

Sent to: native.vegetation@environment.nsw.gov.au

Jim Morrison

██████████ Mallanganee NSW 2469

Submission on the Review of Private Native Forestry, August 2012

To whom it may concern

I welcome the opportunity to comment on the review of NSW Private Native Forestry Regulations

I have a formal background in Geography and Planning and in ecology. I have represented NSW Conservation and community interests on many Natural Resources planning and advisory groups over the past twenty years.

I have been involved in the development of regulations governing forestry practices on private land for more than ten years. I was part the NSW Natural Resources Advisory Committee (NRAC) PNF Sub Group representing conservation interests in discussions leading up to the development of the PNF Code of Practice in 2007. I then became part of the NRAC Primary Industry and Economic Development Sub Committee and PNF Sub Group which was the key consultative body for developing PNF legislation and the implementation of the 10.1 million dollar NSW Environmental Trust, Private Native Forestry Business Plan from 2007-2011.

I have also been Chairman of the Bell Miner Associated Dieback Working Group for more than ten years. This group of diverse industry, government, community and conservation stakeholders has worked co operatively to attempt to address this significant threat to forest health. The BMADWG has received millions of dollars Commonwealth and State funding over the past ten years to undertake quality scientific research, on ground adaptive management trials, and community education regarding causes and ways to address BMAD. (see www.bmad.com.au)

Given the significant Environmental Trust funding allocated to the development and implementation of Private Native Forestry in NSW I believe the people of NSW should be appalled at the perverse outcomes for conservation which have resulted.

A good example of this is the wrongful reassessment by PNF Staff, of extensive areas of Old Growth Forest, and it being made available for logging under PVP approvals. Old Growth forest is rightly regarded as among the highest conservation value terrestrial communities.

Even slightly disturbed old growth is likely to provide critical habitat for a raft of threatened species, particularly hollow dependent arboreal animals. The declassified, mature forests can now be logged without appropriate on ground flora or fauna surveys and with minimal prescriptions to protect threatened species and little if any effective compliance of operations in remote locations.

Another example of a perverse outcome from PNF CoP is the ongoing fiasco regarding the effective protection of koalas and their habitat through logging operations. The prolonged and ongoing stalling by authorities to act to prevent PNF approvals being issued in key areas of koala habitat further highlights how insincere the government is in its commitment to protect koalas. If koalas cannot be protected from logging in mapped core koala habitat (eg Coffs Harbour Council) what hope do less iconic but more cryptic endangered species have for protection from loggers. Rather than arguing semantics about core vs Primary secondary or tertiary habitat, the precautionary principle should have been invoked at the outset, with all koala habitat adequately protected. The reliance on SEPP44 provisions to protect koalas from logging is virtually worthless across most of the animals range. Site specific surveys, scat searches and effective provisions to protect koalas and their potential habitat across the landscape is always what has been required.

By not requiring site specific flora and fauna surveys PNF COP encourages ignorance as an excuse to destroy threatened species and their habitat. Volunteers involved in bush regeneration and especially wildlife rehabilitation should be appalled by this current PNF situation.

As another example of a perverse outcome from the Environmental Trust funded PNF project I refer to the disaster that will become of Mt Rae in the Southern Highlands where thousands of hectares of high conservation value forest is to be decimated by logging for the firewood industry. Despite the fact that local wildlife carers and landcare volunteers have documented a range of threatened species on the site, they can do nothing to protect them from this insatiable industry. (refer to submission provided by Mark Selmes for details of the appalling, shameful destruction which has been sanctioned by our environment department at Mt Rae.)

Rather than providing effective regulations to protect important biodiversity from logging the outcome of the PNF CoP has been to open up vast areas of steep upper catchments which was formerly better protected under the old Soil Conservation Act protected land category, for logging. These steep lands contain that last extensive tracts of big trees due to the long term protections of the past regulations. These are the areas where the bulk of the old growth was wrongly reassessed and made available for logging. Perhaps most importantly these areas form the backbone of the Great Eastern Ranges corridor initiative. Although extensive government funding and community volunteer effort has already gone into the GER, this initiative has been severely compromised and undermined by PNF legislation which is a tragedy for the wider community.

A major disappointment and concern is that Bell Miner Associated Dieback has not even been mentioned in the PNF review. This is despite its fundamental and severe threat to forest health over extensive areas. BMAD was declared a Key Threatening Process in 2008. This listing was considered a major achievement of the BMADWG. However to our disappointment the listing has made absolutely no difference to government policy or regulation.

I May 2010 I gave a presentation on BMAD to the full NRAC committee. The presentation was prepared, endorsed and given on behalf of the BMAD WG. NRAC stakeholders were shocked to learn of the seriousness and extent of the situation. They generally agreed to support action to help address the problem, which was referred to the PNF Sub Group.

The linkage between lantana invasion and the development of BMAD in at risk forests is relatively well understood. Likewise is the relationship between unmitigated vegetation disturbance and lantana invasion and thickening.

Through the PNF Sub Group I explained the need for effective post logging weed control in BMAD at risk forests to be to be a mandatory requirement of logging approvals.

Regulations state that logging undertaken within the provisions of the PNF CoP supposedly maintains or improves environmental outcomes. It is self evident that any logging disturbance which initiates lantana proliferation and the development of BMAD cannot make this claim.

I was advised by senior PNF staff that the best opportunity to have BMAD provisions incorporated into PNF regulations was at the review of the PNF COP in 2012. I am extremely disappointed this issue has not been mentioned in the background papers for the current review.

Since its determination as a KTP in 2008 government has been loath to complete the required 'Statement of Intent' for BMAD. I believe that OEH is failing in its responsibilities under the Threatened Species Conservation Act to fail to attempt to address BMAD at this opportunity in the review of the regulations.

There are a plethora of extensive failures of the PNF regulations to properly protect the most important aspects of our environment which should be addressed in this review. I have made contributions to the submissions prepared by the North Coast Environment Council as well as the states peak conservation groups ELO submission and fully support all points raised in submissions by these groups

Yours sincerely

Jim Morrison.