

# NATIVE VEGETATION REGULATION REVIEW

Comments by: -

EJ Byrnes

Lower Murray Darling Catchment - NSW

Email: [REDACTED]

## Option 2: Make the Native Vegetation Regulation 2012 – preferred option with some changes

Issue	Response
The removal of the Local Government RAMA	<p>The loss of the Local Government RAMA without a replacement to allow clearing for gravel pits to repair outback unsealed roads is a <b>negligent disregard for the safety of all road users</b>.</p> <p>We have very few sealed roads in our Shire of Wentworth in SW NSW &amp; the upkeep of our roads is vital as they are our only means of access to &amp; from our properties for medical, education, business &amp; private use.</p> <p>During 2010-2011 we were unable to drive on the unsealed shire roads in a 2x2 vehicle for 24 days out of 31 in one particular month. What a disgrace when we pay shire rates of almost \$300 per week. The shire could not access gravel quickly to repair the inaccessible sections of the roads &amp; as a last resort had to buy gravel from a local quarry. Minimal works could be achieved by the shire because they had NO budget funds to BUY gravel – also a waste of rate-payers money.</p> <p>Growers lost considerable amounts of income as produce (grain &amp; livestock) could not be moved off their properties for sale &amp; local businesses often will not deliver fuel, merchandise or livestock to our properties as the roads need repairing. Where gravel can be accessed &amp; used the roads are in much better condition. Mobile phone coverage is very limited &amp; access via roads is essential for emergencies &amp; accidents. We live in an isolated area of NSW &amp; need to be able to travel in safety.</p> <p>Gravel pits are all less than 2 hectares in size &amp; our catchment has over 93% of its native vegetation. <b>Offsets should NOT be required in the Western Division of NSW for shire gravel pits</b> where the majority of roads are unsealed. A simple property visit by a CMA assessment officer should be adequate to map &amp; inspect the site to ensure it is in low value vegetation.</p>

Issue	Response
<b>Social and economic impacts of the Regulation</b>	The Social and economic impacts of the regulation have not been adequately addressed. There is no encouragement to establish private conservation reserves/ <b>offsets</b> in the Western Division as financial institutions place <b>NO VALUE</b> on these therefore reducing the equity of landholders. I currently have over 11,000 hectares of private conservation that was valued at \$0.
<b>Decision making must be made at a local level</b>	Ministerial Orders for Codes of Practice must be the full responsibility of the relevant CMA Board. Local CMA staff & landholders, who are out in the field on a regular basis, possess the <b>BEST AVAILABLE LOCAL KNOWLEDGE</b> for local decision making.
<b>Lengthy waits for processing PVP's</b>	In August 2012 my application to modify a Development Consent that was originally issued under the Native Vegetation Conservation Act 1997 was approved. The application to modify was <b>lodged in April 2009 – over 3 years to MODIFY an approved development consent that had a large offset gazetted.</b> A 40 day service agreement for PVP's has been mentioned – landholders need certainty that the lengthy delays that I have experienced do not occur in the future. I could not budget or plan my business operations during this period & missed opportunities for increased returns, particularly during the high rainfall years of 2010 & 2011. These are on average only 1 in 10 year higher rainfall events.
<b>The Western Division of NSW needs to be treated separately</b>	The <b>Western Division</b> of NSW covers 42% of NSW with <b>over 93%</b> of the native vegetation retained & <b>NOT CLEARED.</b> Future development in the Western Division would only be on a small scale due to the low rainfall of the region. The area's that have been developed are in a window pane fashion with native vegetation surrounding the development area's & corridors connecting each development area to allow good coverage & habitat for fauna & flora. We should be rewarded for maintaining our native vegetation <b>NOT PENALIZED</b> by rules that are designed for the over-cleared landscapes further East & along the coasts of NSW. Much of the development in the Western Division is to allow for the use of the latest farming technology eg. precision agriculture & GPS tools & to achieve economies of scale in our agriculture enterprises.

<p><b>Single Paddock Trees within development areas</b></p>	<p>Paddock trees within cropping paddocks cause Occupational Health &amp; Safety risk issues. Many accidents have occurred in our region due to crashing into paddock trees using GPS technology. The GPS equipment that reduces over use &amp; wastage of chemical, fertilizer, fuel, time &amp; other cropping inputs should be encouraged not inhibited.</p> <p>Paddock trees eventually die out due to double exposure to chemical as machinery has to go around them.</p> <p>Single paddock tree clearing should be a Code of Practice RAMA so that landholders can remove them without the need for a PVP in the Western Division where over 93% of native vegetation has been retained.</p>
<p><b>Clearing of small remnants within &amp; around development areas</b></p>	<p>Most existing development areas were not designed for GPS technology &amp; do not have straight edges &amp; often have small clumps of native vegetation within the paddock. The area's that have been developed are in a window pane fashion with native vegetation surrounding the development area's &amp; corridors connecting each development area to allow good coverage &amp; habitat for fauna &amp; flora in a landscape with over 93% of native vegetation remaining.</p> <p>Streamlined PVP's need to be able to assess numerous small remnants in the same PVP application if it is to save time.</p>