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| 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? *                                 | Timber Industry   |
| Which draft PNF Code are you providing a submission on? *                    | All Codes   |
| Attach your submission   | <input type="text"/><br><a href="#">key points on pnf draft codes northern and southern.docx</a><br>41.20 KB · DOCX |

Monday, 18 May 2020

Private Native Forestry Review  
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## **Re: Draft PNF Codes of Practice Submission – Northern & Southern**

### **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 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 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

### **Silvicultural operations**

#### **Small scale harvesting**

- The provision for small-scale harvesting is supported.
- A minimum basal area of 10m<sup>2</sup>/hectare should apply to both the Northern and Southern Codes

## **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 10m<sup>2</sup>/hectare across the harvested area is supported although it may need to be lower in special cases.
- The minimum basal area in the Southern Region Code should be amended to align with Northern Region Code (i.e. changed from 12m<sup>2</sup>/hectare to 10m<sup>2</sup>/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**

- More than 24 months is needed to achieve minimum stand stocking levels. It is proposed that at least 36 months be allowed to cater for seasonal variations.
- In Table A it is not clear what 'elsewhere in the forest' means.
- It is especially important that the method for measuring forest regeneration is workable and a reliable indicator.
- We do not think that the NSW EPA is qualified to provide advice on remedial action in areas where regeneration targets are not achieved. It would be better to rely upon the technical advice of a qualified forester.
- How will forests that do not meet the minimum stocking requirements before harvesting commences be treated? LLS should help with rehabilitating these areas.

## **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**

- The draft Code should include special provisions for using and managing fire.
- LLS should be actively promoting the use of prescribed fire to achieve silvicultural and fuel management objectives.

## **Protection of landscape features of environmental and cultural significance**

- The Protocols which apply to the re-evaluation of old growth forest and rainforest are biased. These Protocols need an independent review.

## **Protection of habitat and biodiversity**

- The draft Code is too prescriptive about what constitutes a hollow-bearing tree.
- It is not appropriate to list species as feed trees, as all eucalypts have feed value when they flower.
- The number of dead standing trees that may contribute to the total hollow bearing tree count should be increased (beyond 2).

- The requirement to retain additional recruitment trees where there are less than 10 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 highly impractical and unnecessary.
- Landholders should be encouraged to protect timber values by minimising damage to regrowth and future growers.

### **Drainage feature protection**

- The way the term 'stream' is used is a misnomer.
- The note that allows additional measures to be implemented should be deleted. It is unfair to allow additional rules to be imposed following a site inspection as it is regarded as a sovereign risk.

### **Construction and maintenance of roads**

- No comment

### **Log landings, portable mill sites and snig tracks**

- On State forest harvesting is permitted on 30-degree slopes. It is appropriate to have the same slope limit for PNF.

### **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 and 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



Andrew Epthorp

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