

Native Vegetation Regulation Review
Environment Protection Authority
PO Box A290
Sydney South NSW 1232

Comments on the Draft Native Forestry Code of Practice for Southern NSW

Environment and Protection Authority,
24 August 2012

Dear sir/madam

Thank you for this opportunity to comment on the current draft code for native forestry in Southern NSW.

My personal experience with the current draft is a consequence of issues arising from clearing for firewood in the Mount Rae area. I have made extensive studies of the vegetation within the greater Goulburn region over the past two decades.

I am surprised and disappointed that this code has overlooked the past objections of government scientists and local Upper Lachlan Shire councillors. I am also aware that the code appears to largely rely on self regulation by the developer and appears to contain no requirement for any independent environmental surveys.

Notable flaws in the final draft code include that threatened species habitat and Endangered Ecological Communities are permitted to be logged and that there appears to be no requirement for environmental surveying prior to logging approvals being granted. I am also concerned that the one particular PNF forestry operation in our region, in the Mount Rae area, is being conducted for the purpose of firewood harvesting. I cannot believe that this is in the spirit of the Native Vegetation Act or that the current code can meet the intentions of the Threatened Species Act.

Species identification and logging prescriptions seem to be a complete variance with well known and easily observed data in the field. A typical example of this is the neglect accorded *Eucalyptus fastigata* Brown Barrel. Advice from others in the region who have many years of combined experience as botanists and/or environmental consultants is that they have seldom encountered this species south of the Blue Mountains and Wombeyan areas. Advice is that Brown Barrel is a locally very uncommon species occurring in rare islands of suitable habitat in this district.

Narrow-leaf peppermint *Eucalyptus radiata* is a species with a similarly restricted range. Like other tall eucalypt species affected by logging at Mount Rae, it has been greatly reduced in range and this once locally abundant species now most commonly occurs in isolated stands of poor-quality regrowth, often on less environmentally favourable sites. Advice from NSW Government ecologists who have conducted detailed botanical studies in the Mount Rae forest have identified that the *E. radiata* forests match the profiles of the Endangered Ecological Community Tablelands Basalt Forest.

The shade of the tall eucalypts affords shelter for a significant diversity of understorey plants that are susceptible to desiccation and alteration of soil and forest structure implicit in most mechanical logging operations. The diversity of terrestrial orchids noted by visiting orchid specialists in this forest is remarkably high for this part of the world and is in my opinion undoubtedly supported by the structural integrity of a tall open forest.

The turnaround time for the logged forest to attain optimal conditions for hollow-dependent mammals and birds is grossly insufficient to allow for habitat renewal within the life span of the affected fauna or of the associated forestry operation.

Natural attrition rather than removal by logging would significantly enhance habitat values by virtue of a more ragged, more extended timescale and by affording improved habitat components in terms of the presence of fallen logs.

One threatened species well established as currently occurring in the affected area is the Buttercup Doubletail (orchid) *Diuris aequalis*. Due to its threatened status and the requirements under the TSC Act, no development of the site should be permitted until adequate surveys are conducted by professional expert capable of assessing the impact on this local population.

For the reasons given above I would ask that changes be made to the code as it currently stands to ensure that independent environmental surveys are provided before logging approval and during forestry operations to guarantee compliance. This highly significant Code of Practice, foreshadowing potential legislative changes must explicitly exclude the any allowance for commercial firewood harvesting.

Yours sincerely,



I would also ask that my personal details be withheld from publication without my prior knowledge and written consent.