

## **PRIVATE NATIVE FORESTRY (PNF) REVIEW**

### **TERMS OF REFERENCE**

This submission makes brief comment on the PNF Terms of Reference Review. It is noted that the review of the Draft Codes of Practice will take place later in 2019.

Firstly, the Review lacks explanatory context. It alludes to deficiencies in current PNF arrangements and cites the need for “modernising” and to “reduce unnecessary regulatory burden”, but provides no detail. A brief background section would at least provide some context in which to consider these issues.

The recent Regional Forest Agreement (RFA) Review Paper advised that between 2007 and 2014, 553,400 hectares of private native forest in NSW had been approved for logging under PNF. It is assumed that approvals have continued apace between 2014 and 2019.

Given the scale and duration of PNF operations, it is not unreasonable for the public to expect a stocktake of the program as part of this major review, including an analysis of ecological impacts. The issues of habitat modification and disturbance in terms of ecological impact should be addressed. It is realised that such assessments are difficult given the narrow procedural parameters within which PNF Codes operate and the absence of on ground surveys to provide benchmark data from which later environmental assessments can be made. A system of sample surveys, before and after logging, across a range of habitats is required to give some credibility to claims of ecological sustainability. For instance, in the forests where I live, there is concern at the decline in arboreal mammal numbers including those of the Greater Glider.

The Review asserts that “through active and adaptive management... the environmental performance of our private native forests can be improved.” We look forward to a more detailed, science based explanation as to how PNF is to achieve this.

All large scale government programs involving natural resources management should incorporate climate change analysis. Large companies listed on the ASX now provide shareholders with analysis of climate change impacts on their current and future operations. Government agencies appear not to have grasped the significance of climate change in terms of their own management

responsibilities. The PNF Review flags the need to “modernise” existing systems. The incorporation of climate change in to the planning process would be a useful first step. The Terms of Reference should address this issue.

Predicted hotter and drier conditions across south-east Australia raise questions as how best to imbue our native forests with the resilience to withstand the stresses of climate adaptation. It is not clear how increased disturbance and modification caused by logging will benefit this process.

Climate change will also have an impact on bushfire regimes. Recent literature on the adverse impacts logging has on bushfire behaviour and intensity is pertinent but beyond the scope of these comments.

Of immediate concern is the fire hazard posed by PNF logging debris in terms of tree crowns left on the forest floor as they are of no commercial value. This large volume of logging slash is highly incendiary and constitutes a threat to people and property. PNF Codes should incorporate requirements for post logging fuel hazard reduction as part of the commercial operation. The Terms of Reference need to address these issues.

The Review Paper promises ecological sustainability and forest biodiversity protection, including increased landholder engagement and understanding “to ensure that environmental values are recognised and appropriately managed during PNF operations.” It is to be hoped that these undertakings are backed by commensurate levels of resourcing to enable government agencies to fully meet all these obligations.

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