

## **James Ronald Rankin Submission to the New South Wales Private Native Forest Code of Practice Review – 2019**

Submission prepared by James Rankin

Working experience of 35 years in North Coast Forests

Company Forester involved in private native forest harvesting on the North Coast of NSW

Employed by Hurford Hardwood Kyogle

Responsibilities include: Quality control of logs sourced from Forest Corporation of NSW and Private Forests

Assist landholders in applying for a PNF

Assist contractors in harvesting operations

Liaise with government departments in relation to PNF code

### **1. What improvements should the NSW Government consider making to the existing Private Forestry Code of Practice?**

Having worked with the code for seven years I believe it clearly helps to provide good outcomes for all the stakeholders involved. There are areas that can always be improved upon in any code to reflect changes that occur during time and lessons learnt.

I personally believe the regulations relating to the protection of our drainage features, cliffs, caves, rainforest, soil and wildlife are more than adequate with the protection they provide.

That is why I believe there is room for update and change now to some sections of the present code.

The code needs to reflect changes to the present environment and ever changing forest structure of the regrowth forest of the Far North Coast.

#### **Australian Group Selection**

The use of canopy opening is restricted to stand height. There is scope that a more direct approach and a set size canopy opening may be used instead of the calculations required in the present code. Eucalyptus require space for growth and to restrict that size in relation to stand height may be the difference of a small 40 meter opening to a 80 meter opening. My experience is that areas between 6,400 square meters as minimum and 8,000 square meters as maximum will give sound results in regeneration.

The shape of an opening should be allowed to fit in with existing regrowth, retained habitat, roads, drainage lines and all other retained features. This would help in regenerating areas of forest that are infested with noxious weeds or off poor or no stocking rates of eucalyptus.

## **Habitat and Retention Trees**

The current code does not reflect what is in the forest in relation to habitat and retention trees. These forests have all been harvested at least twice or three times in most landholder's time of ownership. Most forest has uneven age class and diameter size.

Retention trees in the next cohort are no problem to maintain in a regrowth forest. If we are to leave the larger good size trees spaced evenly to meet a prescription in the code, then we are going to degrade the forest and prevent future regrowth. This approach is not reflected in the code in relation to habitat and retention regulations

The auditing rule by EPA for habitat retention at present in January 2019 is.

**If you cannot find a tree of the same species and size within 25 meters radius of the tree you wish to harvest, you cannot harvest that tree.**

This rule of auditing will basically stop or greatly reduce areas for harvesting of regrowth forest that have uneven age and diameters.

Retaining habitat trees can be a problem when they are not there across all species present. Certain species will make better habitat than other species in a forest. The code does not allow for the habitat retention trees that occur along drainage features unless it is only in the buffer zone. The whole area including exclusion and buffer zones along drainage features will contain most of your habitat and retention trees because this is one area that has had a lot of protection for many years from disturbance.

Exclusion zones are within the PNF area of the property. The code should reflect this. Grouping or clustering of trees that would meet habitat requirements reflects what you find in the forest. The code should reflect this.

Retaining habitat trees that will make habitat trees has and will always be one of the most important aspects of forest management.

There has to be a balance if we are also responsible to promote regrowth as per the code.

## **Minimum Stand Basal Area**

This table needs changing to the same basal area for all forest types. It discriminates one stand to another simply on stand height and species. Set it at around 10m<sup>2</sup>/ha across the range.

The other problem it also does not allow for a stand of timber that may be very degraded from disease, fire or drought.

## **Listed species ecological prescriptions**

How long does a record last on PNF map when a listed species is identified?  
Is there a review process to identify if current records are still accurate for that PNF?

Information on the map of when the record was entered into the system and by what survey method was used, should be adopted. This would assist landholders in the planning process for management of their properties. All species have a certain life span as with trees.

The bigger habitat trees that are required for a number of species may have died, or been destroyed by fire or storms. This will no doubt move the species on to other areas.

There are a number of prescriptions that require intensive groundwork so as to comply with the code.

If the species is now no longer in the area due to any number of factors, can the record be deleted?

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

The main problem I have encountered is the way people interpret the code. The code is a guide to achieve sound outcomes for the environment, landholders and industry. I believe that the large majority of stakeholders in the industry do adhere to the code.

Landholders use their resource as another part of their business. The majority of landholders have well managed forests that have produced a renewable product for many years. As we all know timber is the only renewable resource and will be for a long time into the future.

Grant the LLS the scope to help with the audit of operations and then the EPA notified if a problem needs further action. There seems to be an overlap of some regulations and advice given by the LLS that the EPA may not see as adhering to the code.

The LLS, as the approval body of a PNF should have the first say as to if the code or other advice or consent is being completed satisfactorily.

There are quite a number of landholders that do not live on their properties. There are many properties that share an access road with multiple properties. Many properties in our region have no fencing. These owners raise concerns about damage to roads and extraction tracks well after harvesting is completed. They find that trespasses using motorbikes and 4wd vehicles can do a lot of damage over time. Wild cattle, horses and feral animals also cause a lot of damage.

They would like to see more checking done during operations, than audits done well after harvesting is completed.

After harvesting is completed what is the time frame for a suspected non-compliance to the code?

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

At the moment I believe there is a lot of overlap with other governing and regulatory bodies. This can cause some confusion to landholders in the management of the property.

Habitat retention and harvestable areas can conflict with some local council regulations.

Property management plans; incorporating native forest harvesting could be introduced allowing landholders to manage their properties more efficiently. If a property owner developed a management plan this may allow a longer time frame on the life of an approved PNF. The current time frames barely cover one harvest operation. Long-term approvals will benefit all stakeholders in the long term.

### **4. What training and other services would assist landholders, industry and the community?**

Training and on site visits in the understanding of desired outcomes the code is trying to achieve, would benefit all who are involved in private native forestry industry. Regular visits to active operations by both authorities would be much welcomed by all stakeholders. It is easier to fix a potential problem earlier than later.

Training and advice of the continual management of the timber stand after harvesting. The majority of harvesting operations may only last a month or two. When you consider this will happen around every 15 to 20 years there is a lot of other work that is required to maintain that forest for future demand. I have been involved in discussions with new property owners of the future potential of their timber. People buy properties with no or very little knowledge of its potential for the production of timber in the future. Some see it as obstacle that will interfere with the cattle business of the property. Provide information packages for new owners on the importance of timber to the property.

New and current owners also express concerns that certain activities are stopped or restricted in approved PNF areas. They believe it is a grey area for them. Some of these concerns are: pasture improvement, HR burning, control of weeds, and maintenance of dams, maintenance of roads and access trucks well after harvesting is completed and removal of some woody plants.

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

I would like to think this review is about sound and workable outcomes, so as a industry, we can continue to harvest timber to community expectation and values, while being economical and sustainable into the future.

The importance of the timber industry to this country is extremely important both socially and economically.

We already have some of the most stringent regulations in the world. As a country, are we happy to close down another industry, only to import our wood requirements from overseas, not knowing how or where it was sourced?

I thank you for the opportunity to have my say about the review of the PNF code.