

Name	catherine macleod
Business (if applicable)	
Email address or preferred method of contact	
Postcode	2480
Do you want your submission marked as confidential? *	No
Do you want to receive future notifications and updates on the PNF Review? *	Yes
Which of the following best describes you? *	Landholder
Which draft PNF Code are you providing a submission on? *	Northern NSW
Attach your submission	 <a href="#">submission_proposed_pnf_plan_2020.docx</a> 17.88 KB · DOCX

Submission Proposed PNF Plan 2020

Catherine Macleod [REDACTED]

18/05/2020

Dear Sir/ Madam,

Vegetation clearing is the single greatest cause of environmental degradation. It is a major contributory factor in climate change, soil erosion, loss of flora and fauna species, bushfire frequency and intensity and of course biodiversity loss. Not to forget water quality as well. None of this is contestable any more. Justin Fields MP said in response to the release of the "Cabinet in Confidence" report by the National Resources Commission compiled in July 2019 that "All new clearing approvals should be paused until the government can put on the table real reforms to ensure this massive biodiversity loss cannot continue." Well, the proposed new PNF plan most certainly does not do that.

PNF operations need to be strictly regulated and inspected at every stage and compliance must be enforced. There needs to be exhaustive guidelines and infringements must be met with fines sufficient to act as a disincentive. Species listings need to be undertaken by independent ecologists and must be mandatory. Ideally a DA (Development Application) would need to be tendered for each proposal. That way the local community would be empowered to tender submissions regarding the proposals and their impacts including effects of logging trucks on local roads and safety of residents.

The proposed PNF Plan 2020 falls far short of these prescriptions and instead is nothing short of a rubber stamp for allowing unsuitable applications to be approved. One would suggest partisan politics plays a role in this because reason does not.

Even the objectives of this new PNF Plan are at variance with the Code. And I quote from the objects listed in the INTRODUCTION

"a) To authorize the carrying out of the PNF in accordance with the principles of ecologically sustainable forest management" and

" b) To protect biodiversity and water quality (including threatened species , populations and ecological communities.)"

Moreover SECTION 2 OF THE CODE states under Forestry Operation Planning and Management that "A Forestry Operation Plan must include ii) recorded locations of any threatened species populations or threatened communities listed under the Listed Species Ecological Prescriptions set out in Appendix A"

How can these objectives (to do with biodiversity protection and ecologically sustainable forest management ) be met if only prior recorded threatened species populations are to be listed IF THEY EXIST? Most private landholders do not have listings in the NSW Wildlife Atlas recorded. And therefore how can biodiversity be maintained if there is no mandatory listing of species. The

Attorney General said in 2019 that Local Land Services (the body proposed to manage these PNF Plans ) does not have the expertise to identify threatened ecological communities. How can these communities be protected if they are not mapped? Moreover, according to SECTION 2.1 Forestry Operation Plan “Any research or forest monitoring activities can only occur with the written consent of the landholder”. So how can there be any degree of confidence that landholders are to always act in the interests of the environment and not to their own financial benefit if there cannot be any outside monitoring?

I have had direct experience of the shortcomings of the previous PNF plans living as I do next to a [REDACTED] acre property (Lot [REDACTED] DP [REDACTED]) that immediately adjoins the World Heritage Listed Nightcap National Park. This [REDACTED] acre property has been logged extensively over the years, the last 20 years mainly targeting tallowood, flooded gum and brushbox. The forest type of the adjoining Nightcap National Park is classified as Lowland, Subtropical Rainforest for an area of 525 hectares. The Nightcap National Park with World Heritage Values is an oasis of endangered species with high biodiversity values currently threatened by fire, climate change and inroads of feral species – weeds etc.

In 2010 numerous breaches of the PNF and NVA (Native Vegetation Act) on this property were reported to the Department of Environment Climate Change and Water. These breaches included roading, logging in riparian exclusion zones, logging on slopes in excess of 35 degrees, logging of old growth trees in excess of 2.0 metres and lack of retention of habitat and recruitment trees. The complaint led to 1 (one) fine of \$1000 for the felling of a 500 year old brushbox tree and a direction for the owner to remediate a “roading” breach. This was completed in a reportedly “desultory manner”. The actions taken by DECCW do not in any way succeed in discouraging any further breaches of the act since they provide no financial disincentive.

Logging was carried out within 70 metres of the ancient Gondwanaland remnant rainforest (Nightcap National Park.) There was never any species listing undertaken for this [REDACTED] acre property and nothing appeared in the NSW Wildlife Atlas. However, within 2 kms of this property was listed these species:-

Alberts Lyrebird, Masked Owl, Loveridges Frog, White Eared Monarch, Wompoo Fruit Dove, Olive Whistler, Pouched Frog, Davidsons Plum, Corokia Witeana.

They may well have been part of the ecosystem on the land in question so the destruction of them or their habitat could conceivably have taken place. We will never know.

The EPBC Act which supposedly coordinates the actions of State and federal environmental offices has committed itself to the protection of international environmental agreements such as World Heritage Listed national parks eg the Nightcap. The proposed PNF Plan seems to have made no such allowance therefore it is itself in breach of the EPBC Act.

I would also like to add that 1) logging on slopes in excess of 25 degrees not be allowed

2) any tree over 80cm in diameter be left

3) no clear felling should be allowed

4)there should be follow up inspections by LLS for regeneration work and weed removal

5)nectar feed trees to be retained need to be large and healthy.

6) an exclusion zone of 20 metres around all streams whether mapped ore not.

Yours faithfully,

Catherine S Macleod.