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Minister for Environment
The Hon. Robyn Parker MP
Via email: native.vegetation@environment.nsw.gov.au

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Dear Minister for Environment, the Hon. Robyn Parker MP and the Office of Environment and Heritage.

Subject: Review of the Native Vegetation Regulation and PNF Code of Practice.

As a land owner with a Private Native Forestry enterprise I wish to draw your attention to the issues that are affecting positive change in this field, and to look at actions for improvement.

History

My wife and I are first generation landholders having bought a 321 acre property six years ago for lifestyle reasons. We worked very hard to purchase our property and feel we have earned the right to manage its resources, including creating a succession plan for (our children and) future generations. Having travelled extensively throughout Australia and internationally we feel we have invested into one of the world's most valuable areas.

When purchasing our property we were told by locals that our land was unproductive and worthless as it was all native forest and had been logged several times, the last being approx 2001. Not being from an agriculture background the idea of owning a native forest appealed to us as trees do grow back!

What we were unaware of was the problem of invasive species taking over after previous logging instead of quality regeneration. The ongoing costs and time associated with controlling invasive & noxious species alone brought us to the conclusion that the property would need to pay for itself.

Education Strategy

Having decided to become primary producers we commenced a study pathway to develop and extend on the skills and knowledge required to effectively manage a Private Native Forest.

We have completed the following courses and activities:

Sustainable PNF TAFE Suite of courses

- PNF Planner & Supervisor courses
- Department of Industry & Investment PNF Field Days
- Master Tree Growers program

And are currently studying for a

- Diploma in Conservation & Land Management and Micro Business Operations.

We have found that we are well suited to the PNF field and are planning on a long future in Ecological Forestry. This includes the creation of a Forest Restoration Business to assist local and regional landholders to sustainably protect, restore and manage their native vegetation and resources.

Overview of Issues encountered

Drawing on personal experience, our property was logged prior to the 2007 code of practice (before our ownership) The property was high graded (i.e. High Grading - the practice of “take the best and leave the rest”) this appears to be a common practice as stated by 8 out of 10 cases of landholders we have met with. The rapid spread of invasive species (introduced & native) and the lack of quality regeneration have left many forests of the region, including ours, with a poor triple bottom line social, environmental & economic. This has led to a shortsighted view to forestry by many people currently working in the industry.

The cycle of the forests is currently in a protection, restoration, regeneration phase with a shift to long term Ecological Forestry management. The majority of government rules, restrictions, industry trends and traditions we feel focus on the harvest phase.

Through our research & studies we have encountered the following issues:

- The relationship between Native Vegetation regulation and PNF code of practice requirements when compared to Forestry industry traditions, trends and economies of scale are not aligned.
- Ecological Forestry is restricted through current industry traditions and economic liabilities.
- Environmental damage caused by high grade logging (as defined above) lacking sustainability management.
- Poor triple bottom line social, environmental & economic.

Suggested Action:

- **Check current legislation in all departments related to land management to ensure that it positively encourages, restoration, silviculture and sustainable resource management and that such management practices are encouraged and not restricted, penalised or undermined.**
- **Allow a reduction in Basel area and increase gapping allowances whilst doing silviculture thinning, regeneration or restoration operations if necessary.**
- **Actively identify requirements that could be relaxed during restoration/regeneration activities to help reduce costs**

Valuing the important role PNF landholders play within the Forestry Industry and offering long term security over the management of their investment.

Duration of PNF Property Vegetation Plan

A common concern amongst Private Native Foresters is what will happen when the 15yr PNF Property Vegetation Plan comes up for renewal. Currently there is no contractual security for a further 15 yrs and/or beyond. Considering the significant investment of establishing protection, restoration and long-term Ecological Forestry management practices of a PNF, 15 years is a short cycle to achieve a long-term sustainable triple bottom line.

I would hate to think that PNF owners would be put in a position where they had to intensively harvest their forests on the 15th year due to the uncertainty of their future opportunities to continue sustainable management. Worse still, they could feel that the risk was too high to even invest in sustainable management of native forests in the first place!

Suggested Action:

Provide long-term security over land holder’s investment

- A 15yr x 15yr x 15yr style agreement would provide the security to look at long-term management approaches and benefits during restoration and regeneration. This would also assist with succession planning.

The spread of invasive native species (mainly riparian grape vine species)

In wet sclerophyll forests, invasive vines are encroaching on and/or taking over areas which were previously home to hardwood species with a mixed mid and under storey of rainforest species, hardwood regeneration, rare herbs and ground cover. Thus biodiversity was once stronger with natural resilience against weeds, pests and threats.

The spread of invasive native species (mainly riparian grape vines) beyond their normal habitat is cause for major concern; as is the uncertainty of government rules & restrictions that inhibit immediate & long-term action to control their invasion. These vine species, for example but not limited to Kangaroo Vine (*Cissus antarctica*), are quick to respond after large scale disturbance of riparian zones during harvesting in wet sclerophyll native forests. When paired with a lantana undergrowth and weed vines they suffocate upper storey trees, suppress any regeneration and create a habitat for pests.

Before man started managing native forests these rainforest vines would have assisted rainforest regeneration after a natural disturbance. They provide a food source and shelter for rainforest birds and animals and, in remnant rainforests, were not invasive. However, due to the intensity of man's previous harvesting methods these native species have become invasive and have caused a loss of biodiversity.

With increasing warmer/dryer weather expected in the future these leafy vines become a fire threat and, when combined with lantana under storey, create a high risk of Bell Minor Associated Dieback (BMDB). Control is needed until restoration activities are completed and a biodiverse canopy established.

