

Private Native Forestry REview

1 message

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Ecologically Sustainable Forest Management is essential.

It is very appropriate to specify the Objects of Private Native Forestry, especially since this recognises that sustainability is about ecosystem services rather than a land use. This means the most appropriate Minister to be responsible for the legislation and its implementation is the Minister for the Environment.

Part 5B of the Local Land Services Act 2013 specifies and defines ecologically sustainable forest management (ESFM) for Private Native Forestry (PNF). ESFM must also include however the explicit recognition of the role of forests in the global carbon cycle, this is presumably what is intended by "*(v) the contribution of native forests to global geochemical cycles*"; Part 5B objects also must include protection of the soil resources. Now, at last, there may be a chance to make land management decisions that take in to account the consequences of those decisions.

To achieve ESFM it is obvious that the Codes of Practice must be consistent with the objects. And that Plans must be only approved if they are consistent with the Objects. The Draft Codes of Practice need to be peer reviewed by independent experts. It is imperative that the codes have provisions to protect water and soil and habitats that are clear and understandable. We can have no loopholes.

60ZZA Offence of contravening requirements of plan or code of practice

(1) A person who contravenes a requirement imposed by a private native forestry plan or by an applicable private native forestry code of practice is guilty of an offence.

... Note : Section 122 (2) of the Protection of the Environment Operations Act 1997 provides a defence to the offence of polluting waters under that Act if the act was the carrying out of a forestry operation authorised by a private native forestry plan and was carried out in accordance with that plan and the applicable private native forestry code of practice. A similar defence applies to an offence relating to the protection of animals and plants under Part 2 of the Biodiversity Conservation Act 2016 (section 2.8 (1) (h)) and of fish under Part 7A of the Fisheries Management Act 1994 (section 220ZF (1) (b3) and (b4)).

The transition to ESFM and the recognition of the diversity of values of our forests and woodlands is very important in to our uncertain futures of climate change.

It is contradictory to ESFM that there is no prelogging site assessment or survey work and that there is minimal monitoring of the impact of the activities. ESFM cannot be achieved unless the logging operations are monitored, at all scales. The logging of one tree can be of significant and serious impact if, for example, it is one of few remaining old trees with hollows. The environmental impact of logging our native forests must be assessed and feedback in to decision making.

The cost and benefit considerations of PNF with respect to the public interest, including intergenerational equity, cannot be taken purely on the metric of cubic metres of wood. To achieve an outcome of ESFM we need to take stock in the most efficient way possible, for example, a forestry plan would necessarily entail a site assessment by an accredited assessor, how could it be any other way? There would need to be triggers for survey work, for example for Koalas. The Code of Practice and Harvest Plan requirements must be created by ecologists working in concert with foresters. The ecological perspective must prevail in the event of divergence of appropriateness of a particular prescription or proscription.

The impact of global warming and the explosion of consequences with the interaction of many other human induced factors from crashing insect populations to mass fish death to drought and flooding means that the forest and woodland ecosystems are increasingly important and precious. They are sanctuary, they are our buffer, as well as all the material benefits they provide.

The operation of PNF must be constrained. Sensitive lands include critically endangered plants and ecological communities, core koala habitat and Ramsar-listed wetlands. Vulnerable lands include steep slopes, highly erodible soils and protected riparian areas. It is also noted that 'category 2-sensitive' land would only capture critically

endangered ecological communities, so provisions must explicitly exclude PNF from all threatened ecological communities.

To approach ESFM, primary responsibility for PNF must be taken by the Minister for the Environment and its operations constrained. The Code of Logging Practice and Harvest Plan must include site assessment and monitoring.

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