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Private Native Forestry Review  
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**Submission re Local Land Services: Private Native Forestry (PNF) Review 2018**

I would ask that the following recommendations be considered under the PNF review.

The current practice of landholders lodging a map of their lands where native forest logging is to be undertaken is inadequate. Most private lands have never been surveyed, and any threatened species locations will subsequently not appear on any NSW Wildlife Atlas or Bionet records. Therefore independent ecological and Aboriginal cultural heritage surveys **MUST** be performed **PRIOR** to approvals.

The expectation that somehow these landholders (in some circumstances absentee property holders and commercial firewood merchants) will then inform later if they find threatened fauna or flora (which may flower seasonally and infrequently) or endangered forest communities, can only encourage a 'don't look, don't find' approach to conservation. It also assumes they have the ability to identify these values.

Reliance on aerial mapping for vegetation identification, is totally inadequate. Such mapping is rough, broad scale and often proven to be inaccurate at the property level. It is therefore absolutely essential for vegetation to be mapped 'on the ground' to ensure correct identification.

The department's claim that not many people make requests to log Endangered Ecological Communities (EEC's) is ludicrous, and certainly could be construed as deceitful. How would they know when they haven't been identified as EEC's in the first place?!

We may never know just how many under represented and endangered vegetation communities have actually been logged, how many threatened species homes have been felled, and how many rare plants have disappeared under bulldozer blades and forestry machinery using these approvals. At the moment, under the NSW Environment Minister's Codes, if it's not recorded then it simply wasn't there! This is making a mockery of everything the Department is supposed to represent.

A prime example that demonstrates many of the faults in the Private Native Forestry Code of Practice is that of Mount Rae Forest on the NSW Southern Tablelands in the Upper Lachlan Shire. I reside in the Upper Lachlan Shire and have followed the progress of this case with great interest, and also visited the site on many occasions.

Office of Environment & Heritage (OEH) ecologists opposed former plans by a full-time firewood merchant to log his lands in Mount Rae Forest, and also those of neighbours who agreed to participate. Departmental scientists wrote: " The Department of Environment & Climate Change (DECC) objects to the proposal on four major grounds, these being;

- Impact on threatened species;
- Impact on significant vegetation;
- Inadequate consideration of Aboriginal cultural heritage;
- Lack of supporting documentation;
- Inadequate consideration of the ecological sustainability of the proposed operations."

DECC was informed of the presence of the NSW endangered native orchid - the *Diuris aequalis* (Buttercup Doubletail ) on these lands.

The local council opposed the felling of any more trees for commercial purposes in this forest as a result. However, when the PNF Interim Act came out, the now OEH approved the same operations. The PNF approval process took only a few weeks to approve what had previously been opposed by the department for years, and without any of the following taking place:

- No checking with the trained ecologists of their own department who had visited this forest on many occasions. Prior to PNF these government scientists even held field days in this forest to inform of the above values.
- No checking of this forest's role in local landcare applications to plant trees and shrubs linking wildlife corridors and shelter belts to this important remnant forest.
- No checking with local catchment management authorities or local council.
- No checking with departmental scientists conducting surveys on adjacent lands for conservation agreements .
- No consideration for the threatened species known on the properties approved for logging - such as the NSW endangered *D.aequalis*.

Despite being informed that the code has an "extensive list of prescriptions for threatened species, no individual protections were listed for *D.aequalis* under PNF. I believe it took a member of the public over year of lobbying until a prescription appeared for this species. I am reliably informed that no explanation was ever given as to why it was added, or why it was omitted in the first place.

In a further irony the property adjacent to the PNF firewood clearing in Mount Rae Forest (performed in the past with a bulldozer!) is now a "managed site" for this rare orchid, yet the same habitat next door is being logged!

I would add that Mount Rae Forest has been the focus of countless hours of plantings over a number of years by a local landcare group (Roslyn Landcare) to create corridors linking to this local forest remnant. Landcare and government field days have been held within the forest. Then the government basically says - if you are a landholder just log trees here for 'resale firewood'! Will Local Land Services, who employ Landcare Facilitators and run such field days, continue this approach to conservation or use their local knowledge to actually conserve?

I am also told that there is currently no protection for the NSW vulnerable species the Gang-gang cockatoo under OEH's PNF codes, while even the NSW Forestry Corporation operations do provide one! Why does the NSW Environment Minister (and now Local Land Services) continue to ignore this threatened species? I would ask that this hollow dependent species be likewise added to the list of individual species protections under the PNF Code of Practice.

Currently PNF does not regulate the end product, concerning itself only with "environmental outcomes." I would ask the department how commercial firewood from threatened species habitat, sold in towns and cities, does not negatively impact the environment? Carbon isn't stored long in firewood, it's burning in cities can only add to particle pollution, respiratory conditions and carbon emissions.

Firewood bags and truck loads of firewood are being sold as "bio certified by Local Land Services and the NSW Environment Minister"! If this review is genuine then changes must be made to ensure this never happens again.

It is my hope that such changes to the current Code of Practice will result in a more balanced approach between economic outcomes and environmental protection.

I thank you for the opportunity to make this submission, and look forward to your favourable consideration of these comments.

Yours sincerely,

**KAY MUDDIMAN**

*"The planet can survive without human life but it cannot survive without animal life. The animals are the keepers of the earth - they pollinate it, fertilise it, prune it, aerate it and keep the earth healthy. They are life itself. Without them we are the endangered species, and remember - every time a species dies, we are ourselves one step closer to extinction".*

(Denise Garrett & Kim Dale)