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## Submission on Draft PNF Codes of Practice, May 2020

The guidelines as proposed are yet another watering down of environmental regulation of logging on Private Land.

### **Lack of accountability and transparency**

This is accompanied by diminishing accountability and transparency. At least under the Labor Governments there was some public register of PNF approvals, which enabled those interested to get a broad perspective on the areas being approved for logging. It never provided details on individual properties, but it did give the region and the hectares approved. Given that most PNF involves the degradation of threatened species habitat, it is appalling that in 2020 there is no public transparency. **The public register should be reinstated and maintained on at least a monthly basis.**

There has been decades of logging with little oversight and absolutely no assessment of impact on threatened species specifically and all flora and fauna in general. The Comprehensive Regional Assessments in the 1990s seldom included data from private land. The logging industry organisation, the Forest Products Association, urged landholders to deny access to the NPWS survey teams. Their logic was that “if they find something on your land you won't be able to log it”. Hence the scarcity of records for private land. Nonetheless, private land benefits from the Regional Forest Agreement process and the exemption from the Commonwealth Environment Protection and Biodiversity Conservation Act, on the erroneous assumption that environmental assessment has already occurred. The reports that did purport to assess the conservation status of private land were often 'desktop analyses', with little input from contemporary field-work.

If this exemption from the EPBC were not in place, logging approvals would be required to go through the planning process. They would probably need a development application, perhaps more aptly named a destruction application, where the environmental impact of the work would need to be assessed. Not just the impact on flora and fauna and threatened species but also on the catchment and the social impact of dozens of loaded log trucks using narrow roads and causing stress to both local infrastructure and other road users.

The contribution of conservation values on private land was taken to contribute under the Comprehensive, Adequate and Representative (CAR) Reserve system, as providing habitat for threatened species and to allow connectivity between reserves. This assumed sympathetic land management. There were to be significant funds for incentives for wildlife corridors across the landscape. Again, this has not occurred. Most funding has been directed towards assisting landholders to log. An entire unit of the EPA was dedicated to this task, including the re-mapping of areas of oldgrowth and rainforest in order to 'disappear' them, thus enabling logging to occur. This has been the approach for the last 20 years.

As I have said in every submission process on this issue for the last 25 years, **there must be surveys for threatened species conducted prior to logging and areas that are clearly important habitat must be excluded from logging approvals.**

The continuing head-in-sand approach of – we haven't looked and haven't found anything, so there's nothing there of conservation value - is absurd, and worthy of a banana republic, but surely Australia and our unique flora and fauna deserve better in 2020. After all with more than 1000 species and ecological communities on the threatened species list in NSW, are government decisions going to continue to push them to the brink?!

The key to good planning and environmental assessment has been good data and in the case of ecological values such as oldgrowth, rainforest, threatened ecological communities etc, this requires good mapping. If there are to be exclusion zones based on **these ecological values and others such as wetlands, heathlands, rocky outcrops and streamside buffers, then these must be mapped** and the process needs to be credible, not undertaken by those with vested interests to 'disappear' areas that would

otherwise be excluded from logging.

Streamside protection strips are often the only value that is excluded from logging as these are permanent and not the victim of subjective mapping decisions. An early draft PNF Code proposed increasing buffers for increasing stream order- 10m for 1<sup>st</sup> order, 20m for 2<sup>nd</sup> order, 30m for 3<sup>rd</sup> order, etc. Since then, the width of streamside protection strips has been arbitrarily reduced to 10m, 5m and in some places 0m. This has led to not just increased bank erosion and downstream sedimentation and siltation of creeks and rivers, but it also minimises the flimsy network of wildlife corridor across the landscape and allows the logging of the few remaining older trees along streams.. The streamside protection areas and counted as wildlife habitat but often the terrain is so steep that only rock wallabies can make use of it. **Streamside logging exclusions must be a minimum of 20m on all stream orders.**

**Logging should be excluded from steep slopes.** Prior to the advent of the Native Vegetation Conservation Act 1996, logging on slopes greater than 18 degrees required assessment and approval. This was because it was long recognised that the damage done by the subsequent erosion and stream pollution was significant. Since then however, the logging industry has successfully lobbied for logging to be allowed on slopes up to 30 degrees. In the field that is so steep it is almost impossible to traverse. Logging should not be allowed on slopes greater than 20 degrees.

As a rule of thumb, eucalypt trees put on about a centimetre of girth a year. A 30cm diameter tree at breast height (DBH) is likely to be around 30 years old. It takes between 80-200 years for trees to form hollows that are suitable for the hundreds of species that have particular needs for tree hollows for sheltering and breeding. Tree hollows are an absolutely critical resource across the landscape, and their removal is listed as a Key Threatening Process. To this end a precautionary approach needs to be taken that recognises the many year it takes for these hollows to form. **All trees greater than 80cm DBH must be retained.** By having a clear size restriction, there can be no ambiguity about whether the tree has hollows, or is suitable for forming hollows over the next several decades.

