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Native Vegetation Regulation Review
Conservation Policy and Strategy Section
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Private Native Forest (PNF) Code of Practice

This submission is a brief comment on PNF logging in its wider environmental and social context rather than on specific changes mooted for the PNF Code of Practice. Whilst it is acknowledged that PNF logging codes are better than previous practice, it is considered that this facilitation of private logging and the scale it has reached will result in environmental impacts that government has thus far chosen to ignore.

As the PNF process marks its fifth anniversary and PNF logging approvals approach 500,000ha in NSW, it is time to take stock and review the cumulative impact of logging on this scale. To many who have an interest in forest ecology, the assertion that PNF logging operations are only permitted if they "improve or maintain environmental outcomes" is essentially meaningless.

My property is situated on the upper reaches of the Bombala River in SE NSW. The six properties in this locality that have been subjected to PNF logging to date, formed a forested buffer between intensively logged State Forest and the cleared land of the lower valley. They constituted a valuable refuge for wildlife with some areas of relatively undisturbed forest vital to a suite of arboreal mammals and birds.

In the absence of any wildlife surveys under the PNF protocols, the limited requirements set out in PNF legislation assume critical importance. Among these is the stipulation that ten habitat and ten succession trees be retained per 2 ha. I had assumed that such trees would be identified and taped, but soon came to realise that this was not the case. I was eventually advised in writing by DECCW that "habitat trees are not generally required to be marked, however, it is recommended that landholders undertake marking." This has not happened in my district.

By the end of October 2011 1,971 PNF logging approvals had been granted covering 413,840 ha with 327 monitoring inspections (129 operational & 129 audit) carried out. Overwhelmingly, compliance issues related to inadequate road and snig track drainage. The wider issues of habitat modification, loss and disturbance and the long term environmental impacts are not addressed because the PNF Code does not contain the mechanisms to do so. The PNF Code operates within a set of narrow procedural parameters. The lack of survey and on ground work, no doubt partly the result of chronic under resourcing, means that there is no benchmarking to enable ongoing analysis of the wider ecological impacts.

Many native forest dependent species are in decline across NSW. Along with agricultural expansion, urban encroachment, public estate logging and climate change, PNF logging constitutes yet another pressure on our ecological communities. Levels of disturbance and habitat modification caused by such logging could prove to be highly significant.

In this context, concerns have been raised with government over the high number of PNF logging approvals in the forests west of Coffs Harbour identified as significant koala habitat. Despite all the data pointing to an alarming decline in koala numbers across NSW, these approvals went ahead with the promise of improving or at least maintaining environmental outcomes.

If political reality dictates that the logging of privately owned native forest should proceed on the current scale, then government agencies should at least have the integrity to acknowledge wider

environmental impacts rather than perpetrate the current contrived greenwash.

Notification of PNF logging

Under PNF arrangements, landholders are not notified of logging about to commence on their boundaries. It has been a matter of considerable angst that the sound of chainsaws is often the first indication of such operations. It has been put to me, that while residents in urban areas are notified of minor changes to neighbouring properties, rural residents receive no advice of commercial logging next door.

PNF approvals in my district have resulted in commercial logging of tightly clustered lifestyle properties with visual and aesthetic impacts. This has led to division within the community.

Fire issues

Under PNF logging the tree crowns are simply left on the forest floor as they are of no commercial value to the logging contractors. In adjoining State Forest such operations are followed by post logging burns which reduce logging residue fuel loads. Under the PNF Code there is no such hazard reduction requirement placed on private landholders.

This has led to increased bushfire hazard and a questioning within the community as to whether local volunteers within the Rural Fire Service should be responsible for reducing logging residue fuel loads and in effect provide a free service for what is a commercial operation.

Private forests and carbon storage

As a consequence of the global effort to reduce carbon emissions, we are reaching the point in Australia where the assessed environmental value of forests exceeds the income potential from logging, with direct financial benefit for the landholder.

REDD Forests, one of the private sector operators in the carbon offsets market, has advised me that while forested areas of less than 500ha are not currently considered viable for the scheme, this will change as new methodologies reduce compliance costs and a grouped approach (landholders combining properties) is developed.

It is to be hoped that government agencies with their statewide networks and landholder contacts will act as facilitators as this process gains momentum.

August 2012