



NSW Bird Atlassers Inc

*A group monitoring birds in New South
Wales*

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Private Native Forestry Review
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Dear Sir or Madam

Thank you for your the opportunity to make a submission to the Private Native Forestry Review. The NSW Bird Atlassers is a group of dedicated bird observers, ornithologists and bird experts. With the aid of reports of bird sighting sheets sent in monthly by members since 1975 and from regular twice-yearly bird camps the data is processed, culminating in the publication of Volumes I and II of An Atlas of the Birds of NSW and ACT. Volume III is at the printers and will be available soon.

The writer has used the online questions in preparation of our submission which was found to be a bit difficult for the purpose of the Bird Atlassers, but nevertheless helpful. Notwithstanding issues of most concern have been covered and are enclosed with this file.

The Southern Forests are not included because they are the ones of which the writer has the least experience, however the others covered are quite familiar. On reading the Codes covering some of our vulnerable birds, eg Turquoise Parrot it does seem that the Codes are not sufficient to ensure that this parrot among others, will not become more endangered. All of the Codes for endangered and vulnerable species unless made far more strict, will no longer ensure the survival of many species. It is only through our forests that they will continue to lighten our lives, because the former Native Vegetation Act has been so watered down as to allow the almost total destruction of the habitat these animals need to be viable. No doubt those whose business is in private native forestry will wonder at this imbalance, but that is the stage we are at – it seems that only the forests are left to protect biodiversity and ecosystem function.

Yours sincerely

Jane Paul
Conservation Officer

NSW BIRD ATLASSERS SUBMISSION Private Native Forest Review 6 February 2019

Jane Paul
[REDACTED]

About you

- Individual
- Business
Government Organisation
- Non-Government Organisation **Yes**
- Landholder
- Private Native Forestry Industry

Name of your business or organisation NSW Bird Atlassers Inc.

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

Please indicate which code/s you are referring to

- Northern NSW Code of Practice Yes
- Southern NSW Code of Practice No
- River Red Gum Code of Practice Yes
- Cypress and western hardwood forests Code of Practice Yes
- All codes

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

The Codes of Practice must exclude Private Native Forestry in environmentally sensitive areas such as threatened ecological communities, koala habitat or Ramsar wetlands, and be prohibited by excluding it from 'category 2-sensitive' and 'category 2 – vulnerable' lands identified under the LLS Act, as well as all threatened ecological communities.

The draft Codes will be improved by requiring they 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 publicly available (EDO 2019).

All landholders must give a report of their activities and so also should there be a formal process for monitoring PNF operations which can include an assessment of the cumulative impacts of PNF on environmental assets over time. Onground audits by experts is another way of monitoring this progress and thus preempting problems before they might occur.

Specific goals that could be adapted from Western Australia in 'developing forest management plans are the conservation of biodiversity, sustained health, vitality and productive capacity of ecosystems, protection of **soil** and water resources and sustained contribution to global carbon cycles'.

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

The Environment Protection Authority has the task of investigating and enforcing forestry breaches. There must be no conflict of interest with the Authority which must on all occasions act in the best interests of the forest. Assurances of sufficient resourcing to act thus will be needed to ensure all breaches are properly investigated and penalised in particular for significant harm to the environment. Some shocking instances have occurred especially in destruction of habitat trees for endangered birds that have received little more than a slap on the wrist. NSW Bird Atlassers **recommend** that the EPA is properly funded to carry out its obligations and to act with strong penalties.

Options for permitting low-intensity operations on private land without the need for approval and a focus on outcomes rather than process must not be allowed. Such change would inevitably lead to a reduction in environmental protection or even open up environmentally sensitive land to logging. There must be clear and robust standards and assessment and approval requirements must not be reduced in order to avoid poor environmental outcomes.

NSW Bird Atlassers **recommend** that there must be approval and oversight of all and any low-intensity PNF operations.

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

It is of considerable concern that responsibility for PNF has shifted from the Minister for the Environment and Office of Environment and Heritage to the Minister for Lands and Forestry. It is quite wrong to water down the role of the Minister for the Environment when such move can open up the way for conflict of interest, such as meeting supply demands, and pressure from landholders, which is the domain of Forestry. Forestry activities will inevitably have significant environmental impacts requiring Codes of Practice and approval of PNF plans which should be the primary responsibility of the Minister for the Environment.

