
From: [REDACTED]
Sent: Tuesday, 21 August 2012 5:35 PM
To: EHPP Landscapes & Ecosystems Section Mailbox
Subject: PNF Submission

Dear Review Panel,
Thank you for the opportunity to submit my views on the Private Native Forest initiatives.
I hope you find my submission interesting, thought provoking and of value.
If you have any questions, please feel free to contact me.
Kind regards,
Bronte Somerset.

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21 August 2012

Native Vegetation Regulation Review
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TO: Members of the Review Panel

Thank you for the opportunity to express my thoughts about the new Private Native Forest (PNF) initiatives. After having attended the PNF meetings in Narooma and Bega, I make the following response.

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RECOMMENDATIONS

1. Despite being well meaning, half measures designed to protect the environment will only ever get half a result. Implementing an end to all the State's native forest logging operations will obtain optimal benefits for retaining fragile ecosystems, preserving healthy landscapes and capturing atmospheric carbon.
2. Ascertain the future benefits for State Forests and private landowners to profit from participation in emerging carbon credit schemes which could provide them with alternative income sources.
3. In light of the 'free fall' in koala populations, preserve into perpetuity, all State and privately owned native forests and habitat trees where koalas once lived, where they now live and which they could inhabit in the future.

GENERAL SUMMARY

1. PNF logging should be evaluated contextually in that it and State Forest logging has environmentally detrimental impacts on the landscape. For PNF landowners to comply with new regulations for their agricultural management practices, the State's Forest bodies need to lead by example. Integrity and credibility in the State Forest body will never be established

publicly while 2,500-3,000 native forest timber logs enter the Eden Chipmill every working day.

2. The government needs to take a serious look at accounting and consider the native forest logging operation's environmental and economic balance sheet.
3. State Forest bodies are compensated not to log certain habitat trees. PNF owners are not compensated not to log habitat trees. This demonstrates cronyism and un-level playing field. If the government wishes to regulate the PNF Act then fair principles should underlie it to ensure democratic thinking and processes are applied.
4. The conditions under which PNF owners identify trees for retention is vague. Training is required for PNF owners to form knowledge-based decisions.
5. Transparency should be afforded private landowners by informing them that an option to logging would be to have the ongoing potential to earn more per hectare of forests by collectively participating in forest carbon credits schemes.

SPECIFIC SUMMARY PERTAINING TO THE DISCUSSION PAPER ON PRIVATE NATIVE FORESTRY AND KOALAS

1. Address the uncertain issue of who determines core koala habitats in privately owned native forests including the State's forests. Koala surveys have proven to be inadequate: koalas have just been identified in Tanja State Forest which was due to be logged early August 2012.
2. In light of the presence of a highly significant and unique genotype of koalas in the SE forests, urgently address the issue of why, according to Table 1, the Bega Valley Shire Council has not prepared a Koala Plan of Management (KPOM).

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"We have not inherited our environment, we have borrowed it from our children"

The recent PNF meetings caused me to reflect on my approach to conservation, the concept of thinking globally, putting effort into acting locally to improve the environmental legacy which I, my conservationist colleagues and today's environmentally savvy youth are striving to leave for future generations.

Having moved to the Far South Coast of NSW, I have seen that the State Forests' operations offer an option which to me seems to be the antithesis of protecting, connecting and restoring the naturally occurring elements. They destroy the local environment at a much faster rate than control measures put on individuals can possibly outweigh.

The thinking and critical public cannot be expected to accept new regulations when they know that ForestsNSW is permitted to continue to destroy native forests, their biodiversity and their beauty. It is incongruous that private native forest owning individuals are being asked to, or regulated to, comply, when ForestsNSW continues to send truckloads of timber from native forests to the chipmill at Eden. This is counterproductive to the intent of the new legislation and should be stopped in order for a fair playing field to be established.

Plantations can supply most of Australia's timber needs. The forests of SE NSW are logged, then 'flogged' cheaply as woodchips to Japan. 90% of all of Australia's logged native forest timbers end up as woodchips. It is always newsworthy when we hear of the logging of virgin forests in Indonesia or the Amazon. What we fail to recognise is that Australia's 'virgin' forests were logged many years ago. We continue to compound this activity by continuing to log native forest trees.

THE WOODCHIP OPERATOR'S BALANCE SHEET

A brief review of the logging operation's balance sheet is revealing in terms of what it means for the economy, the community and the environment.

DEBIT SIDE	CREDIT SIDE
NSW Auditor General confirms that ForestsNSW hardwood operations are heavily subsidised by the NSW government	
Economic unsustainability	
Destruction of habitats and wildlife corridors	
Serious and imminent threat to the few remaining 'ancestral' koalas in the SE forests – the largest koalas on the planet	
Degradation of water catchments and marine estuaries	
Erosion of soil	
Promotion of dry sclerophyll forests making them more fire prone	
Destruction/reduction of canopy	
Death of native flora and fauna	
Invasion of exotic weeds	
Reduction of carbon storage capacity	
Pollution caused by biomass burning	
Cost to taxpayers of court actions incurred by:	
1. environmentalists who require to defend their 'on the ground' forest protection activities. (Judges nullified over 90% of recent cases)	
2. Forests NSW defending breaches of the Regional Forest Agreements (RFAs)	

ABORIGINAL ISSUES

Barely touched on at the Narooma meeting, and not at all at the Bega meeting, was the issue that we are logging trees from land for which the Aboriginal people are the original custodians. Over 50% of native vegetation has been stripped from the lands which they owned and which they protected for an untold number of years.