**Trees that are to be maintained for nectar, should be mature and have healthy crowns.** As someone who has looked at numerous post-logging sites, it is fair to say that retained trees are usually small, stunted and often damaged, with poor crown development. If there is to be a genuine effort to retain trees for wildlife, then it needs to be stipulated that those trees must have healthy crowns. All retained trees need a buffer of at least one tree height. The bulldozing of logging debris around retained trees so they are damaged in post-logging burns should be the subject of serious penalties. Again, this is common practice on public lands.

**As with public land, the new code allows for an intensification of logging, this is madness.** There has been no silvicultural evidence provided that this greater intensification will improve the values of the forest. In many cases it will not, if what is occurring on public land is any indication. The intensification will allow for significant weed invasion, a change in ecological communities to drier sclerophyll, making bushfire more likely and more likely to burn at a higher intensity. It will further dry out the catchment, with younger forest regrowth sucking up more water and thus there will be less water for downstream users. In a drying climate, Local Land Services should be about prioritising land management actions that will lead to more water over time. Intensive logging will lead to less. It is breach of duty of care to be pursuing this approach.

Behind the push for intensification is not any silvicultural benefit, it is the spurious promotion of wood as a biofuel. This was explicitly promoted in the 2017 DPI report that suggested the north coast of NSW could supply 1 million tonnes of wood a year from combined sources (about 400,000 tonnes was from private land) to feed wood-fired power stations. This would then be counted as 'renewable' energy. While the combustion of annual crops as biomass can probably be counted as not creating additional carbon pollution, the combustion of wood coming from trees decades old can not. This has now been clearly recognised by scientists around the world. [ [http://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures\\_Scientist-Letter-on-EU-Forest-Biomass.pdf](http://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letter-on-EU-Forest-Biomass.pdf)] **Burning wood from trees is not renewable**

**on the required timescale to address climate change** - there is no guarantee that similar forests will regrow given the likely increase in daily temperatures and drop in rainfall. It is not clean-burning, wood actually produces more CO<sub>2</sub> per unit of energy produced than burning coal. The CO<sub>2</sub> will remain in the atmosphere for decades, before growing forests might remove it. We don't have that kind of time and should be promoting genuinely clean and renewable energies. This push for burning wood is the latest scam by the logging industry with no consideration for future generations or life on our planet.

While governments across the country claim they don't practice clearfelling, this is disingenuous. **Leaving the odd tree here and there scattered across a bare landscape is still clearfelling.** Under the previous code Australian Group Selection, which cleared patches of a hectare or so, was unacceptable, because it was recognised that having cleared areas across the landscape was not good forest management, and yet now an intensification of logging is being proposed that will be much more damaging than AGS.

**The proposal that the LLS will prepare Logging Stewardship Plans is offensive.** Once again we have public resources being used to facilitate land degradation. Calling them 'stewardship' plans is an abuse of the term, and I suggest an attempt to give the illusion of certification comparable to that of the Forest Stewardship Council. If you can't meet the standard, just come up with a name that suggests you have. It is the height of hypocrisy.

Under the proposed Code, everything seems to have the status of guidelines. The landholder can change almost every aspect of the plan. This means that there is no way that any form of external monitoring or regulation can take place, because the landholder will claim they amended their plan.

**Koalas lose out again.** There is no requirement to survey for koalas prior to logging. Most landholders would not be able to identify a koala scat, the most reliable form of koala ID. So the prescription for leaving 15 Koala feed trees in the logging area if Koalas are known from the area will be seldom triggered. As for the other threatened species, no look, no find, no leave trees. Just as the previous requirement for SEPP 44 Koala High Use Areas to be off-limits to logging was meaningless because most LGAs failed to implement Koala Plans of Management, this prescription will have the same effect. The ongoing loss of koalas across the landscape leading to their eventual demise... extinction, from areas where they were once abundant. On our watch. On your watch.

**In summary, the PNF Code will see ongoing degradation of private forest lands. There will be a loss of carbon, a decline in water yields downstream, an increase in forest flammability, a decline in biodiversity and the chance of similar timber yields being obtained any time in the future will be slim.**

By not promoting incentives for forest repair and restoration, a major opportunity to address a variety of environmental problems has been lost. If forests were managed to promote their oldness, and the focus was on light, selective logging of smaller trees using lower impact technologies, we would have more jobs, more wildlife, more water, more carbon storage and safer forests. Once again governments have chosen to make things worse.

In 2020 who is surprised? As we collectively hurtle towards planetary ecological catastrophe. Oh yes, we depend on a healthy ecology. Too bad the decision makers haven't yet learnt that lesson.