

JOE SPARKS

Submission ID: 203461

Organisation: N/A

Location: New South Wales

Supporting materials uploaded: Attached overleaf

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Topic 1. Sustainability of current and future forestry operations in NSW

I have independently monitored the forest harvest operations in my area (upper north east region) for over 20 years. NSW Forestry corporations real compliance with the conditions of harvest (CIFOA) is hidden by weak and insipid regulator NSW EPA, I have include an example of this below, where EPA have failed to rule on the most serious allegations of harvesting within riparian areas for nearly two years.(issues 1, 4 ,5 and 6 in the attached document "styx report") is this acceptable to members of this panel?

EPA "the regulator" sistimaticly use obfuscation and trivialization as a way of undermining any allegations of wrong doing by NSWFC and this appears to be their modus operandi when dealing with complaints of breach of law by members of the public.

The regulator is deliberately hiding the negative impacts of theses forestry operations on public land, so any information put forward (to this panel) by this regulator is denatured and should not be relied on as presenting a real picture of whats happening on the ground in the forest.

The current industry is very wasteful, and is uneconomic, unsustainable and is being propped up entirely by fuel subsidy's and all the NSW's tax payer is getting from this industry is a degraded and devalued landscape. Its for these reasons I believe we must stop all native forest logging on public lands immediately

Topic 2. Environmental and cultural values of forests, including threatened species and Aboriginal cultural heritage values

Our forests generate rainfall and cool the land, clean the air, provide homes for our threatened species, and are important for human recreation and improved health, they filter and regulate runoff to streams, and remove carbon dioxide from the air and store it in their wood and soils. being exposed to forests has positive impacts on peoples mental health, and well being.

Topic 3. Demand for timber products, particularly as relates to NSW housing, construction, mining, transport and retail

We should be relying only on plantation timber for our general construction.

Topic 4. The future of softwood and hardwood plantations and the continuation of Private Native Forestry in helping meet timber supply needs

Increase plantations of hard wood for building, increase all plantations so as to cater for all our wood needs.

Topic 5. The role of State Forests in maximising the delivery of a range of environmental, economic and social outcomes and options for diverse management, including Aboriginal forest management models

Public forests are of benefit for water yields, tourism and carbon storage than they are for logging. It is in the best interest of taxpayers to stop logging of public native forests.

Topic 6. Opportunities to realise carbon and biodiversity benefits and support carbon and biodiversity markets, and mitigate and adapt to climate change risks, including the greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests

Native forest logging in NSW releases carbon. The volume of carbon stored in logged forests has been more than halved. Stopping logging will enable forests to regain their lost carbon and recover making a significant contribution to meeting our climate targets



Our Ref: DOC24/165137-1

Mr Joe Sparks

By email: [REDACTED]

13 May 2024

RE: Alleged breaches at Styx River State Forest Compartments (Cpts) 28_29_34_35

Dear Mr Sparks

I am writing in response to your original letter dated the 03 March 2023. While noting that the EPA did provide a brief update previously, please accept our apologies for the delay in responding to these issues. In order to respond to the issues raised clarification regarding several policy positions was required, which delayed the investigation.

EPA officers have undertaken two site inspections in Styx River State Forest Cpts 28_29_34_35, between July and September of 2023, to assess the alleged breaches of the Coastal Integrated Forestry Operations Approval (**CIFOA**) by Forestry Corporation of New South Wales (**FCNSW**). From these inspections and subsequent investigations the following issues have been assessed and resolved:

- **Issue (2) Two merchantable logs left after being felled** - This is not a breach of the CIFOA.
- **Issue (3) Area of Rainforest Impacted by Logging** - The area in question is not mapped as "**unassessed crown timber land**" as per the definitions in Protocol 39 of the CIFOA. This means that the area in question has previously been subject to a relevant assessment and/or planning process to identify any areas of Rainforest. The EPA does not reassess areas of State Forest.
- In response to **Issues (7), (8) and (9)**, the EPA has issued FCNSW with an Advisory Letter detailing that the excessive soil disturbance within the Ground Protection Zone (**GPZ**) at 422321 E, 6612924 N and the retained spoil within the GPZ of a drainage depression at 422517 E, 6612947 N is not an acceptable practice.
- **Issue (10)** - FCNSW had relocated the Channel Head further down the drainage feature and the EPA assessed this to be compliant with CIFOA. Due to the relocation of the Channel Head, earthworks had not been undertaken within the 5m Riparian Exclusion Zone (**REZ**) of the Class 1 Drainage Line.
- **Issues (11) and (12)** - FCNSW had relocated the Channel Head further down the drainage feature and the EPA assessed this to be compliant with the CIFOA. Due to the relocation of the Channel Head, debris had not been retained within the 5m REZ of the Class 1 Drainage Line. Additionally, the snig track had not entered the 5m REZ.
- **Issue (13)** - at the time of the inspections undertaken by EPA officers, FCNSW had already undertaken some remediation works at this site and disturbed soil was beginning to stabilise with grass seed. EPA officers assessed the remedial works to be acceptable and compliant with CIFOA at the time of the inspections.
- **Issue (14)** - the EPA have reviewed the available information and determined that no breach of the CIFOA has occurred in relation to the mapping of Forest Type within compartment 29 of Styx River State Forest.



