

**North Coast Environment Council Inc.**

Honorary Secretary  
Jimmy Malecki



**NORTH COAST ENVIRONMENT COUNCIL INC.**  
NORTH EAST NSW - AUSTRALIA

The North Coast Environment Council is the peak regional environment group operating in North East NSW since 1979. Our membership includes more than forty member groups and individuals from Newcastle up to the Queensland Border.

The review of Private Native Forestry codes is particularly relevant to NCEC as the overwhelming majority of PNF operations occur on the North Coast and hinterlands. Our members are continually expressing concern in regard to PNF operations and frustrated by the EPA's poor response to reported breaches to current PNF codes.

Prior to European settlement, with only about 30% forest cover, Australia was the least forested of the worlds inhabited continents. Some 40% of our forests have been cleared since this time. Current rates of deforestation here are out of control, leading to Australia ( NSW and Qld) being included as the only developed country on the WWF International list of global deforestation hotspots.

Degradation and fragmentation of our forests are ongoing with forest health particularly in NE NSW moist forests being in severe decline due to factors such as Bell Miner Associated Dieback, currently expanding out of control in many areas.

The recent independent, systematic causal review of BMAD ( Silver and Carnegie, 2017) clearly identifies 'canopy disturbance 'ie logging as the primary causal factor, yet logging in BMAD at risk forests continues unabated and makes a lie of any claims of ecologically sustainable forest management. This latest research was not included in the RFA reviews and has not been given consideration in the IFOA remake. It should be carefully considered in the PNF review.

We are concerned that the stated Terms of Reference for the PNF review are designed to further prioritise timber harvesting and timber industry expansion at the expense of appropriate environmental protection.

Koala populations are being rapidly decimated by habitat removal and the water quality of our rivers and streams continues to deteriorate, yet the NSW Government continues to prioritise supplying logs to industry at the expense of appropriate environmental protection.

The recent remake of the Integrated Forestry Operations approvals for public forests was supposed to result in no reduction in environmental protection while maintaining timber supplies, however this has not been achieved. Reduced stream exclusions, increased logging intensities and diminished protection for Threatened species was the outcome of the IFOA remake and we fear that any review of Private Forestry Codes will result in a similar perverse outcome.

It is clear that considerable strengthening of the current codes will be required if claims of Ecologically Sustainable Forest Management are to be achieved.

The government's commitment to the Timber Industry Roadmap largely ignores the significant opposition by the wider community to native forest logging and was not subject to any meaningful community consultation before being adopted by government.

The 'leaked' Forest Wood and Products Australia (FWPA)-commissioned study found 65 per cent of the rural-based respondents said native forest logging was unacceptable. The native forest logging industry has no social license to operate and further reductions in environmental protection, as occurred with the IFOA remake will only increase community opposition to this insatiable industry and any government which supports its expansion.

The NCEC has long called for independent survey to identify threatened species and their habitats and appropriate regulatory measures to ensure their protection in the short, medium and long term, prior to logging operation approvals across all tenures.

We consider that current stream buffering, including unmapped drainage lines is inadequate and fear these will be further reduced as a result of timber industry lobbying. The state of our rivers continues to deteriorate and providing funding for piecemeal riparian restoration projects is largely being wasted if upstream logging exclusions on drainage lines, creeks, rivers and wetlands are not increased.

We believe that PNF should be excluded from all environmentally sensitive land such as core koala habitat, Threatened Ecological Communities as well as category 2 sensitive and category 2 vulnerable land.

We do not support self assessment by landholders or logging contractors for commercial operations at any scale or intensity. Even small scale operations have

the potential to remove key habitat features for threatened species with significant negative outcomes, particularly where there is insufficient available habitat nearby.

NSW native forests have multiple values including carbon sequestration, biodiversity conservation and maintenance of water quality, yet the review of PNF is overwhelmingly concerned with short term timber supply at the expense of other values. Private forest owners should be provided with meaningful incentives to pursue the enhancement of non timber values of their forests for wider community benefits.

The NCEC have provided numerous submissions in regard to both public and private logging changes in recent years, yet none of our recommendations to improve environmental outcomes from logging have been adequately considered or adopted. We have little faith that the current call for submissions will result in changes that improve environmental outcomes, rather they will give greater ease of access to log the remaining forests across the private estate.

The North Coast Environment Council fully supports the submissions to this review provided by the NSW Environmental Defenders Office as well as that provided by the North East Forest Alliance.

Yours Sincerely

A handwritten signature in cursive script that reads "Jimmy Malecki".

Jimmy Malecki