After discussions with the CMA and EPA, this can currently be achieved by cutting the vines back without killing them or, under the PNF code of practice, by Australian group selection (AGS) techniques (gapping). However, gapping is only allowable over a small area of the overall property.

Its natural control is fire although this has been infrequent and, with the past 3 wet years, new growth has been rapid. If left unmanaged, when we have our next dry summers or years, it will burn hot and destroy existing rainforest species surrounding these areas. Our intention is to reduce the risk of fire on our property by only doing ecological burning.

Suggested Action:

Riparian grape vine species should be:

- **on the invasive native species list or**
- **included in the environmental works RAMA and**
- **regulated under the proposed codes of practice to ensure management control is only undertaken when vines are out of their natural area or hindering natural or assisted regeneration.**

It would then be possible to control the outbreaks in a cost effective way without uncertainty, requiring repeated approvals and government red tape or gapping (AGS) when not appropriate or required.

My concern is the time and expense involved in long term cutting back of these vines that have begun to seed and spread out of their normal habitat of the rainforest whilst a biodiverse regeneration is being established & implemented.

Issues raised:

- **A lack of policies and regulations that support cost effective long term regeneration/restoration of Private Native Forests**
- **Being able to go below min. harvest basal area and increase gapping allowances whilst doing silviculture thinning, regeneration or restoration operations if necessary.)**
- **Value the important role PNF landholders play within the Forestry Industry and offer long term security over management investment.**

- **Change government environmental legislation so that invasive riparian vines are classified as invasive native species in certain situations and can be removed through environmental works or by PNF landowners in ecologically sound ways.**
- **As we continuing our research into these issue; monitoring the cost effectiveness of continually cutting the vines back during biodiversity restoration and regeneration activities ensuring a future sustainable ecological forestry industry and sharing our knowledge gained with fellow landowners and industry groups. Funding support, rebates or tax concessions would be a positive encouragement to help make this necessary shift and balance out the current problem of economies of scale.**

I would welcome any discussions on the above mentioned points. I have attached a selection of photos as examples of the issues raised.

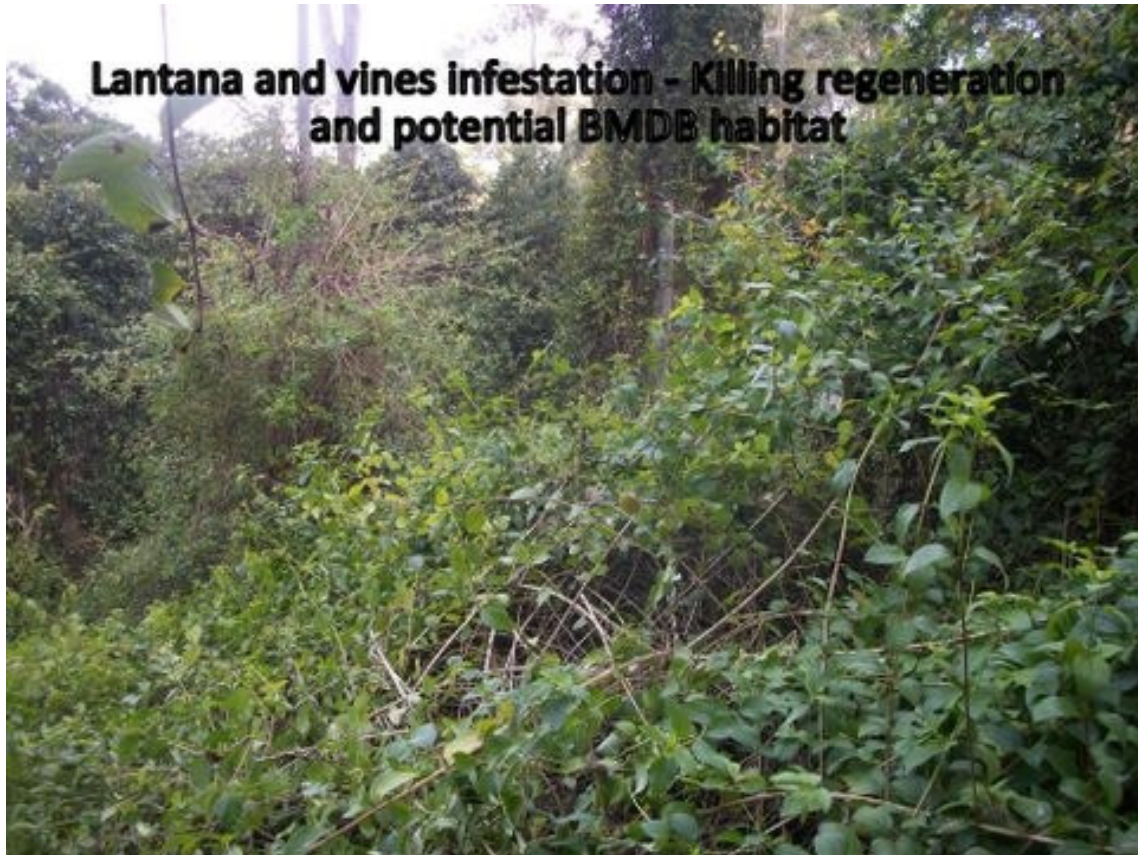
Thank you for taking the time to read this submission.

Kind Regards

Ian Leslight



**Vines completely covering regeneration
in riparian zones**



**Lantana and vines infestation - Killing regeneration
and potential BMD habitat**



Lantana and vines nearly to the ridge tops



**Side by side shots
1. How it should look**



**Side by side shot
2. Invasive vines - weed and native**



Natural regeneration on restoration site.