- **Issue (15)** - the Hollow Bearing Tree (**HBT**) located at 423297, 6614346 N was assessed by EPA officers and determined to be damaged. However, the damaged HBT had been recorded by FCNSW and a replacement tree had been identified and retained within the patch as per the requirements of the CIFOA.
- **Issue (16)** - the HBT located at 423774 E, 6614291 N was assessed by EPA officers. The retained HBT appeared to have been impacted by fire and no damage could be attributed to recent harvesting activities. The damage sustained to this tree does not meet the definition of “damage” as defined in Protocol 39 of the CIFOA.
- **Issue (17)** - for the purposes of the CIFOA the *Euphrasia arguta* record in Bionet is a historical record and does not meet the requirements of a **record** as per the CIFOA.

Please note that our investigations into Issues (1), (4), (5) and (6), as detailed in your letter dated 03 March 2023, are ongoing and we will correspond separately to confirm our position in relation to these issues.

The EPA appreciates your effort in bringing these issues to our attention and again apologises for the delay in providing you with this response.

Sincerely



Manager Regional Operations



Report on of condition of forest after recent Coastal IFOA logging event.

By Joe sparks 03/03/23 [REDACTED]

Styx River State Forests (compartments 28, 29 34 and 35.) this forest is 50km east of the town of Armidale in the new England region of NSW. A lot of this forest is above 900m from sea level and so contains alpine vegetation types, these areas are known to at the forefront of negative climate impacts Its sad to see NSW government has no empathy for this reality.



Tree cut behind 2 line exclusion.

Here in Styx River State forest compartment 28 , we found 24 trees cut down within 10 meter stream protection zone, this destruction would not have been allowed under the old IFOA licence rules, this and the accompanying earth disturbance, caused by the cutting machines, will unnecessarily exacerbate the pollution impacts of this operation on the Macleay river catchment. Its really disappointing to see this winding back of conditions by the NSW EPA having direct negative impacts on the peoples forest's and water. Despite these environmental capitulations this operation still pushed their legal boundary's.

Alleged breaches found in compartment 28:

- 1. 0422520/6613320 Tree cut two meters from incised channel.**
- 2. 0422500/6613337 Two merchantable logs left after being felled.**

3. 0422501/661355. Area of rain-forest impacted by logging.

This area also appeared to have the stream exclusion zone marked incorrectly from the centre of gully rather than from the top of bank, this puts points 4,5 and 6 in the five meter exclusion zone.

4. 0422500/6613332 tree cut within stream exclusion. (top of bank measured incorrectly)
5. 0422510/6613350 Tree cut within stream exclusion. (top of bank measured incorrectly)
6. 0422503/6613343 Tree cut within stream exclusion. (top of bank measured incorrectly)
7. 0422525/6612952. Spoil from snig track construction left in centre of mapped stream.
8. 0422330/6612927. Side ways movement of tracks in mapped stream exclusion.
9. 0422323/6612930. Excessive earth works 5m into mapped stream exclusion.
10. 0422222/6612464. Earth works 1m into mapped stream exclusion.



4. 100m of mapped stream and rain-forest impacted by logging, arrows show locations of cut trees.

11. 0424580/6614187. Debris pushed to 9 m in to stream exclusion (incised channel present)
12. 0424580/6614185. Snig track within stream exclusion zone.
13. 0423458/6613988 to 0423460/6614112. 200m of un-drained snig-track at 5 degrees slope, draining in too head of mapped stream with no sediment control.

Off licence issues:

14. 0423460/6614112 to 0423297/6614346 Area appears to be wrongly typed as new England black butt.
15. 0423297/6614346. Habitat tree destroyed by logging.
16. 0423774/6614291. Habitat tree damaged by logging.



