

From: Denis Wilson [REDACTED]
Sent: Saturday, 25 August 2012 11:02 AM
To: EHPP Landscapes & Ecosystems Section Mailbox
Subject: Fwd: Draft Native Forestry Code of Practice for Southern NSW

I sent this in yesterday, but unfortunately there was a minor error in the address, and it "bounced".

Kindly accept this submission as if it had been received yesterday.
Grateful confirmation of that fact.

Denis Wilson
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Robertson NSW 2577

Public comment on the Draft Native Forestry Code of Practice for Southern NSW

Native Vegetation Regulation Review

Environment Protection Authority

PO Box A290

Sydney South NSW 1232

I wish to make a general comment about the Draft Native Forestry Code of Practice for Southern NSW.
However I base my comments on my personal experience with the relatively small area of forest known as Mount Rae forest, between Taralga and Crookwell.

This area has suffered from planning inactivity, and bad understanding of the role of Council - the Upper Lachlan Shire Council.

Similarly, it is within the catchment of the Hawkesbury Nepean Catchment Management Authority, but within the Upper Lachlan Shire (which is generally outside the area of the HNCMA). So the HNCMA has been slow to respond to cries for assistance.

Both those factors are relevant to the case before you.
I would ask that the perceived lack of bureaucratic support ought to be seen to disadvantage the people wishing to protect the Mount Rae forest habitats.

I ask that you consider their relative lack of bureaucratic support as a reason why you ought in fact consider their case more carefully, to help make up for the deficiencies of other Local and State Government Agencies.

As I understand the issues before you, they are :

1. the need to ensure that genuine independent and professional Environment Assessments be required in each and every application for logging in this area. I know this does not currently happen. Indeed, I also have witnessed truckloads of timber being delivered to the local Firewood "depot" - when in fact he has a licence or permission to harvest timber from his own property. Does he have permission to harvest on other properties, or from outside the Mount Rae Forest?
2. that logging, if it is to be approved, ought be for harvesting of lumber, not chopping down trees for firewood. These are, of course, totally different methods of logging, with totally different outcomes. The firewood option, also results in burning of the timber harvested, resulting in the very worst form of Carbon Dioxide pollution. In the context of national and international concern about CO₂ levels, you have an obligation to consider this factor. That is doubly so because, in rural NSW (where the local firewood merchant sells Mount Rae "firewood", most houses have old fires, open fires, ones which are not subject to the modern BASIX system.

- **"Building Sustainability Index**, ensures homes are designed to use less potable water and be responsible for fewer greenhouse gas emissions by setting energy and water reduction targets for house and units. BASIX is one of the most robust sustainable planning measures in Australia, delivering equitable and effective water and greenhouse gas reductions across NSW."

Source:

http://www.esdconsulting.com.au/index.php?option=com_content&view=article&id=15&Itemid=8

- That only applies to new dwellings, yet most of the areas where local firewood is sold from Mount Rae Forest have very high proportions of old houses, with open fires - the very worst way to burn firewood. I live in Robertson, 150 km from Mount Rae, yet I know the supplies of Firewood at my local Garage come from Mount Rae forest. I have personally verified this with both the garage owner, and the [REDACTED] himself. I have seen him in Mount Rae, and delivering bags of firewood in Robertson, and I

even spoke to him about it - (he was not happy with me taking an interest in where he gets his firewood, but he did not deny it.)

Therefore if your Agency approves firewood use for the timber from Mount Rae, your Agency is approving, or worse, promoting, a highly polluting end use of the forest you are responsible for.

That is hardly appropriate for the EPA. At least saw log harvesting does not increase CO₂ levels in the global atmosphere.

3. There is a serious issue with Endangered Species within the Mount Rae Forest., which is not being adequately addressed. Specifically I can talk about the *Diuris aequalis*. the Buttercup Doubletail Orchid. It is listed both on the Federal and State threatened Species listings. Despite both these listings, the local *Diuris aequalis* populations in Mount Rae are being put at risk by clearing for firewood and grazing, with no Governemnt or Council body, group or individual accepting any responsibility for their own failure to exercie their legal responsibilities under either or both sets of State Legislation.

In lodging this submission I would ask that you kindly accept your full legal responsibility as a NSW Government Agency to:

1. on a local or State basis to do all in your power to protect NSW Threatened Species, (by at least ensuring that any forestry actions by individuals are at least fully professionally assessed for Environmental damage, before being approved)
2. and at a National level, to do all in your power to protect a Federally listed species, (by at least ensuring that any forestry actions by individuals are at least fully professionally assessed for Environmental damage, before being approved)
3. and finally, at a Global Level, to limit Carbon Dioxide pollution of the atmosphere, by NOT promoting the harvesting of a living breathing forest, in order for it to be burnt as Firewood, especially in view of the propensity of firewood to be burnt in open fires in the regions where the firewood parcels are sold (bearing in mind the comments before about BASIX code not being required to be met in pre-existing houses). That "loophole" is understandable, but for your Agency, being aware of that "loophole" being so freely exploited, that actually ought be seen as a reason for you to restrict, rather than promote harvesting for forests for firewood burning. If these forests

were being used for Saw Logging, it might be different. To turn a blind eye, because it is "just for firewood" might be perceived by the courts as negligence.

Yours sincerely

Denis Wilson

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"The Nature of Robertson"

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