

**From:** [REDACTED]  
**Sent:** Sunday, 19 August 2012 12:46 PM  
**To:** EHPP Landscapes & Ecosystems Section Mailbox  
**Subject:** FW: Comment on Draft Native Forestry Code of Practice for Southern NSW

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Comments on the Draft Native Forestry Code of Practice for Southern NSW .

Thank you for this opportunity to comment.

The introduction to the Code says that the object of the Native Forestry Code of Practice "...is to ensure that a regular supply of timber products can be maintained indefinitely for present and future generations from privately owned forests and Crown land that is not Crown-timber land within the meaning of the Forestry Act 1916, **while at the same time maintaining non-wood values at or above target levels considered necessary by society to prevent environmental harm and provide environmental services for the common good.** "

Could the EPA please explain how logging operations approved on two properties adjacent to mine in the Mount Rae forest , meet these goals? They are being logged for commercial level firewood without the need for any environmental surveying.

- My own property is protected by a Conservation Agreement with Environment Minister Robyn Parker recognising threatened species and EEC's. This agreement required detailed studies before signing .The PNF approvals on these surrounding properties required no wildlife or vegetation surveys. Why are the very same environmental values and threatened species ignored under PNF ? My property is recognised as containing the NSW listed as Endangered and Commonwealth listed as vulnerable Doubletail Buttercup Orchid , vegetation communities considered 90% and 95% cleared elsewhere, as well as providing habitat for 10 threatened fauna species documented in this forest.

To achieve the goal "to prevent environmental harm " I would ask that the Code require all lands applying for PNF would have to undergo independent surveys, the same as anybody else would be required to do . I would have to undergo such surveys even to subdivide my land. I believe that 'society' already believes that surveys are being performed before such operations are approved.

- Why are the Property Vegetation Plans for PNF not submitted to the local Catchment Management Authority as all other PVPs are? CMA's employ professionals with local knowledge who perform vegetation assessments for other landowner plans. Why is a

commercial firewood seller given special treatment by the Office of Environment and Heritage?

- Approvals were originally granted on three properties for commercial firewood clearing and logging. This is the same habitat that other landholders were originally asked to protect by the Department of Conservation and who also told the firewood developer there was to be no more felling of trees. The then Departmental advice to us and local council was that the impacts of logging would have a negative effect on the vegetation communities of this forest and it's threatened species, particularly the NSW listed as Endangered and the Commonwealth listed as Vulnerable Buttercup Doubletail Orchid . Why did the department then give PNF approvals when these lands were being targeted for protection by their scientists at the same time? Why didn't they check with their own experts? Did the then science and conservation advice somehow change when the PNF interim act was introduced?
- The Southern Code of Practice has a list of prescriptions to protect threatened species. Landholders were promised by the department that any orchids on lands for logging would be identified and fenced off. I am only aware of a one off survey during drought in 2007 and am not aware of any fencing off. I know that other landholders have conducted surveys with orchid experts over extended time frames identifying these same rare Commonwealth protected orchids on adjoining lands . Most orchids did not flower during 2007 because of drought conditions. We were clearly told by government botanists and ecologists that this forest is habitat for this species, that they could not all be identified in a one off survey and we should act to protect them. I listened to the departments recommendations and have entered a protective covenant on the land title of my property for this reason. Why is it necessary for me to protect this rare forest and its rare species when those involved in PNF ignore all existing advice ?
- Other threatened species were well known in this forest but they are not even acknowledged by the firewood developer because of the flawed PNF process? Leaving threatened species identification up to firewood sellers and any protections to self regulation obviously isn't working in this case. The values of my property , confirmed by government experts are just ignored next door . Gang gang cockatoos which are known to nest and feed here aren't even on the prescriptions for the Southern Code ? It's bad enough when they can be ignored by the developer , but far worse when the OEH also ignores them and leaves them off the list of threatened species for Southern NSW ? Is this an admission that listing them doesn't matter as no developer is going to admit to them anyway ?
- I do not believe that logging native forests at a commercial scale for nothing better than firewood and causing biodiversity losses is " for the common good." Landowners are allowed firewood for domestic use under the current NV act . Allowing native forests to be cleared and felled for commercial scale firewood for sale in towns and cities is too much. Governments are implementing measures to prevent greenhouse gas emissions, and telling us to take seriously possible future impacts of global warming , so why are they encouraging firewood loggers in the Southern Tablelands to increase emissions from cities ? This doesn't make sense. The forestry group backing the developer in this forest has publicly said that PNF can be used to allow logging on over a million ha. in the Southern Tablelands to supply

**Canberra and Sydney with firewood!!** How can any government be taken seriously when they ignore these loopholes for large scale firewood clearing on such a vast scale?

- Local councillors made a decision to vote against this operation in 2008. This was based on past expert advice from the department, input from landholders and local knowledge. PNF has now removed the need for council consent and logging has commenced. Why would the OEH take an area previously protected and just streamlined a firewood loggers plans against all past departmental advice? Locals had gone to great efforts to respond to the departments original advice to act to protect and conserve. For many years local landcare has made Mount Rae forest the focus of vegetation corridors for which they have won awards and received government funding. Why do Environment Ministers and government departments now undermine these efforts? I took genuine actions to protect my lands and threatened species for the future on the advice of government ecologists, so why do our governments now ignore their own recommendations? I will think twice before excepting any advice from the Office of Environment and Heritage in the future.
- My own property is a nature retreat and bed and breakfast which was approved well before the government allowed logging next door. The granting of biocertification by the minister allows a non-resident firewood merchant to buy up lands and log them but removes any right I had to object to these operations as someone who actually lives here and makes a livelihood in this forest in sympathy with surroundings, and following the advice of OEH officers on correct land management for this area. PNF logging approvals are clearly affecting my right to make a living. Under the current State government we were lead to believe that decisions would go back to local communities. PNF clearly removes locals from the process. I have written a number of letters to local newspapers expressing my dissatisfaction with how this matter has been handled and the removal of local communities from the process.

I would hope that on reading the above example of how problems are occurring under the current draft CoP that the present government will make changes to ensure such things cannot happen in any future legislation.

Sincerely yours

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