

Private Forestry Service Queensland

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AUSTRALIAN FORESTRY STANDARD CERTIFIED

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Review of the Private Native Forestry Codes of Practice?

Please accept Private Forestry Service Queensland's response to the questions put forward by your review panel.

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

The Code, particularly the Northern NSW Code of Practice, is all but unworkable, especially in forests that have been high graded in the past, which is most of them. Specifically the Basal Area retention requirements have no basis in forest science. Retention standards should be based on forest health not an arbitrary figure that negatively impacts on productivity, environment and habitat values.

As a recent example after an extensive forest assessment of 1100ha property near Mt Marsh we found it impossible to implement best forest practice based on forest condition due to the Code not being based on good forest science. The assessment consisted of 20km of strip line, where every tree along a 10m wide strip is measured, its potential product, and product length, weather the tree was to be retained, harvested or treated out based on Crown health and developing defects etc. The results are presented in Table 1.

Table 1. Resource Summary Page

Landholder/Property:	Energy QLD-Mt Marsh	Unit Description:	Average Quality	Dud Rate:	30 %
Unit No. 1	Mixed				
PLOT DETAILS			UNIT DETAILS/ha		
Strip / plot area	105 590	m ²	Unit hectares	556 (500net)	ha
Original stems in plot	5308	st	Original sph	503	st
Residual stems in plot	1249	st	Residual sph	118	st
Habitat stems in plot	65	st	Habitat sph	6	st
Treated stems in plot	3680	st	Treated sph	349	st

Treated stems in plot <10cm	1813	st	Treated sph <10cm	172	st
Logged stems in plot	367	st	Logged sph	35	st
BA original in plot	225.375	m ²	Original BA / ha	21.34	m ²
BA total post logging	105.463	m ²	BA / ha total post logging	9.99	m ²
Original m3 in plot	498.737	m ³	Original m3/ha >10cm	47.23	m ³
Logged m3 in plot	265.027	m ³	Logged m3/ha	20.66	m ³
Residual m3 in plot	233.710	m ³	Residual m3/ha	22.13	m ³

What the data shows is a grossly over stocked forest at 503 stems/ha, that good forest science demonstrates should be around 130 stems/ha. Our in forest estimates and observations retained 124 stems/ha based on individual tree health and optimal stocking rates.

Table 2. Residual Stand Table Post Harvest and Treatment									
DBH	5 - 10	10 - 19	20 - 29	30 - 39	40 - 49	50 - 59	60 - 69	70+	Total
No	22	30	26	18	12	4	7	4	124

This forest was very heavily harvested 35 years ago and now requires a major reset to bring it back into a productive health and environmentally sound condition. The forest carried 21.4m² Basal area and could only be reduced to 16m². The existing Code limitation would effectively result in the forest being high graded once again with no provision for follow-up management, a totally perverse outcome.

A forest supporting 500+ stems/ha, is a forest in a poor environmental condition, the trees are under extreme stress, the habitat values for arboreal and ground dwelling mammals are severely compromised with little to no ground cover leaving such marsupials as Rufous Bettongs and Potaroos who depend on thick long grass. *The NSW OE&H describe the bettong's habitat requirement as - A dense cover of tall native grasses is the preferred shelter. They sleep during the day in cone-shaped nests constructed of grass in a shallow depression at the base of a tussock or fallen log. At night they feed on grasses, herbs, seeds, flowers, roots, tubers, fungi and occasionally insects.*

This is further exacerbated by the Bush Fire Environmental Assessment Code requiring a minimum eight year burning cycle. This dramatically increases fuel loading (double fuel load - quadruple fire intensity and doubles flame height) and shortens the window when good burning conditions prevail inevitably resulting in hotter fires, and regeneration of a dense acacia understory while aiding the proliferation of Lantana, eliminating grasses altogether.

Overstocked regrowth stands also limit crown growth severely diminishing the development of large crowns critical for the formation of large hollows for arboreal habitat. It also negatively impacts on the habitat values for most of the larger gliders that have the ability to glide large distances this does not occur in a grossly overstocked stand, indeed we rarely find the yellow bellied distinctive feed trees in overstocked forests.

It appears the Code was written by people who do not understand the basics of good forest management but also don't understand the negative impacts on environmental and habitat values that the standards outlined in the Code results in.

The section -

Code Variation

A landowner may seek development consent to undertake private native forestry (PNF) outside the provisions of the Code under the *Native Vegetation Act 2003* (NV Act).

A private native forestry Property Vegetation Plan (PVP) may modify in a specified manner the environmental prescriptions of the Code if an accredited officer is satisfied that:

- (1) The variation of the environmental prescriptions is minor
- (2) The proposed clearing will improve or maintain environmental outcomes
- (3) Strict adherence to the Code is in the particular case unreasonable and unnecessary

This concept requires further development and be applied in forests that, due to past management, now require a major reset to bring them back to a productive state. The plan needs to be prepared by a registered forester based on good quality forest assessment data.

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

Don't make them ambiguous and ensure the regulations have a basis in science not in a political agenda.

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

If good quality forest management plans are produced for a stand, say to an AFS standard or similar, than that plan should be able to be ticked off by a private suitably accredited organisation, similar to the requirements of Tasmania's Private Forestry Reserves.

Most of the decisions on tree selection in Private Native Forests are taken by the cutter, who usually has little understanding on good tree retentions standards; is there to make a living and finds it very difficult to walk past a good healthy tree that should be retained and cut the smaller suppressed tree beside it. This is the antithesis of optimising forest productivity where trees should be selected for retention based on:

- adequate growing space
- optimal log straightness and length
- have a vigorously growing crown
- are free of defect.

PFSQ believe an introduction of a cutter accreditation system would greatly improve this fundamental limiting factor in forest management, this would require them undertaking some level of training and attaining a competency in tree selection. The accredited cutter should be periodically audited and if in breach of the standard their accreditation removed.

Even where we harvest a block we always paint mark for retention this not only focuses on retaining healthy defect free trees at optimal stocking but ensures when the cutter when felling a tree, and the snigger when dragging it out protect the marked trees from any form of damage.

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

Landholders generally have a very low understanding of, and capacity in, good forest management and require training in all aspects of the infield application of the processors from general forest assessment, to understand the condition, species mix and requirements of their forests, right through to post harvest management and fire management. The training needs to be practical, hands on approach with the use of demonstration sites as much as possible, we generally try to include a visit to the local sawmill to look at the reality of the recovery rates from a variety of look qualities.

Good quality extension material needs to be aligned with the training program. A full suite of instructive YouTube videos on each topic would have great advantage.

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

While environmental attributes are important to forest health, these forests are privately owned and unless the public is willing to pay for these strict environmental restrictions than a lesser standard should be considered. Many of these standards are not based on science and are often perverse with severe negative impacts, particularly on Fauna.

The emphasis should be on forest health and the habitat and environmental benefits will flow. None of these restrictions apply to any other industry.

There must be a consideration on what is the alternative to the high quality, durable, and multifaceted hardwood product. Imported products from socially and environmentally destructive sources such as the Solomon's, New Guinea or Myanmar?

The restrictions imposed by the NSW Code reduces the available forest production area in Northern NSW to 400 000ha from a total of 2.9 million.

Signed



Sean Ryan

Executive Officer

Private Forestry Service Qld