

**Name:** Annie Higginson

**Postcode:** 2448

**About you:** Landholder

**Name of your business or organisation:**

**1. What improvements should the NSW Government consider making to the existing Private Native Forestry Codes of Practice?:** I provided a submission to the Draft Coastal IFOA in July last year which is on record for reference, or available via the above email. That submission raises many overlapping concerns/areas for improvement with the existing PNF Codes of Practice, however I also make the following specific points for improvement: - Make all public submissions in response to the PNF publically available, prior to the next round of consultation. and announce publicly, how public submissions have been taken into consideration. - Provide opportunity for public comment on any additional proposed changes to the PNF regulatory framework, including proposed legislative changes. - The Minister for the Environment should have primary responsibility for making PNF Codes of Practice and approving PNF plans. - PNF Codes should require consideration to be given to whether PNF plans are consistent with the PNF objects before plans are approved. - Require the PNF objects to protect biodiversity, water quality and soil quality, under a clear definition of biodiversity. - Add an additional PNF object “to ensure the contribution of native forests to sustainable global carbon cycles”. - Exclude PNF from all environmentally sensitive land such as threatened ecological communities. - Extend the public consultation period on draft PNF codes to a minimum of three months. - Require the Minister to make all submissions made on the draft code publically available. - Require further public consultation on substantial changes to draft Codes following initial public consultation. - Remove provisions specifying that failure to comply with the requirements for public consultation on draft codes does not prevent codes from being made or invalidate the code once made. - Require draft PNF Codes to be informed by a peer review by eminent ecologists to ensure biodiversity, water quality, threatened species, soil and carbon stores are protected, and make the peer review publically available. - Require public consultation on draft PNF plans prior to approval. - Require all approved PNF plans to be contained in a public register. - Formalise a process for monitoring PNF operations, including an assessment of the cumulative impacts of PNF on environmental assets over time. -

Formalise reporting processes in legislation and require reports to be made public. - PNF codes must provide clear, robust standards based on the best- available science, and protect all environmentally sensitive land from logging. - Maintain approval requirements for all scales of PNF. - Ensure ecological prescriptions are comprehensive and include all relevant threatened species. - Consider including habitat-based prescriptions in the codes. - Require site threatened species and habit surveys to be carried out by an accredited ecologist before logging operations can occur. - If retained, minor variation provisions must include additional requirements that improve transparency and accountability, for example a publically available statement of reasons for allowing the variation. - PNF codes should address and provide explicit and robust protections for koala habitat, and unmapped drainage lines, and against Bell Miner Associated Dieback and commercial firewood collection - the current codes are entirely inadequate.

**Please indicate which code/s you are referring to:**

All codes

**2. Do you have any suggestions to ensure the Private Native Forestry regulatory settings are efficient, enforceable and effective?:**

See details at 1.

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

See details at 1.

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

See details at 1.

**5. Do you have any other comments or feedback relevant to Private Native Forestry that you would like to share with us?:**

Sustainable Land Management? Human driven loss of trees affects wildlife, ecosystems, weather patterns and the climate. On top of which natural loss is accelerating with unprecedented fires, storms and 'weather' events not seen before and near impossible to predict or manage once the event is upon us/nature/your home and mine. In 2019, forestry harvesting is not sustainable. Replacement trees cannot grow back fast enough to plug the gap that harvesting leaves. Ask any timber merchant about quality

and availability. In the meantime, that loss feeds a downward spiralling hole of deprivation to all living things. What sounds reasonable on paper does not work in reality when the reality is changing faster than human and environmental health can cope, or adapt. This PNF's are supporting the privately held interests of a few while effectively putting greater amounts of carbon into the atmosphere at a time when we are urgently trying to meet climate targets to deeply decrease green house gas emissions. - a position that most scientists agree is necessary to avoid adverse social conditions, vast collateral damage and extinguishing of life. I suggest that if this is a genuine forum calling for ideas to improve the relationship of the government to the governed, then health and environment needs an urgent boost in 2019. In light of a failing planet, consider the sensibility of using government subsidises to relieve the economic 'hardships' of those who must give up PNF benefit - particularly if the subsidy was sourced from coal. This concept extends to all Forestry Agreements, and is hardly a new approach given Boral is subsidised to a very high level already in NSW. Thank you for considering my input to PNF legislation.