From:

Sent: Friday, 24 August 2012 9:02 PM

To: EHPP Landscapes & Ecosystems Section Mailbox **Subject:** Review of Native Vegetation Regulation - PNF

SUBMISSION: Review of the Native Vegetation Regulation: PNF and Koalas

From:

Coffs Harbour 2450

A 45ha section of our Coastal Northern NSW farming property has been selectively logged under our ownership three times in the last fifty years. Harvesting activities took place most recently in the early 1980s and again six years ago when 60 truck loads of timber were forwarded to Grafton. Facilitating the short rotations are the good soil, good moisture and warm climate and our invasive weed management. We also manage for wildlife, never touching the tallowoods or the old growth hollow bearing trees and, until recently, continuing to add to the over 1000 fleshy fruited rainforest species planted for the (usually forgotten) frugivores. We regularly bait and maintain a no dog/cat policy.

Logging activities have allowed us to smooth out the ups and downs of both banana prices and cattle prices. Logging activities & management have allowed for a mixed age vegetation with neither germination nor growth inhibition from invasive weeds. Our native vegetation, blackbutts, flooded gums and brushbox, is a core asset.

Our aim is to maintain productivity and maintain biodiversity. It is not always easy to understand legislation and the dual approval process for PNF is confusing. I draw attention to the original failed policy of years ago of land clearing when, if land was not fully cleared, ownership was lost. We now have another flawed policy, and I am only referring here to what I know is happening in our case, that being our well managed and wildlife diverse native vegetation is to be locked up and NO LOGGING RIGHTS to be granted under local Council zoning. The logic behind the decision to reclassify this property for 7A habitat protection zoning with its history of logging needs questioning.

Would the fact it is now recognised as good habitat not indicate our logging practices have been exemplary?

If we had logged unsustainably or in a poor manner having no regard for good practice guidelines, would not this habitat have been eliminated under 7A zoning?

Councils with short term agendas, need to be taken out of the equation in order to provide landholders with some certainty in their long term decision making. As an example, since the last selective logging took place, we have carried out thinning activity, a necessary management procedure, on the assumption pre-existing and continuing use rights would carry on. The EPA should be the only consent authority. Council have no forestry expertise and have with a stroke of a pen sterilised this property causing a huge loss of income and negating many years of planning and maintenance and with no considered outcome regarding weeds, fire, feral animals or compensation! See attached email.

It is the huge increase in population in this area from 27,000 to 70,000 in 13 years with associated land development for new houses/new roads/dogs that show newspaper/radio documented effects on dwindling koala numbers. A hundred times more koalas are killed or have PERMANENTLY lost their habitat than has ever occurred with selective logging in our own personal experience. We have reared orphaned koalas and have looked after Chlamydia affected and dog/vehicle injured koalas that have been passed on to us, as registered carers, over several years. Because of the increasing **politicising** of koalas we have not accepted any into our care for over ten years, however, we continue to take an interest in their welfare from the sidelines.

Working with farmers would ensure a better outcome for the future of koalas and provide certainty and long term security over timbered properties. The mindset needs to be one of "how wonderful, we have a koala in a tree" rather than "oh, a damn koala in the tree". One does not need to be a genius to work out which attitude leads to which outcome jeopardising either the koala or the farmer with a timber resource that is likely to have a limited future.

No higher penalty can be put on a farmer than the loss of income and loss of use of his land that has generally been sustainably maintained over generations. The discrepancy & inconsistency of the classification of koala habitat as being "core" needs addressing. There is a difference between good koala habitat and forest containing koala trees & the classing is just wrong. Koalas are species specific and, we have noted, specific within that species. A great majority of our koala feed trees have never hosted a koala

and mostly those sighted appear to be dispersing young animals. We have only ever seen one breeding female with back young. All the tallowoods that have always been here nevertheless are retained willingly. Our choice. At some stage we believe we would need to take a limited number to allow a break in the canopy to encourage unshaded natural regeneration.

We also believe that under the PNF guidelines, koala protection is adequately covered and would enable us to do this limited harvesting as well as enable larger scale logging for other landholders.

Recognise please the following if the object is to save koalas and not politicians:

- 1. The major cause in the decline in the number of koalas is increased population and **urban development**, known to us through our history of wildlife care and reinforced by a recent ABC TV programme with the long term experts in the field.
- 2. Simplification and more widespread baiting for wild dogs/foxes. (In our case necessitates a round trip of 160km plus notification of 30 surrounding neighbours.)
- 3. **SELECTIVE** logging, in our experience, has shown not only is no threat but is beneficial as browse from younger regeneration is preferred. Old trees are not utilised.
- 4. Give some security to landholders so koalas are not viewed as the enemy forcing people into making decisions they would otherwise not make
- 5. Do not penalise landholders who lightly log & practice conservation on unoccupied and on potential habitat, whilst ignoring Local and State Government decisions which lead to **permanent** loss or fragmentation of habitat.
- 6. Have consistency in habitat description and identify the existence of koalas as mature breeders or dispersing juveniles passing through a patch of identified koala feed trees on their way to an area that is supportive of a permanent presence. Done in conjunction with habitat mapping. Paid for from either an environmental levy or from general ratepayer funds, those generally who desire habitat identification and some overseen protection

shared proportionally with the landholder. Both are beneficiaries of koala surveys.

7. Might be better to define overall as "likely" habitat whether core or whether occupied or unoccupied and retain as many trees as practical but logging at the same time. EPA should define the density to leave and the density to log. Not sure if this would be burdensome to oversee.

CONCLUSION: It is just too easy and too convenient to point the finger at logging and prelogging surveys may not be commercially viable but we feel the KPOM has only been of advantage to subdivision development and of little use in reality for koala protection.