

Submission on the Southern NSW Private Native Forestry Code of Practice

25th Jan 2019

Thankyou for the opportunity to comment

Through my forestry work as a planner and supervisor I have applied the code to private harvest operations in the South East of NSW for several years.

Operationally some aspects of the code are difficult to interpret so my focus would be to simplify those areas where it matters most for land owners and machinery operators to apply the code correctly.

Also I have concerns that the high BA (basal area) retention rates for single tree selection do not allow adequate regeneration for forest health and future harvesting. Compliance with both minimum stand BA and minimum regeneration and stocking under 3.3 of the code is not possible unless BA retention is reduced.

Recommendations

1. Ensure that mapped old growth can continue to be amended if the mapping is incorrect
2. Remove the Stand Height thresholds for basal area retention rates. The retained basal area limits should not have a stand height threshold because there is no beneficial connection between stand height and stem density for disturbance levels or biodiversity.
3. Reduce the minimum stand basal area for all forest types under single tree selection. This will allow adequate regeneration for forest health and future harvesting. The regeneration requirements under 3.3 can't be achieved under current BA minimums.

The table below shows stocking rates based on average diameter and minimum stand BA

	Single Tree Selection (multi-aged)				
	Minimum Stand BA				
	8	10	12	16	18
Avg DBHOB	Retained stems per hectare				
50	41	51	61	81	92
40	64	80	95	127	143
30	113	141	170	226	255
	Inadequate potential for regeneration				

From a viability point of view the typical ash/stringybark forests on the south coast are growing on poor soils with a pre-harvest basal area of approx 16 to 20m². Retaining a

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minimum retention of 12m² under the current code and removing only 4 to 8m² is not viable for a commercial harvest operation.

Thinning of regrowth is not viable in the small diameter class with high minimum BA. On the south coast a typical stand of ash/stringybark regrowth, aged 30 to 40years, will have an average removed dbhob of 20cm and retained dbhob of 25cm. Consideration of practical stocking levels and minimum BA is important to allow viable commercial thinning in the smaller diameter class.

	Thinning (regrowth)				
	Minimum Stand BA				
	8	10	12	16	18
Avg DBHOB	Retained stems per hectare				
50	41	51	61	81	92
40	64	80	95	127	143
30	113	141	170	226	255
20	255	318	382	509	573
	Not commercially viable				

4. 4.1 Table C. Rocky Outcrops
Give consideration to removing or reducing Rocky Outcrop protection. Under the new *Land Management (Native Vegetation) Code 2018*, rocky outcrops are not required to be protected when permanent clearing for pasture!! PNF is a lower disturbance activity and will regenerate to give a much greater biodiversity outcome compared to pasture
5. 4.2 (6) (b) Amend to allow dead standing trees to be counted as a hollow bearing trees providing they don't pose a risk to health or safety.
6. 4.4 Drainage feature protection under the current code covers mapped and unmapped drainage. It's quite common for mapped drainage features to be different to actual location or don't exist at all in the field. The code must allow for errors in drainage feature mapping for the correct outcomes.
7. 4.4 (2) (a) Remove this clause completely. It's difficult to understand and can't be interpreted operationally.

This review must focus on simplicity and practicality that produces a code that can be interpreted easily and results in positive outcomes for forest health and future viability within all forest types.

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