



Coastwatchers

Eurobodalla's voice for nature

Coastwatchers Submission to Draft Private Native Forestry (PNF) Codes of Practice NSW

FINAL 19 May 2020

<https://www.ils.nsw.gov.au/help-and-advice/private-native-forestry/private-native-forestry-review>

Coastwatchers Background

The Coastwatchers' Association Incorporated (Coastwatchers) is a community organisation with close to one hundred members that has served the Eurobodalla region from South Durras to Mystery Bay on the South Coast of NSW for over 30 years.

Coastwatchers acting in close co-operation with the wider community, the environment movement, the Eurobodalla Shire Council and the NSW State Government aims to help protect the environmental health and beauty of this very special NSW South Coast region. The Association aims to raise awareness in the community of environmental and climate change issues. Campaigns are summarised at Appendix A (at end).

Coastwatchers endorses the Environmental Defenders Office submission on PNF

In addition Coastwatchers recommends Private Native Forestry Codes of Practice, must:

1. **Contain no less than the minimum FCNSW standards for environmental protection across NSW which in the southern region are contained in the Coastal Integrated Forestry Operations Approvals Protocols and Conditions are located at the following link:**

<https://www.epa.nsw.gov.au/your-environment/native-forestry/integrated-forestry-operations-approvals/coastal-ifo>

This includes requirements for:

- **Surveys of threatened species before logging so they can be protected.**
- **Accurate mapping of and full protection of Threatened Ecological Communities, rainforest, old growth forest, wetlands, heathlands and rocky outcrops with buffers.**
- **Logging should be excluded from steep slopes over 25 degrees.**
- **Trees over 80 cm diameter (dbh) must be protected.**
- **Retained nectar feed trees must be large healthy mature trees.**

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2. Where forest has been burnt, as well as incorporating FCNSW environmental protections, measures also must contain the new minimum EPA conditions for burnt forest at the following link:

<https://www.epa.nsw.gov.au/your-environment/native-forestry/bushfire-affected-forestry-operations>

The EPA post bushfire site specific conditions increases many FCNSW environmental protection factors such no logging of unburnt forest, increasing existing stream width buffers by an extra ten metres so they range from 20 to 60 m, protects all hollow bearing trees, increases buffers to 35 metres around lowland rainforest (previously no buffer) other types of rainforest (previously 20m) and rocky outcrops (previously 20m) etc.

The bushfire site specific conditions are summarised as follows on the EPA website with critique in italics. This critique has been based on the [site specific conditions for Mogo State Forest Compartment 174a](#). The rules for timber harvesting in fire-affected areas include:

- **A new requirement which requires the retention of unburned or lightly burned forest in these sites to ensure they can provide ongoing refuge and food for animals that persisted during the fires.** (*logging has resumed in regenerating forest – burnt trees are still alive in the compartments being logged around Batemans Bay*).
- **Increased protections around landscape features like rainforest, rocky outcrops and heathy vegetation as these areas often provide important shelter and food resources for animals, and the right environmental conditions for the regeneration of unique native plants.** (*Item 27 – in burnt forest the exclusion zone is now 35m (an increase from 20m and from zero metres for lowland rainforest) for heath and scrub, rocky outcrops and cliffs, rainforest and TECs but how to tell where rainforest is in burnt forest?*).
- **Increased protections for hollow-bearing trees and important feed trees to ensure more nesting and food resources are retained and protected.** (*Item 17 states that now all hollow bearing trees must be permanently retained. In the CIFOA only a few HBTs are retained per hectare. All HBTs must be permanently retained across all logging operations across Australia not just in burnt regenerating forest as they are critical habitat for threatened species). Will all HBTs be retained permanently (ie forever) or is that just until the rules change next time round?*
- **Intensive harvesting will not be permitted in burnt areas to lessen erosion risks and biodiversity impacts.** (*the burnt steep headwaters of Cabbage Tree Creek have been logged in March 2020 in Mogo Compartment 174 despite heavy rainfalls from Cyclone Harvey*).
- **Increased requirements to prevent or minimise erosion and water pollution in local creeks and rivers given the fires have removed most of the ground cover and destabilised soils. These requirements include**
 - the significant expansion of protections around streams (*Item 33 Table 2: The Class one creek buffers that were reduced in the CIFOA from 10m to 5m have been expanded to 20m, Class two creeks increased from 20 to 30m, Class three creeks from 30 to 40m and Class four from 50 to 60 meters. So the reduction in the smallest creeks at the top of ridges that form headwaters were restored and then 10 meters added to both sides of the creek for wider creeks. So only 10m extra was added to most classes of creek*

which is not really a significant expansion. Class one creeks should not have been reduced to 5m as big trees at tops of ridges are needed by threatened species and for erosion control.

- stricter limits to reduce the distance water can flow on road, tracks and log dumps
- requirements to stabilise exposed soils during and after harvesting operations.

Background to the Site Specific conditions for Bushfire Affected Operations

Site specific conditions for bushfire affected operations that were brought in by the EPA (NSW) in March 2020 increased protections under the recently approved Coastal Integrated Forestry Operations Approvals(CIFOA).

The bushfire site specific conditions summarised and critiqued above were brought in by the EPA (NSW) in March 2020 to strengthen protection of burnt regenerating forest only fifteen months after the CIFOA was implemented. This was after “five million hectares in NSW were burnt, including more than 890,000 hectares of native State Forests as well as forests on private land.

These post bushfire site specific conditions increase many factors such as stream width by an extra ten metres, protect all hollow bearing trees, increase buffers to 35 metres around lowland rainforest (previously no buffer) other types of rainforest (previously 20m) and rocky outcrops (previously 20m) etc.

The November 2018 CIFOA halved first order stream buffers from 10m to 5m across the entire area. EPA then increased this in March 2020 to 20m post fires for logging in burnt areas. Reducing class 1 creek buffers from 10m to 5m means that trees that were previously protected in the buffer zone next to small creeks at the top of ridges will now be harvested as half of the buffer zone is now open to logging. Trees that are next to creeks and rivers are much bigger due to the water flow. Logging these big old trees will significantly reduce habitat for tree reliant species such as the koala as well as all hollow reliant marsupials and birds ie cockatoos that nest in big old trees with hollows.

Yours sincerely

The Coastwatchers Association Incorporated Management Committee

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Appendix - Coastwatchers Campaigns:

General issues have included:

- Local Government planning issues, such as Local Environment Plans, Development Control Plans and Development Applications
- Rural Lands Studies
- Heritage Studies
- Providing representatives on River, Catchment and Estuary management committees
- Tree Protection and Land Clearing

- Global Warming and Sea Level Change
- Stop native forest logging and complete transition to plantation forests
- Koala Studies
- Jet Ski Usage
- The Management of Nature Reserves and National Parks in the Eurobodalla Shire
- The development and dedication of the Eurobodalla National Park
- Bushfire prevention
- Management of the Shire's Community Lands

Southern Issues have included:

- Brou Landfill
- Dargues Gold Reef Mine 2010 and 2015
- Stopping the Shooting Range at Gulaga (Mt Dromedary)
- Huntfest
- Lawlers Creek Dam

Northern Issues have Included:

- Stopping the proposed Mogo Charcoal plant
- Bangalay Sand Forest Protection and Biodiversity
- North Head Moruya/Airport/ Bengello
- Planning and Construction of major roads such as the Surf Beach Bypass
- Batemans Bay Dredging
- Policies for submerged Lands and Erosion
- Major Resort Developments
- Murramarang Crown Land Extension
- Preservation of the Cullendulla Wetlands