

Environment Protection Authority  
PO Box A290  
Sydney South NSW 1232

**Via email: [Native.vegetation@environment.nsw.gov.au](mailto:Native.vegetation@environment.nsw.gov.au)**

23<sup>rd</sup> August, 2012

Dear Sir/Madam,

**Re: Comments on the Draft Native Forestry Code of Practice for Southern NSW - Native Vegetation Regulation Review.**

We thank you for this opportunity to have input into the PNF act, and welcome the opportunity to add our comment on the final draft of the native forestry code for Southern NSW.

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 commercial logging operations approved in the Mount Rae Forest, meet these goals? We 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.'

We have personally become aware of these private native forestry issues through the many articles that have appeared in local media, as well as the council development applications by a firewood proponent in Mount Rae Forest. We have also spent time in this forest and are aware that logging for firewood under PNF is now happening.

We have expressed our views in the past (both through local media and by bringing this matter to the attention of many others in our role as editors of the Southern Tablelands WIRES newsletter). Views that this operation will cause unacceptable environmental damage to Mount Rae Forest, and goes against all the efforts of environmentally responsible individuals and groups such as Roslyn Landcare and Greening Australia (Bird Watch Program) to retain and improve remnant vegetation, as well as planting connectivity corridors. We are licensed wildlife rescuers and carers with the Southern Tablelands branch of WIRES and are well aware of the multiple effects that clearing, fragmentation and loss of habitat are having on the wildlife of our region.

We have also been lucky enough to have seen the Federally listed threatened species the Endangered Buttercup Doubletail orchid (*Diuris aequalis*) flowering in this forest.

This same 'logging for firewood' operation was initially opposed by DEC officers of the Threatened Species Unit (south). It first came to the notice of the Environment Protection and Regulation Division after a non-resident landowner, but full-time firewood seller, clear-felled 3 ha. in this forest with a bulldozer. Local councillors also voted against any further clearing in this area by this business. We are confused as to why this same development has now been approved by the OEH – over-riding past council and former departmental objections to the operation. An area previously protected by council and the DEC now logged under PNF?!

Logging is happening in this forest without the requirement for any ecological surveys and without PNF PVP's needing to be submitted to the local (Hawkesbury-Nepean) CMA, as is the requirement for all other clearing applications. This is even stranger when surrounding lands have undergone substantial surveying and are known to contain 11 threatened species and nearly 250 species of fauna and flora in total.

Under the current PNF laws it is left to the developer to notify of species he finds on his lands. It's no surprise to us that this developer has identified nothing. Further, forestry groups who support firewood selling, have said this forest contains nothing of value, is in serious decline and that they wish to conduct firewood logging in ALL the forests of the region as they are 'dying, lacking in biodiversity and in serious need of human intervention' - human intervention in the form of clearing for firewood to sell in Canberra, Sydney and the South Coast! Easy claims to make when you don't have to conduct any surveys under PNF. This forestry network is now able to say that the OEH supports them and recognises logging and patch clear-felling for firewood as 'improving vegetation and protecting threatened species', as the Environment Minister has granted biocertification to their plans.

One has to look no further than Mount Rae Forest where, when surveys were actually carried out on surrounding lands, they recognised the lands to be in a healthy condition, biodiversity rich, containing threatened species and vegetation matching profiles of Endangered Ecological Communities.

**We ask, for the above reasons, that future legislation require meaningful, independent surveys prior to the granting of these approvals.**

The issue of the sole product of this operation (firewood) is reason alone for revoking the approvals in Mount Rae Forest. The idea that forestry groups wish to use PNF to target all the forests of the Southern Tablelands for firewood and market it for sale in Canberra and Sydney is a good reason to remove this loophole from legislation entirely.

To continue to allow this can only become a source of embarrassment for the NSW government, when their own websites talk about the predicted impacts of global warming caused by emissions from wood fires. Our forests store huge amounts of carbon and burning them as firewood can only be seen as counter to government advice. We are sure that now the Government is aware of some of the contrary issues presently existing, it will take action to change the PNF act so that this cannot happen in the future.

Government scientists have also declared that the Mount Rae area is valuable in a regional context for the landscape connectivity it provides. This is largely because of the award winning efforts bush regeneration by the local Roslyn Landcare Group. Such tree and wildlife corridor plantings should be encouraged. How much longer will people continue these efforts when they see the centre of landcare and local efforts logged for firewood?

