

From: [REDACTED]
Sent: Friday, 24 August 2012 10:51 PM
To: EHPP Landscapes & Ecosystems Section Mailbox
Subject: Native Forestry code

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

This submission is on behalf of the Southern Tablelands Group of the Australian Plants Society.

We thank you for this opportunity to add our comments.

Our experience with the current draft code has made us aware of some perverse outcomes being delivered under the code: particularly that threatened species habitat and Endangered Ecological Communities are allowed to be logged under the present code and that currently there is no requirement within the code for environmental surveying prior to logging approvals being granted. We are also concerned that the one particular PNF forestry operation in our region is being conducted for the purpose of firewood harvesting. We do not 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 when species identification and prescriptive approaches to threatened species rely on self regulation from firewood sellers.

Our group has visited a property bordering those involved in firewood logging in the Mount Rae area on several occasions and has been delighted by the range of orchids, other forbs and the magnificence of the tree species found there. Members of the Canberra Region (Australian Native Plants Society) have also visited the site as Mount Rae was one of the first places to come to mind when considering where to take them on a 2007 visit.

The forest areas in our district are sadly very limited ; thus it is vital that Mount Rae be retained in as good a natural condition as possible.

It is well known that landcare groups throughout the Goulburn/Crookwell/Taralga districts have been putting in many hours of work to develop woodland, forests, wildlife corridors and refuges in order to enhance the local environment for indigenous provenance species . This is not to mention the hundreds of thousands of dollars that have also been granted for works by both Federal and State Government agencies on behalf of the population of Australia . The firewood developer has put forward an argument that this native forestry project will improve the condition of the Mount Rae forest as he considers that opening up the forest under the code will enhance the understorey . This is not so; what in fact will happen is that the species diversity that can be found at present will be severely reduced. The proposed scale of thinning suggests that the developer wishes the trees that remain to grow to their fullest potential for later logging. The species in this forest will naturally thin themselves, a normal forest process, allowing for the continued growth of individual trees.

Our society is aware that botanical studies in the area have identified the narrow – leaf peppermint (*E. radiata*) forests of Mount Rae as matching the profile of endangered ecological communities. Fragmentation of all forest types in the district has occurred over the last 200 years. This forest is one of the larger areas, is in better condition and wildlife corridors are being constructed to link to it.

At present there are very few (exotic) weed species to be found there. The presence of bracken (a native) in the forest is scattered with no dense stands, however on the edges where past clearing has occurred bracken has become the dominant species. Reduced canopy cover in the forest will stimulate greater growth of bracken to the detriment of other species.

The presence of Brown Barrel, *E. fastigata*, identified by our members and mentioned by the developer in past applications to Upper Lachlan Shire council to conduct forestry in this forest (and subsequently denied) may be the most westerly occurrence of this species in the area as it is found more on coastal escarpment and adjacent ranges.

Regarding the threatened flora species of the area, the Buttercup Doubletail orchid, *Diuris aequalis* is known to occur. A full and complete survey needs to be carried out over a period of time to identify further locations of this species.

The area of Mount Rae forest is of vital importance and it would be a tragedy to lose it to logging for firewood. For this reason we would ask that changes to be made to the current draft of the code include the need for environmental surveys and exclude the misuse of the Act through allowing commercial firewood harvesting.

Yours sincerely,

Tim Hayes
c/- APS Southern Tablelands
481 Mount Baw Baw Road
Goulburn
NSW 2580