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Private Native Forestry
Submission on Draft Code of Practice for Northern NSW
Trevor Woolley

1. General

The document lacks any footers or headers. Each page requires a footer to identify the section or appendix to which it belongs. This will help navigation through the document.

2. Introduction

The draft code covers all of NSW north of Sydney except for river gum and western hardwood forests. This area covers a significantly wide range of bio regions, from coastal, mountain, tablelands and dry areas. With only a small number of exceptions, one method is used to permit, regulate and assess these diverse landscapes. This is totally unrealistic.

Understandably, the code is focused on the wet and large forests to the north, however, there are many areas (eg my property on Sandstone in the Upper Hunter) where the code is not relevant or useful. Examples are included in the comments below.

There needs to be a recognition in the code of the focus on large forests and the ability within the code to recognise those areas for which the code is not totally relevant.

3. Section 2.

The word “details” is used many times. Eg “Details of tree marking activities” etc. In the glossary, there is no definition of “details”. The following definition would be appropriate “contains sufficient information so that a competent person with suitable instruction can complete the task”

4. Section 2.1, 2.2 and 2.3

Both the Landholder AND contractors should be responsible and accountable for complying with the forest management and stewardship plans and for the reporting. Management of contractors in a forest is difficult because of distance and isolation. It is unfair and unrealistic for only landholders to be accountable for complying with the code.

Responsibility for compliance and reporting must be shared by the landholder and any contractors. In particular, contractors who have received proper instruction according to the code and then breach the code must be liable for prosecution.

5. Section 3.1

The addition of small scale harvesting to the code is supported.

6. Section 3.2

The code has a minimum basal area for all operations over all forest types and all climatic and geological areas. This is unrealistic. There are many even aged regrowth forests with thousands of stems/Ha where the forest cannot measure 10m²/Ha. This number may be applicable for the wetter and productive forests, however, on dry sandstone geology it is not appropriate.

In some areas, what were originally open grassy woodlands are now closed even aged regrowth forests. There are good ecological reasons to return these forests to a more open woodland habitat and this cannot be done with an absolute measure of 10m²/Ha

A better measure of forest health for thinning and forestry operations must be developed that is more appropriate to allow for operations in regrowth forests and those forests in drier areas.

7. Section 3.4

Regeneration cannot be prescribed to a two year limit. If there is a severe drought, then regeneration cannot occur. Particularly in dryer areas, regeneration will only occur in very wet years. In dry areas, it is unlikely that regeneration will occur within two years of forestry operations.

8. Section 3 General

There is nothing in section 3 which is relevant to the recent death of large numbers of trees caused by the drought and fire. Harvesting these trees is a no brainer, but there are special requirements for the removal of dead trees that would be required. For instance, damage to any associated forest would have to be minimised and many requirements surrounding the presence of threatened species would have to be modified to allow access to dead trees in areas that may otherwise not be allowed.

Similar comments apply to trees damaged by storms.

Additional sections should be added to section 3 to allow for the removal of dead trees after drought, fire and storm.

9. Section 6.1 Table B

It is not understood why rocky outcrops should prohibit forestry operations. Particularly on Sandstone, rocky outcrops (as per the glossary definition) are common and it is common for dense even aged regrowth to occur on these rocky outcrops. These areas would benefit from a thinning operation and there is little likelihood that a harvesting operation carried out with rubber tyred machines would damage the rocky ecosystem.

The absolute prohibition on operations in areas with rocky outcrops be removed OR the definition of rocky outcrops so that only those areas with sufficient rock to limit vegetation growth should be included in the areas where operations are prohibited.

10. Appendix A

Koala SEPP 44 – the exclusion of forestry operations, including thinning, from defined Core Koala habitat will effectively prevent any forestry operations in NSW. This is totally impractical and the forestry industry will end. The forestry industry, properly executed can be a sustainable industry and it should not be killed off by the Koala SEPP.

In particular, the maps associated with the Koala SEPP are demonstrably inaccurate. The Peppercorn trees next to my house are mapped as Koala Habitat!

The SEPP is still in draft form, and must be modified to allow forestry operations to continue.

I thank you for the opportunity to comment on the draft PNF codes

Trevor Woolley

Secretary Hunter Farm Forestry Network

