectiveness, and In relation to biodiversity Forests NSW (2005) ESFM Plan notes:

> *Forests NSW will use adaptive management principles and actions within State forests to complement the management of the CAR reserve system.*
>
> *…*
>
> *During operations, site specific conditions are continually assessed, results recorded, the appropriateness of operational conditions reviewed and plans amended where necessary.*

We have come across no evidence of this, quite to the contrary we are concerned that Forests NSW does not learn from their mistakes. We are most concerned that neither EPA nor Forests NSW have bothered to assess the effectiveness of any of the prescriptions in mitigating impacts since their first iteration as Conservation Protocols in 1996. Thus while they have some basis in species ecology their effectiveness is unverified. They were derived politically and are being changed politically. Rather than applying adaptive management as a routine practice we find that Forests NSW use it as an occasional excuse to log somewhere they shouldn't.

In Wedding Bells SF (Pugh 2011) NEFA found that Forests NSW were still logging habitat of the threatened plants Rusty Plum *Amorphospermum whitei* , now called *Niemeyera whiteii*, and Milky Silkpod *Parsonsia dorrigoensis* (with many Rusty Plum cut down or damaged) under a 2000 prescription for these species that were effectively meant to be 2 year monitoring programs. They clearly state that logging where these species occur is expected to kill a number of individuals and that therefore monitoring will be undertaken for 2 years to ascertain the numbers killed and their regeneration ability. It states that results are required to be reviewed after 2 years at which time a new prescription was meant to be applied. While Forests NSW were still logging under this two-year monitoring program they did not submit their first monitoring report on Rusty Plum to the EPA until 2008 and on Milky Silkpod until 2009. The EPA (2012) were not happy that the monitoring was of representative operations and for both species *"is currently reviewing the results ... with the objective to negotiate for either further monitoring or prescribed conditions during harvesting or other relevant action"*.

It is shameful that logging is still occurring so long after the 2002 two year monitoring plan was meant to have been completed and a final prescription adopted. This is "scientific logging" – logging under a monitoring program that is still incomplete and a prescription that

has never been reviewed. This is apparently the best the agencies can achieve for "adaptive management".

It is not believed that any of the set flora or fauna prescriptions have been subject to monitoring to assess their effectiveness. Though without having a clear idea of what they are meant to achieve there is nothing to monitor their performance against.

When approving the Wingham Fauna Impact Statement Justice Talbot (1994) stated he "*expects and relies upon the Director General to fulfil her duties in accordance with the statutory framework",* noting *"The inspections proposed by the Director General recognise that further information obtained on habitat and impacts of logging and roading will be utilised to amend and update the conditions of licence".* Justice Talbot was clearly wrong to expect the National Parks and Wildlife Service to do their statutory duty as since 1994 they have never assessed the effectiveness of the prescriptions.

In practice the requirements of the Threatened Species Licence have been poorly implemented and are often ignored (ie see **Protecting Exclusion Areas**, **Doing Surveys**). After the Forestry Corporation burnt an exclusion area for the Smokey Mouse in south-east NSW, Justice Pepper (2011) of the NSW Land and Environment Court commented:

> *However, in my view, the number of convictions suggests either a pattern of continuing disobedience in respect of environmental laws generally or, at the very least, a cavalier attitude to compliance with such laws.*
>
> *... Given the number of offences the Forestry Commission has been convicted of and in light of the additional enforcement notices issued against it, I find that the Forestry Commission's conduct does manifest a reckless attitude towards compliance with its environmental obligations ...*

The intended outcome of the TSL is rarely even the objective for forestry operations, rather it now comes down to how well worded and prescriptive the licence conditions are. All ambiguities and means of circumventing prescriptions are exploited. The EPA refuse to take action on many blatant breaches and only take token action on many more. It is rare now that the intended flora and fauna prescriptions are applied because of inadequate Forestry Corporation surveys, and even when found it is rare that the required prescription is faithfully applied. (see **Doing Surveys**).

The EPA's (2014) intent is to abolish survey requirements and remove or reduce protections for yet more species, stating their new outcomes-based regulation *"involves moving away from a reliance on detailed and prescriptive rules towards more high-level, broadly-stated principles"* with the primary intent to *"reduce the prescriptive nature of licence conditions*".

The EPA (2014) announced its intention is to get rid of most species specific prescriptions for threatened species and focus on a landscape based approach to reduce *"the need to locate threatened species through costly surveys".* The EPA (2014) maintain that *"Existing RFA commitments to the protection of old growth, rainforest, rare non-commercial forest types and the Forest Management Zone (FMZ) layer will be maintained unchanged*". Though they intend to have "simplified" prescriptions for wetlands and rock outcrops. Current owl exclusion areas will be redone or dumped and exclusion areas already identified for threatened species will be up for grabs. Threatened Ecological Communities are intended to be opened up for logging.

Through the TSL numerous exclusion areas have been identified and mapped in harvesting planning for owls, Marbled Frogmouth, Albert's Lyrebird, Rufous Scrub-bird, Hastings River Mice, Koala high use areas, Brush-tailed Phascogales, Spotted-tailed Quolls, Squirrel Gliders, Fishing Bat, Golden-tipped Bat, a variety of frogs and numerous plants. The location of these exclusion areas has been based upon habitat assessments and species records and thus should be a high priority for permanent protection.

The EPA (2014) intend that current mapped owl exclusion areas will be redone or removed, and that exclusion areas already identified for threatened species may be opened up for logging. They apparently intend to get rid of most record-based exclusion areas and prescriptions for fauna.

The limited off-reserve logging prescriptions that have evolved since 1991 are still inadequate to sufficiently mitigate impacts on threatened species. They are of unknown veracity, have been poorly applied and inadequately enforced. Now it seems they will be wound back and the limited protections diminished.

Threatened Species

Protecting Exclusion Areas

Doing Surveys

Protecting Threatened Fish

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