Illustration 1: H tree destroyed by logging

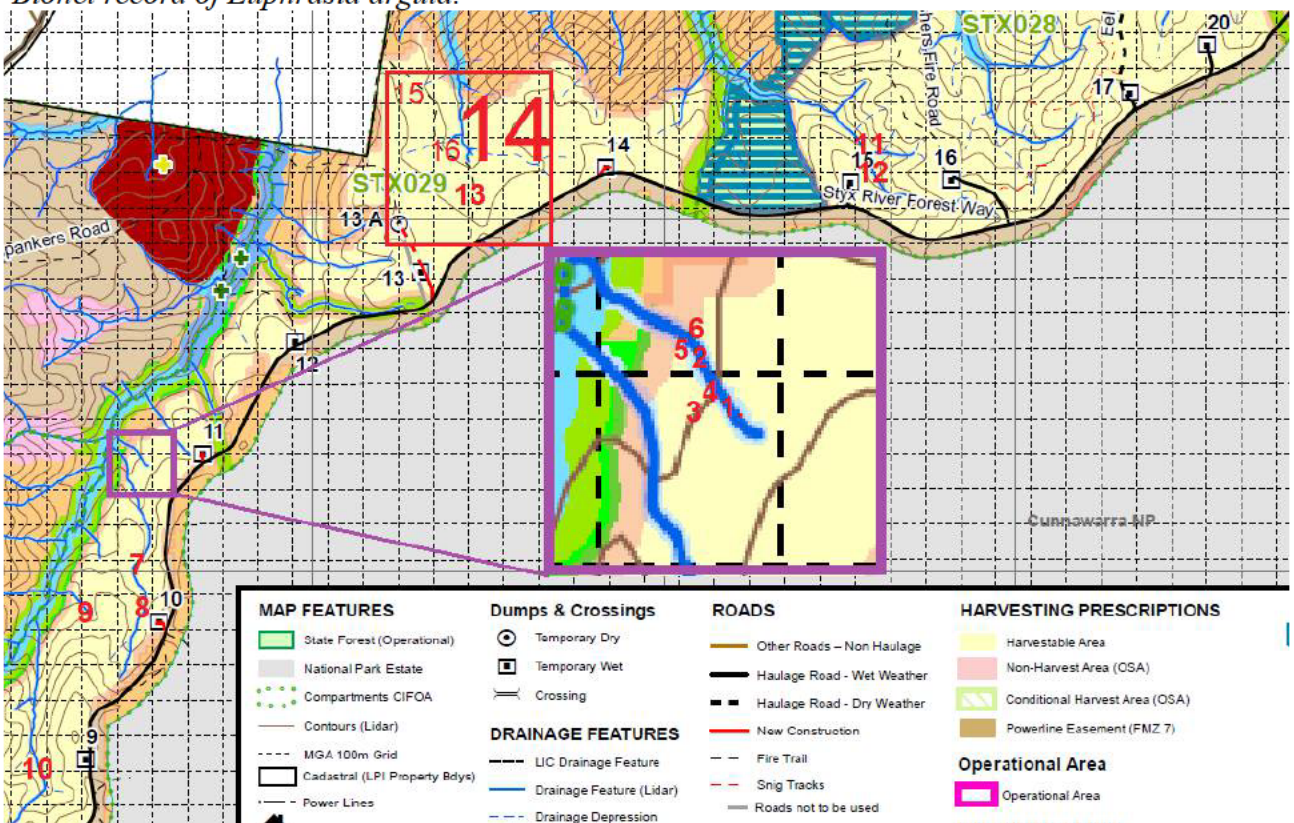


un-drained Snig-track at 5 degrees slope, draining in too head of mapped stream with no sediment control.

17. There is No sign of critically endangered plant *Euphrasia arguta* being considered for protection by this operation. There is a record present on the Bionet database at 0425011/6614642 there appears to be no consideration of this plant at all going on the available documents. (See below)

Status	
Status	Valid and accepted without modification
Validation Flags	
Description	New England.
Latitude	-30.598414
Longitude	152.217766
Zone	56
Easting	425011
Northing	6614642
Accuracy	25000
Sighting Notes	
Determination status:	det.
Determiner:	WR. Barker
Date Determined:	30 May 1973
Habit / Notes:	Noted

Bionet record of *Euphrasia arguta*.



Areas of interest numbered on the above map.