State Forests was required to halt their logging operations in Mumbulla State Forest in 2010 because they were logging in Aboriginal sacred ground. The voice of the Indigenous people needs to be heard and respected and this omission is noted in the Fact Sheets.

Warning: These pictures may contain images of people who are now deceased.



Figure 1: Aboriginal people marching into Mumbulla forest to claim successfully their right for its protection during logging operations.

KOALA DISCUSSION PAPER

Australia is the No. 1 reporting country for species loss¹



Figure 2: Koala found in Mumbulla State Forest 2009 prior to logging events



Figure 3: Koala found in Bermagui State Forest (circa) 2008 prior to logging events

Released in the United Nations' International Year of Biodiversity, Smith's (2010) study also indicates that Australia has the highest mammalian extinction rate in the world.²

The Review's Private Native Forestry and Koalas discussion paper rightly attributes logging as a cause of the koala's demise. At the Bega meeting, an official remarked that there were no koalas in the SE Forests. May the Review remind the Minister that there is a breeding colony of only 30-40 'ancestral' koalas remaining in the SE forests of NSW. These are the largest koalas on the planet.

"... the SE NSW koalas are the most critical population in Australia in the sense that they may represent one of only two reservoirs, very small ones, of what is the native genotype of all the animals in Victoria and South Australia left". Dr Alistair Metzler, Canberra Senate Inquiry Proceedings, 2011.

Koalas have recently been listed as threatened. Spokesperson for the South East Region Conservation Alliance Inc., Dr Prue Acton, said that:

"... only about 30 of these genetically distinct koalas remain in SE forests and this genotype is only found there and in East Gippsland and despite the recent listing, they are still threatened by logging."

According to all the local koala experts with whom I have spoken, the concessions made to preserving their habitat by the Department are inadequate. Logging around their habitat will not ensure their survival because the capacity for territorial expansion and connectivity will be lost. These concessions spell the death knell for

¹ Environment News Service: CANBERRA, Australia, April 23, 2004 (ENS)
<http://www.ens-newswire.com/ens/apr2003/2003-04-23-03.html>

² *Australia's global footprint one of the worst*, Bridie Smith, May 6, 2010
<http://www.theage.com.au/environment/australias-global-footprint-one-of-the-worst-20100505-uape.html>

these koalas which, only 20 years ago, roamed in the thousands in the State's SE forests.

"... the principal Commonwealth law protecting threatened species, the Environment Protection and Biodiversity Conservation (EPBC) Act 1999, does not apply in State Forests". Conservationist, Harriett Swift.

The Koala discussion paper notes that the PNF Code of Practice includes additional protections where there is a known record or site evidence of koalas. It also suggests that the type of surveys required for the identification of core koala habitat is costly and time consuming. Thence the State has devolved it's responsibility to identify these threatened iconic creatures by suggesting that Councils be responsible for such surveys and amend their plans to include core koala habitat within environmental protection zones. May I remind the Minister that the State, and by obligation, the Commonwealth Government, is responsible for the logging operations and even if the Councils were willing to undertake a course of action to prepare KPsOM: their findings would be ignored and gazumped by the State's own RFAs.

If the contrary were so, no doubt the local Member and the Bega Valley Shire (BVS) Council would need to be informed and provided with the training and funding to conduct such surveys on individual and State native forest holdings. Table 1 in the discussion paper omits the BVS from KPsOM and neither are they presently being prepared.

SERCA spokesperson Ms Swift explained:

"Since the commencement of the RFAs there have been hundreds of instances of threatened species rules being breached either by Forests NSW or by logging contractors. A licence to log is a licence to kill and harm threatened species, to say nothing of the more common animals such as wombats and lyrebirds which are not protected at all."

Due to ongoing logging breaches by State Forest bodies, the notion of the advantage of 'trust' which the paper recommends be placed in private native forest landowners when determining koala habitat trees and koala presence, is hardly likely to be taken seriously.

The definition of 'core koala habitat', Fact Sheet 7, should be: *any trees or lands where koalas once lived, where they now live or where they could potentially live.*

&

Pragmatic environmentalists, scientists and local conservationists seem to be the least heard voice when important decisions are being made at governmental level. Such people have been campaigning, studying and researching long and hard since the woodchip operations began in 1965.

A pioneering Forester, Ray Hammond, was asked by the Crown to establish a woodchip operation in the SE NSW forests. It was bound by the initial recommendation that woodchips should only be supplied from sawmill waste. He

thought that this was impractical as supply and demand would be irregular. His prediction that a woodchip industry was environmentally damaging and economically unsustainable, has proven to be accurate.

Until the woodchip industry ceases, this country's remaining forests will continue to be degraded and will destroy our unique biodiversity, disconnect landscapes and impact on the health of the planet. How can any government department condone that logging any native forests is an intelligent first world approach to advancing the preservation of our forests for their own sakes and for our children from whom we have borrowed it?

Dr Bronte J Somerset

An unrealistic analogy

*Cadman cottage is located at Sydney Cove. It has been preserved for its architectural, historic and heritage values. A **Heritage** sub committee has been formed to discuss ways to 'manage' the application of graffiti found on its walls. Experts have met the artists and decided that only certain paints may be used, and on specific parts of each wall.*

*There are beautiful forests in NSW which should have been preserved for their biodiversity and environmental value yet fifty percent of them have been destroyed since colonisation. An **Environment** sub committee has been formed and met the forest owners to discuss ways to 'manage' destruction of these forests. Experts have decided that only certain trees may be logged, in certain quantities and in specific places.*

Logging of native forests is illogical environmental graffiti.