

28.7.12

To whom it may concern

Comments on new draft regulations for native vegetation

**General**

1. The inclusion of Pasture cropping as an approved PVP amendment is very good to see as is the removal of need for annual returns for Private Native Forest PVP holders.
2. There is not enough information on the credit system to decide if it is a viable option.
3. An Appeals process needs to be introduced especially where land is freehold. This seems like natural justice for any legislation. The documentation says that landholders can make genuine mistakes. Bureaucrats and administrators can too so some form of Appeal needs to be included in the regulations.
4. Mining companies, developers, Local government, RTA and other government authorities should be subject to the same regulations as agricultural landholders for equity reasons and because sustainability goals for vegetation are no different.
5. Some form of recognition should be added for landholders who include conservation management in their practices (e.g. waiving LHPA rates or part of local government rates for land when it is removed from production). This is not referring to official conservation agreements and of course would require the landholder to 'prove' the land is permanently conserved and included in their PVP. The uncertainty of a Conservation Agreement's affect on land values in the future has resulted in our case, in fencing out half our area for conservation on a voluntary basis but with no recognition or concession for contributing substantially to biodiversity maintenance.

**Draft example Codes of Practice "Management of Invasive Native Species" and "Thinning to Benchmark Stem Densities":** both codes seem straight forward and clear for ease of use with a few minor exceptions listed below.

1. Thinning Code: Section 6, page 8: second sentence is unclear. Does this mean RAMA such as fence clearing?
2. Thinning Code: Spelling mistake page 9 'dominate', should this be dominant?
3. Thinning Code Appendix 1: What is meant for thinning if a species is not listed? Does it mean it can be thinned? Further to this point: there may be a danger in the Border River Gwydir CMA (BRG CMA) that not all applicable species may be listed given the diversity of vegetation types that occur. Different soil types and aspect mean different trees can be over dense in different areas, e.g. orange gum, stringy bark, grey tea tree, cypress pines.
4. Both Codes: No detail is given of what records need to be maintained. Additionally, seven years is a long time for vegetation to change dramatically under premium seasonal conditions.

5. Retaining 20% of affected area in both INS (p.7) and Thinning (p. 8) needs explanation. Is this to prove that any action was legitimate by showing what the original was? Include the rationale please.
6. Thinning Code Section 5: On the Northern Tablelands 50 ha. in a two year period is a small area and is unlikely to contribute to production enough to warrant the cost of action for either INS or thinning and therefore will not achieve either of the BRG CMA goals of sustainable production or conservation. 100 ha would be nearer to a viable area where the only production choice is grazing.

#### **Environmental Outcomes Assessment Methodology (EOAM)**

Having been involved in developing decision-making assessment tools, I believe the EOAM will remain flawed. Computer modelling cannot adequately capture or reflect reality because of the limited number of variables that can be taken into account. While its purpose in removing the variability of human decision-making and bias is a worthwhile goal the tool is unlikely to achieve a realistic outcome. The process becomes too formula based and cannot take into account the overall diversity on most land areas. Unfortunately I cannot think of another positive alternative. Perhaps the scenario options will help land managers be more confident in the tool's value. This will require a lot of bridge-building by CMA staff to result in confidence in the process. Perhaps real like examples of options could be provided.

Thank you for the opportunity to comment.

Lynne Chapman



Guyra, NSW, 2365

**CC: Border Rivers Gwydir CMA**