

Name: Judy Boyden (President, HFFN)

Postcode: 2420

About you: Non-Government Organisation

Name of your business or organisation: Hunter Farm Forestry Network (HFFN)

1. What improvements should the NSW Government consider making to the existing Private Native Forestry Codes of Practice?:

a. The importance of soil conservation and maintenance of biodiversity is absolutely paramount and needs to be preserved and strengthened within the code. b. The codes of practice cover too large an area to specify good practice across the whole area. The western area of the Hunter for instance is a totally different ecosystem to the north coast with different species, different climate and different soils. The current code does not fit well into the western Hunter area. c. The code needs to allow different post logging management methods for different tree species. This also needs to include species that are not recognised in the present code eg some species that grow in the upper Hunter. d. The code needs to mandate protecting the future of the forest for a new generation of production. Logging practices that improve the health and diversity of the forest, must be mandated. These silviculture practices are well known but seldom implemented in current logging operations. Logging must allow regeneration of useful timber. e. Post logging forest management plans that detail sustainable regrowth and regeneration must be mandated and enforceable over the long term (at least a 20 year time frame). f. The code should encourage / mandate productive logging on areas that are going to be destroyed – eg mining areas and not allow resource to be wasted. g. The code should encourage the maximum use of a resource eg discourage the use of quality logs for fire wood. h. Regulating PNF needs to enhance our industry’s “social license”, and distribute the cost and risk equitably. PNF producers cannot solely carry the risks of drought, fire, weeds, disease etc. over decades and compete with imported products from less sustainable sources.

Please indicate which code/s you are referring to: Northern NSW Code of Practice

2. Do you have any suggestions to ensure the Private Native Forestry regulatory settings are

a. Regulations will only work if the regulator (the government agency) is stable, has expert and sufficient staff and are able to ensure that logging is done on a sustainable and long term basis. b. The regulator must have a responsibility for educating landholders and the industry

efficient, enforceable and effective?:

about good silviculture practice, long term regeneration and the regulations. c. The regulator must have a role in ensuring that landholders are fairly rewarded for their resource and that measurement and sawing of timber is carried out fairly. d. The regulator must have a role in approving forest operation plans prior to the start of work. This forest operational plan must not be just the responsibility of the landholder. e. The forest operation plan must not be prepared by the logging contractor as this creates a clear conflict of interest. Consultants and/or approved/qualified landholders must prepare the operation plans. f. Technology can now be used within a plan to identify trees that can be taken and those that cannot. g. Logging operations must be audited during and after the logging operation by the person who prepared the operational plan and also by the regulator. h. The regulator must have the ability to penalise and/or shut down operators who do not comply with logging plans and to enforce compensation to forest owners.

3. How can the NSW Government improve the authorisation and approval system for Private Native Forestry?:

a. The authorisation agency must be a regulatory authority which is stable and provided with sufficient expert staff to carry out their functions correctly. The regulator must have the ability to enforce regulation and penalise breaches of regulations. b. The focus on the authorisations must be for long term sustainable use of the resource and to ensure regeneration of the forest. The agency must act on behalf of the forest, not on behalf of a profit making enterprise. c. The authorisation must include a detailed operational plan which is based on good silvicultural principles. This plan must be prepared by a qualified person who is independent of the logging contractor. d. Post logging management of the forest must be mandated and audited. Post forest management must include weed and feral animal control.

4. What training and advice services would assist landholders, industry and the community?:

a. Landholder training must include forest ecology, Silviculture, forest growth and sustainable management practices and well as regulation, marketing and logging practice. b. The role of landholder based organisations such as Hunter Farm Forestry Network must be recognised and encouraged to assist and mentor landholders gain knowledge of forest ecology and growth. c. In the past both OEH and TAFE have run successful courses on silviculture, soils, logging etc. d. Training, knowledge of and expert advice to landholders must be mandated.

5. Do you have any other comments or feedback relevant to Private Native

a. Start with an open agreement that the timber resource is running out, that much of the forest has been degraded by poor logging practices in the past and that changes to the

Forestry that you would like to share with us?:

industry are essential. Good science and good practice has been overrun by short term commercial interest. Silviculture science must be used to manage the forests. b. Recognise that the timber resource is running out because of very poor past and present logging practices which have degraded large areas of the forest to the point that they can no longer regenerate and produce timber. Typically this degradation has been caused by “high grading” – that is taking only the most valuable logs and leaving low value logs still growing. This “high grading” prevents regeneration of harvestable timber. c. Recognise the conflict of interest when logging contractors can determine what timber is taken and also do the harvesting. This naturally leads to high grading and leaves a forest with no ability to regenerate. d. Recognise that the margins for harvest operations are very low and costs of machinery and operation are very high. This leads to the use of large scale machinery and hence increased damage to the forest. e. Recognise the fact that forestry has low community engagement or positive approval. It is a hidden industry. The industry needs community engagement and approval. This can only be carried out by having a transparent industry that can be seen to be producing a sustainable product in a certified and verifiable manner. f. Long term resource planning needs to be put in place. This means that some areas need to be designated for long term forest management. Other areas need to be designated for long term conservation. The resource planning needs to be mandated with the occupancy of the land and be an asset to the landholder. g. Small sustainable logging and localised milling operations should be encouraged in preference to large scale logging operations. h. Sustainable management of regrowth on previously cleared land needs to be recognised and encouraged as a legitimate forestry operation. Well managed regrowth is a long term forest asset with additional community and ecological values to plantations, and needs to be recognised at least in a similar manner to plantations.