

**Name:** Darrell Green

**Postcode:** 2443

**About you:** Landholder

**Name of your business or organisation:**

**1. What improvements should the NSW Government consider making to the existing Private Native Forestry Codes of Practice?:**

The Codes of Practice should reward responsible PNF and provide for sanctions against operators who breach the Code.

**Please indicate which code/s you are referring to:** Northern NSW Code of Practice

**2. Do you have any suggestions to ensure the Private Native Forestry regulatory settings are efficient, enforceable and effective?:**

Land owners could be provided with simple land management and reporting tools, to easily record compliance for auditing. Local Land Management Awards that recognise and promote best practice operations and positive land management outcomes could be considered. Land Owners with PNF Approvals could be rated by Lands/ Forestry with a star rating for land management. The higher the star rating, the easier the license renewal should be. Can also consider a warning system where breaches are noted and with three strikes (or scale and severity of breach extent) could result in license being revoked. Industry Awards that recognise best practice operations and environmental outcomes could be considered. The Industry should also have the power to refer private operators with questionable practices back to Lands/ Forestry for review of the operating licences. This will eliminate rogue operators and land owners who through irresponsible practices could jeopardise the broader sector and image of the industry.

**3. How can the NSW Government improve the authorisation and approval system for Private Native Forestry?:**

The Government needs to ensure once approval is granted and individuals/landowners invest and make land management decisions based upon the approval, that the Government does not through another agency nullify that approval. Specifically, the NSW Government needs to ensure that when changes are made or proposed to other legislation or SEPP that affect PNF approvals, that the land owners are consulted and invited to comment prior to any changes. By way of example, the new Coastal Wetland SEPP has been applied by stealth without any consultation with us as private

land owners prior to gazettal and without any ground truths. It has had a negative effect on our PNF Operations, with conflict in advice from NSW Government Departments as to whether our current approval stands or is now in question. Specifically the EPA has in our opinion, outstepped their compliance and enforcement role and act more as a veto role to an already approved PNF, based on the new SEPP for which we were not consulted on and had no prior knowledge of, until after gazettal. We have invested considerable money in ensuring that our PNF operations are undertaken in accordance with silver cultural practices and are attentive to good environmental outcomes. The Coastal Wetland SEPP has placed all of our investments to date in serious question. It is unacceptable for the Government to act in this manner without consultation or compensation. It would appear that the NSW Government Departments are ideologically opposed to one another. Lands and Forestry recognise the important economic, social and environmental outcomes that can be achieved through selective periodic private native forestry as opposed to broad scale felling of a traditional forest. However, some Government Departments have a view to cease operations or make the approval process as costly, complicated and difficult as possible. In our specific case we have made responsible land management decisions to foster as much new growth as possible to ensure that our PNF Operations were to be viable into the future. The result has been that after good land management and revegetation principles, another State agency has seen fit to effectively back zone our land, applying Coastal Wetland SEPP over the majority of the property, and thereby now putting in jeopardy the very approval that has led us to allowing the revegetation to occur. If this practice is to continue, it would lead private land owners to question the benefit of facilitating revegetation processes for PNF, if another agency will then simply rezone the land (or apply a SEPP that has same effect) and halt the operations. This will have a long term negative impact to the environment, economy and could lead to unsustainable forestry practices in third world countries to meet the demand for timber. The NSW Government should be utilising this review to set an example for what can be achieved through a selective thinning regime every 5 to 10 years consistent with good silver cultural practice to promote biodiversity outcomes. It should promote local timber industries and products that can generate employment outcomes, local products to meet cost effective and environmentally friendly building products with Green Star Ratings. Failure to do so will lead to increase in cost for building materials and raw materials and will lead to imports of products not able to be verified as sustainably sourced. None of us want to see what has happened in Madagascar

through broad scale felling of forests play out in places like Borneo or the Amazon. The NSW should be utilising PNF to promote new habitat for our species such as Koalas, native birds, bats and marsupials. Selective Thinning consistent with good silvicultural practice can create new growth of native trees. The new growth and leaves for example are particularly important to our native species such as Koala. Selective thinning consistent with good silvicultural practice and subsequent regrowth is also an important fire management practice and can also help to address noxious weed management and thereby ensure native species can easily traverse the landscape. Done well, PNF practices can play the role that the traditional burning by our indigenous land managers undertook long before European occupation. PNF Operations should only be assessed and approved by Lands and Forestry. The appropriately qualified and skilled staff should make the assessment of suitability based on all known factors and once approved the license should stand, provided the operations are carried out in accordance with the approval. No other legislation, state agency or local government authority should be able to negate the approval and change the rules of engagement midstream. It is unethical to do so, and does not acknowledge the commitment of private land owners to the sector.

**4. What training and advice services would assist landholders, industry and the community?:**

Landowners – Advice of how to effectively manage several tiers of government approvals that often conflict with outcomes sought and requirements for approval and monitoring. A preferable outcome from this review would see this complex multifaceted approval regime change and landowners should only be required to deal with Forestry and the LLS. Industry – Industry could be linked to responsible PNF Operators and given examples of PNF Operators who have breached the Code and brought the industry into disrepute. Training on good outcomes that improve environmental outcomes whilst also harvesting in a responsible manner would be helpful. This will help the long term sustainability of the sector. Community - Good information easily accessible by the public on the environmental, social and economic benefits of PNF is imperative to ensure that a one sided anti forestry mantra does not prevail. Local Government/ Councils should be provided commercial in confidence information as to which properties have PNF approval and a contact at Lands/ Forestry should be provided to refer enquiries in relation to the PNF Operations the community may have in regard to any operations in their locality. This will ensure consistency of application across the State.

**5. Do you have any other comments or feedback relevant to Private Native Forestry that you would like to share with us?:**