Any authorisation and approval system must include in its Codes the protection of habitat (feed and nesting) trees, and emphasise the value of 'old-growth' trees and areas that could be biologically intact.

NSW Bird Atlassers **recommend** that authorisation and approval system for Private Native Forestry be the prime responsibility of the Minister for the Environment.

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

■ Training in silviculture, biodiversity, soil preservation & erosion control are mandatory for a PNF operation. However there needs to be more emphasis placed on biodiversity aspects of the Code that includes the

- * implementation of biodiverse areas with retention of corridors for wildlife movement that will ensure the need for retaining and maintaining biodiversity, (which needs to be defined as in the Biodiversity Act)

- * the retention of next cohort of trees for every plant & habitat tree requirements as determined with advice by experts i.e. a specified number / hectare with

- * all old-growth retained,
- * reports by landholders of activities;
- * there should be gradual changes to the vegetation to allow animals and plants to adapt;
- * on-ground audits to be conducted by experts;
- * most importantly the promotion of trees for the essential services that they provide.

NSW Bird Atlassers stresses these points as they are so vital to the conservation of birds and other fauna,, and vital to the health of the forest in keeping its integrity (especially in the fight against incursion by Bell Miners in the North Coast forests).

To assist the community and industry in acceptance of these new Codes

- public information days should be held with talks on the advantages of the above and so developing a pride in a community or area that supports a viable and sustainable forestry industry. Through sustainability there is certainty and the knowledge that exploitation will be heavily fined (or worse) through the implementation of the new Codes. Included in these will be
 - the value of sensitive and important environmental assets;
 - as forestry operations can have significant, detrimental impacts on the environment and biodiversity, including threatened plants and animals, water and soil quality, and on carbon emissions, advice services will be required to emphasise the principles of ecologically sustainable forest management which is focused on the protection of biodiversity and the health of native forests' (EDO 2019).
 - Aboriginal and non-aboriginal cultural heritage will be recognised with surveys of a forest by an anthropologist before any approval is given; and that they are properly managed in consultation with community stakeholder groups,
 - accreditation and effective training program for haulage and harvest contractors to be put in place and properly monitored;
 - the value of the native timber industry will be explained reiterating that best practice is always the norm for all timber operations, these will all assist landholders, industry and the community.

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

The NSW Bird Atlassers are extremely concerned at the critical state of our koala population, as no doubt is every other thinking Australian. It is a sad truth that this has been brought about by inadequate protection given to their habitat. Further protection of the koala over and above Sepp 44 is for PNF Codes to include 'potential koala habitat' in the Codes especially as Koala Plans of Management are not adequate as all are not in place, and the promised mapping is not sufficiently comprehensive. The Codes must include explicit and robust protection for the koala as so much of its important, and even what some might term unimportant, habitat is being logged, or cleared in many cases, especially since the demise of the Native Vegetation Act. A qualified ecologist must be engaged in koala surveys as the animal can be quite easily missed, scats may not be found, other signs unobserved, before logging operations can occur.

A further concern for the Bird Atlassers is Bell Miner Associated Dieback, which is a Key Threatening Process. Research is indicating that control of lantana and weeds post-logging can be sufficient deterrent to the birds as they no longer have suitable understorey for nest sites and shelter. That is why we believe an enforceable requirement for weed control after all logging operations must now be mandatory. The loss of small birds from the northern forests is being keenly felt where the Bell Miners have taken hold. As well many species of fauna are dependent on the structure provided by eucalypt forests and the loss of canopy trees will affect gliders and possums for example which are prey for large forest owls, four of which are on the Vulnerable list. In turn hollow-bearing trees may be lost, another Key Threatening Process under the Threatened Species Conservation Act 1995.

We **recommend** that 'potential koala habitat' be written into the Codes, and that **control of weeds**, especially lantana post-logging be an enforceable requirement.

I would like to receive project updates

- Yes Yes
- ~~No~~

Mark my response as confidential* All submissions will be published unless marked confidential.

~~Yes~~

- No No