

Draft PNF Codes of Practice Submission Form

**To make an online submission online go to www.lls.nsw.gov.au/pnforestry and follow the links*

The NSW Government is providing all members of the community the opportunity to comment on draft Private Native Forestry Codes of Practice as part of the Private Native Forestry Review (PNF Review). The PNF Review seeks to balance the sustainable development of the private native timber and agricultural industries while recognising the environmental values of the private forest estate. We're inviting your comments on the draft Private Native Forestry Codes of Practice for Northern NSW, Southern NSW, River Red Gum Forest and Cypress & Western Hardwood Forests.

The draft Private Native Forestry Codes of Practice can be viewed on the Local Land Services website at www.lls.nsw.gov.au/pnforestry

Submissions close 19 May 2020. All submissions will be published unless marked confidential.

The following questions are a guide to assist with your submission.

Name: TODD GELLETT

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1. Do you want your submission marked as confidential?

Yes

No

2. Do you want to receive future notifications and updates on the PNF Review?

Yes

No

3. Which of the following best describes you?

PNF Industry

Timber Industry

Landholder

Individual

Other (please specify):

Agricultural Industry

Environmental organisation

Local Government

4. Which draft PNF Code are you providing a submission on?

All Codes

Northern NSW

Southern NSW

River Red Gum Forest

Cypress and Western Hardwood Forests

5. Feedback on draft Codes

Please provide your feedback and comments on the draft PNF Codes of Practice in an attachment. Where possible, please refer to the relevant section of the draft PNF Codes (e.g. Section 1 - PNF Plans; Section 2 - Forest operation planning and management).

Lodge your submission by:

Email to pnf.info@lls.nsw.gov.au or Post to Private Native Forestry Review, Locked Bag 6013 ORANGE NSW 2800

For more information, visit our website at www.lls.nsw.gov.au/pnforestry or contact us on 1300 795 299.

Information from this survey is collected for the purpose of the Private Native Forestry Review. The supply of this information is voluntary. Information will be stored and managed in accordance with provisions under the Privacy and Personal Information Protection Act 1998. It will not be used for any other purpose and will not be given to any other third party except where required by law. You may access or correct your personal information by contacting pnf.info@lls.nsw.gov.au.

Re: Draft PNF Codes of Practice Submission – River Redgum

Introduction

- It is important that the Draft Code makes clear the operational activities that are and are not covered.

Private Native Forestry Plans

- The Codes should specify the period that will apply to Private Native Forestry Plans (PNF Plans).
- A mechanism should be included in the Codes that enable the term of a PNF Plan to be extended.
- The period for which a PNF Plan is issued should be varied depending on the type of Plan that is chosen. A Forest Operations Plan should be a maximum of fifteen years while the maximum term for a Forest Stewardship Plan should be 50 years.
- We are pleased that Local Land Services will provide all relevant digital information when issuing a PNF Plan.
- There should be no need for relevant digital information to be resupplied just before an operation commences. This will be disruptive and may delay the start of an operation.

Forest Operations Plans and Forest Stewardship Plans

- The difference between a Forest Operations Plan and a Forest Stewardship Plan needs to be made clearer.
- Local Land Services should approve all proposed minor variations Plans. It is not necessary to involve the EPA or ministers.

Reporting

- Sixty (60) days rather than 21 days is considered more reasonable and appropriate for reporting to LLS at the completion of operations.
- Reporting of actual volumes harvested should be by product. This will allow the economic value of the industry to be determined.

Silvicultural operations

Small scale harvesting

- The provision for small-scale harvesting is supported.
- A minimum basal area of 10m²/hectare should apply consistent with the Northern Region Code

Single tree selection and thinning

- It is unnecessary that a Forest Stewardship Plan require the approval of both the LLS and the EPA. Approval by LLS is adequate.
- A minimum basal area of 10m²/hectare across the harvested area is supported although it may need to be lower in special cases.
- The minimum basal area in the River Redgum Code should be amended to align with Northern Region Code (i.e. changed from 12m²/hectare to 10m²/hectare).
- Single tree selection (STS) and thinning are different forms of harvesting. Therefore, they should be treated differently. For example, there should be no requirement for regeneration in areas that have been thinned.

Australian Group Selection

- The maximum gap size for AGS is too small. Unless canopy openings can be up to three times the stand height, there is little point in undertaking AGS.

Regeneration

- The reference to 'elsewhere in the forest' needs to be defined.
- It is important that the method for measuring forest regeneration is workable and a reliable indicator.
- Regeneration targets should not apply to thinned forest as that is not the purpose of thinning. CI3.4 (3) should not apply to areas which have been thinned.
- The period specified in CI3.4(5) should be 36 months (not 24 months which is inconsistent with CI 3.4(1)).
- In CI3.4(5) the process for addressing areas that do not properly regenerate should be specified by a qualified forester, not the EPA who have no expertise.

Pest and weed management

- The draft Code does not properly address the management of pests and weeds. LLS should actively assist landholders to manage pests and weeds.

Fire management

- River Red Gum is sensitive to hot fire. The draft Code should include special provisions which help protect River Red Gum from damaging fire.
- LLS should be actively promoting the use of prescribed fire to achieve fuel management objectives.

Protection of landscape features of environmental and cultural significance

- The Protocol which applies to the re-evaluation of old growth forest is biased and should be the subject of an independent review.

Protection of habitat and biodiversity

- Hollow-bearing trees do not need to have a spreading crown

- The best recruitment trees are unlikely to be 'vigorous' as growth slows as trees begin to develop hollows.
- Hollow dead trees should be counted as hollow-bearing trees as is proposed in the Northern and Southern Codes?
- The requirement to retain additional recruitment trees where there are less than the specified number of hollow bearing trees present is unreasonable.
- If LLS wants to increase the number of hollow-bearing trees it should provide financial incentives to landholders to do so.

Minimising damage to retained trees and native vegetation

- Trying to protect all *Allocasuarina* and *Banksia* species is impractical and unnecessary.
- *Acacias* and are pioneering species which arise from disturbance. *Acacias* do not need to be protected from disturbance.
- *Exocarpos strictus* (dwarf cherry) is a parasite and a sign of forest under stress. *Exocarpos strictus* does not warrant special protection.
- *Eucalyptus microcarpa* (grey box) does not warrant special protection within River Redgum forest.
- Landholders should be encouraged to protect timber values by avoiding damage to regrowth and retaining 'growers'.

Drainage feature protection

- No comment

Construction and maintenance of roads

- No comment

Log landings, portable mill sites and snig tracks

- No comment

Appendix A: Listed species ecological prescriptions

- The quality of BioNet records and how they will be used by LLS is not clear and of concern.
- Records that are more than ten years old are not reliable should be ignored.
- Records that pre-date a major wildfire are also unreliable and should be ignored.
- The current Codes exclude records in adjoining public lands, due to adequate protection being already provided. A similar requirement needs to be included in the new Codes.
- There is no scientific evidence supporting the need for koala browse trees to be a minimum of 30 centimetres diameter at breast height over bark.

Yours sincerely



TODD GELLETY