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Office of Environment and Heritage
To Whom It May Concern

24 Aug 2012

Re: **Submission to Draft PNF Code August 2012**

About Koppers Wood Products Pty Ltd

The core business of Koppers Wood Products (KWP) is the production of preservative treated and manufactured poles and timbers. The availability of timber resource and a procurement strategy is critical to achieving the company's overall strategic objectives and goals.

KWP has three pole plants located on the east coast at Grafton (NSW), Takura (Qld) and Longford (Tas). A fourth pole plant at Bunbury WA provides timber treatment services only. The pole plants supply treated poles primarily to Utilities for critical infrastructure in Australia and nearby countries. KWP is a long term core supplier of quality treated wooden poles procured from sustainably managed safe forest operations on both State and private land.

Koppers therefore has a great interest in the PNF Code of Practice relating to the private property forest resource in NSW. In particular Koppers is concerned with the long term sustainable supply of hardwood poles from this resource. The maintenance of forest structure that is conducive to producing this high value product is the primary aim of Koppers submission at this time.

Koppers has some issues with the Draft PNF Code of Practice

1. **Previous Submissions Ignored** As part of the public consultation process OEH held forums across key area of NSW. Koppers representatives attended the public forum at Grafton 25/11/11 and contributed to the review. A copy of all submissions collected on the day was summarized by OEH and distributed to attendees. It is alarming that worthwhile contributions have been ignored and none have been included in any form in the Draft Code of Practice. Many of these submissions proposed a decrease in regulation and clearer pathways for holistic forest management for production and conservation. None of these ideas have been adopted in the draft.
2. **Basal Area Limits** It is acknowledged that many PNFs today are in poor condition from past high-grading practices or a lack of forest management. Hence the development of the PNF Code and greater regulation. However the setting of high basal area retention levels in the PNF Code limits the potential to restore forest productivity and health. This limits the potential economic value of the forest and the means to manage for production and biological values. The abundance of low grade wood material in the PNF is a perennial and fundamental problem for forest managers. The proposed silviculture rules and basal area limits set in the PNF Code are too inflexible to permit a silvicultural reset of degraded and stagnating forest. Forest owners are not able to practice effective silvicultural treatments to improve forest condition. This has serious implications for forest health vigor and productivity into the future.

3. **Multiple Consents** This matter was raised in past submissions and at public forums. Landholders are obliged to seek consents from various departments depending on the activity proposed for the one landholding. Application to CMA for clearing, OEH for PNF, DPI for plantations and local councils for DA. The overlapping regulation is rarely seamless and highly inefficient. This should be a one stop shop with PNF-PVP overriding council regulation.
4. **Ecological Harvesting Plans and Forest Operations Plan Amendments** The requirement for landholders to engage an "accredited expert" for any forest operation that does not meet the letter of the PNF Code is an unacceptable burden on landholders. Even minor things like use of an old dump site within a buffer zone) is time consuming costly and focuses on process rather than environmental outcome). The set of expertise required by the "accredited expert" is not defined in the PNF Code or definitions. This requirement takes forest management out of the hands of the owner and into the hands of a likely costly "consultant" third party. This circumstance is better addressed by extension officers experienced in outcome based environmental solutions as a resource to PNF owners.
5. **The Increase in EEC types and restrictions.** EEC are not mapped and require the PNF-PVP holder to identify and institute prescriptions. This is difficult as the EEC's proliferate and "experts" seem unable to agree on what vegetation types constitute an EEC. What chance has a PNF owner to deal with a difficult area of interpretation.
6. **Koala Habitat Protection** The provisions in the existing PNF Code are adequate to identify and protect koala habitat and least costly. Again there is a strong case for extension services to provide the knowledge and expertise to promote greater awareness among PNF owners.
7. **Time for review of Old Growth and Rainforest** Scheduling forest operations to provide for continuity of work is more difficult where delays are experienced in seeking review of Old Growth and Rainforest. Over time it drives skilled forest labour from the forest and reduces the contractor capacity available for sustainable forest harvesting. The responsible forest agency should have the information and resources available to deal with this in a timely fashion.
8. **Notification of Start and Finish of Operation** This requirement places increase onus on the PNF owner and has the potential to draw vexatious complaint and interference in authorized and compliant forest operations by anti-logging campaigners.
9. **PNF Owner Support-** Koppers have previously submitted the need to boost education and extension services in PNF management and have been an active participant in these activities alongside departmental staff (PNF Awareness Course). The success of this program funded by OEH and delivered by DPI has been significant in raising awareness about forest management generally. Full time extension officers knowledgeable and experienced in forest management should be engaged by the department to assist PNF owners.

Regards

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Enduring Wood - Naturally Better