Surrounding areas have been highly modified through past agricultural clearing and the remaining forested lands need protection for the biodiversity they contain. In the past we have personally spent time on promotions and displays throughout the Shire, on threatened species day and during biodiversity month, promoting the need to protect forests and trees on farms because of the loss of biodiversity occurring around us. It is ironic that most of the information we displayed actually came from NSW government departments.

Does the government not understand how disheartening it is for those with genuine conservation ideals to see the source of tree planting efforts, the source of local biodiversity and threatened species being logged? A non-resident developer and a forestry network claiming that the previously recognised values of this forest don't exist? That the OEH now recognises the need to improve this area (any area really) by logging? Does the EPA and OEH actually believe firewood merchants are conducting 'ecological logging regimes'? That they are just selling the wood as firewood to fund more improvements for the regions forests? We doubt that the public will accept this when they realise what is happening to our forests and wildlife. Yet the OEH now apparently supports these firewood sellers and have turned their back on those with genuine concerns for the regions biodiversity and the effects on future generations.

### **THREATENED SPECIES.**

The lands where we live contain the threatened bird species – the Gang-gang cockatoo (*Callocephalon fimbriatum*).

So does Mount Rae Forest. Not only does the landowner not have to admit to this species on his lands, but we have noticed that **the PNF final draft of prescriptions for Southern NSW threatened bird species does not list this species.** *The Gang-gang cockatoo has been listed as 'vulnerable' since 2005 – we therefore find this omission incomprehensible, and also inexcusable.* Because of this omission, even if the landholder admitted to roost trees he would not be required to invoke any protective measures. **How is this possible** when the OEH tells the public that there is an 'extensive' suite of prescriptions for threatened species, **when in the case of this particular species there is none?** PNF has been operating for five years. Why has the OEH ignored this species?

Departmental

conservation

advice

<http://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10975>

for the Gang-gang cockatoo states as follows:

### **THREATS:**

- **Clearing of vegetation and degradation of habitat** may reduce the abundance of optimal foraging and roosting habitat.
- Individual pairs show high fidelity to selected nesting trees (choosing nesting hollows of particular

shape, position and structure), with clearing and frequent fire posing a threat to continued successful breeding.

- Climate change may alter the extent and nature of its preferred habitat (cool temperate vegetation).
- Susceptible to Psittacine cirovirus disease (PCD) which is spread through contaminated nest chambers. PCD is known to have increased near Bowral in the southern highlands of New South Wales over the past decade and constitutes a further threat to the species.

**PRIORITIES ACTION STATEMENT:** (PAS) to promote the recovery of the Callocephalon Fimbriatum Gang-gang cockatoo:

**High:**

- Provide input to National Park and local bushfire management plans to minimise impacts of fire on critical resources.
- Determine the status of representative local populations distributed across the species range.
- Investigate the breeding biology of selected populations to improve understanding of threatening processes.
- Investigate the impacts of wildfire and hazard reduction burns on foraging and nesting resources.
- Model the impact of global warming and develop mitigation strategies.

**Medium:**

- ***Prepare and distribute information to decision makers.***
- Negotiate management agreements and covenants over important areas of habitat.
- Determine the disease status of selected populations.\*
- Identify important nesting habitat on public lands.

**Low:**

- Increase landholder and public awareness of status, threats and priority actions.
- Investigate movement patterns of selected populations.



A female Gang-gang cockatoo presently in rehabilitation with Ms. McDonald, following injuries received in a motor vehicle collision at Crookwell, in the Mount Rae area.

*\* When making its determination, the Scientific Committee relied on information supplied (amongst others) by 'McDonald P (1995) Gang-Gangs in the southern highlands of New South Wales. Observation in the wild and notes on foster care. (Privately Published: 56 Woodbine St, Bowral NSW 2576)'.*

*We have had an ongoing association with Ms. McDonald (now of Fitzroy Falls) - a highly respected authority on the Gang-gang cockatoo - for several years, and are therefore aware of the continuing decline, and increase of Psittacine cirovirus disease (PCD) within this species.*

*We thank you again for the opportunity to comment and have input into this most important review.*

*Yours sincerely,*

*Kay Muddiman*

*Dallas & Kay Muddiman*

**Dallas & Kay Muddiman**

**Crooked Corner NSW 2583**