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About you: Government Organisation

Name of your business or organisation: Coffs Harbour City Council

1. What improvements should the NSW Government consider making to the existing Private Native Forestry Codes of Practice (Northern NSW, Southern NSW, River Red Gum Forests, and Cypress and Western Hardwood Forests)?:

Northern NSW - Greater protection should be given the protection of threatened species habitat. For example the requirements that a Koala feed tree will only be retained if 20 or more scats are found is too high a bench mark. Even highly used trees may not have this many scats - and land holders are unlikely to look for scats as it will decrease profits and many land holders are unaware that koalas may be using the forest.

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

- Invest in more resources for compliance - LLS should require fauna surveys prior to granting approvals. Reliance on existing records (i.e BioNet) is inappropriate given the level of impact and \$ generated. No other approval with this much potential for impacts to threatened species would be approved without adequate evidence.

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

- Maps of the PNF approved areas should be provided to Local Government along with the notifications to list the PNF approval on Planning Certificates. This will allow Councils to check dual consent issues, Koala Plan issues and also ensure that PNF approvals are not incorrectly carried across to any 'child' properties in subdivisions. - Use the most up to date vegetation mapping, sometimes this is LGA specific and not state or regional data sets that are less accurate

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

More publicly available information including maps regarding the areas approved for PNF. Greater compliance oversight. More training regarding recognising habitat.

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

As stated in the 2016 Regional State of the Environment Report for the North Coast Region of New South Wales, 'since 2007, private native forestry in the North Coast region has increased significantly. Of the 2,916 PNF agreements approved in NSW between 2007 and June 2015, 69.4% were in the reporting region, covering 49.7% of the total area under PNF agreements in

NSW (EPA Public Register 2016)'. The Regional State of the Environment Report 2016 goes on to say that 'the area under PNF agreements for the North Coast region as at June 2015 was 266,727 hectares' however the report also points out that only a fraction of these approvals have been enacted. Given that a PNF approval lasts for 15 years the impact and legacy of these approvals cannot be underestimated. Council notes that the independent review into the decline of koala populations, O'Kane (2016), refers to the Private Native Forestry Code of Practice several times throughout the report as being the appropriate regulatory tool for governing PNF in koala habitat. It has been the experience of Coffs Harbour City Council that the code fails to protect koala habitat as its interpretation is too limited, there is a failure to adhere to the prescriptions and there is limited resources for compliance. Analysis of Coffs Harbour City Council's records has revealed that of the almost 19,370 hectares of Koala Habitat in the Local Government Area, up to 23% are covered by PNF approvals. It is noted that Council does not receive mapping data to indicate how much of a property might be affected by a PNF approval and as such that this percentage might be somewhat magnified. However given the PNF approval usually covers the vegetated areas, and that these same areas are koala habitat, the figure is likely to still be representative. The 2016 Regional State of the Environment Report for the North Coast Region of New South Wales also noted that 'during consultation with councils in the reporting region in 2012, a number reported that they considered private native forestry to be the biggest threat to biodiversity'. With additional issues relating to PNF being raised in 2016 including, 'Approvals being issued on land designated as koala habitat' and 'Failure to adhere to the PNF Code of Practice'.