

Dear Sir/Madam,
pnf.info@lls.nsw.gov.au

14th February 2019
[REDACTED]

Re: Private Native Forestry Review
Submission by Catherine Macleod [REDACTED].

I am writing to you specifically regarding

- 1) the objects of the PNF
- 2) the Code of Practice of the PNF with special focus on logging adjacent to National Parks.
- 3) Management processes of the PNF.

1. Objects of the PNF should protect biodiversity values, and promote healthy soil and water quality. And that these objects be set by ecologists esteemed and respected in their fields.
2. Codes of Practice should reflect and underline the stated objects (see 1) as set by those esteemed ecologists. That these codes of practice should set in place procedures to map the presence of flora and fauna and recognise their importance to the biodiversity values of the property. Currently NSW Wild life Atlas is relied on to map the presence of certain species for the PNF. If no mapping has been done for the Wild life Atlas and no ecologist has been employed to do so then all species are not identified and their vulnerability or role in biodiversity on the property is not recognised and protected. Therefore assessments must be made by EPA ecologists who are recognised and respected in their field. Funding must be made available for those ecologists. Logging should not commence until reports by those ecologists are prepared and assessed.

No PNF operations should be carried out adjacent to National Parks and no PNFs should be granted where there is environmentally sensitive land. I would like specifically to refer to a property called [REDACTED] in [REDACTED] Road Nimbin immediately adjacent to the World Heritage Listed Nightcap National Park. Logging has been occurring sporadically on this property since the 1990s. In 2010 the Department of Environment and Climate Change and Water was notified that numerous alleged breaches of the PNF/PVP had occurred on the property as a result of logging. It should be mentioned that this property has rainforest, steep slopes (sometimes in excess of 35 degrees and highly erodible soils. The issues raised involved logging in rainforest areas, logging in exclusion zones, inadequate roading and infrastructure. A number of these breaches were upheld by the Department but no punitive measures were undertaken. Reporting of the breaches was undertaken by a private individual. There were no sightings reported in the NSW Wildlife Atlas and no ecologists reports were believed to have been undertaken. World Heritage listed National Parks are considered to be of "outstanding universal values". These values would obviously be compromised if logging on adjacent properties was allowed.

3. I think that proposed deregulation and self assessment for PNFs should in no way be mandated and that responsibility for approval and advisory services be held by the Department of Environment, Climate Change and Water and that the EPA be responsible for compliance and enforcement. Ongoing Monitoring of NFP operations and approval and advisory services of PNF plans should be undertaken by the Minister of the Environment and not by LLS because

conflicts of interest may arise due to the demands of the logging industry. Penalties for non compliance should be increased and enforced. Extra remuneration should be made available to the department for this extra responsibility.

4. Finally, I believe that all approved PNF plans should go into a public register available online and listed under easily referenced Lot and DP numbers.

Yours faithfully,

Catherine Macleod.