1. Currently they are no on ground surveys required prior to logging approvals. It should be a requirement that independent ecological and cultural surveys be performed before approvals for commercial scale logging. Private lands have largely never been surveyed and as result no one knows the conservation values or threatened species present. 2. No local knowledge or even that from other scientists in the dept allowed. In the case of I refer to - Mount Rae forest - government scientists were aware of the very high conservation values of lands here, numerous threatened species (including NSW endangered orchids and bird species such as Gang gang cockatoos on lands NOW approved under PNF for firewood logging). The governments own ecologists from the Threatened Species Unit (south) had written to local council of same. They had recommended no further removal of trees, as the trees themselves were considered “significant” and forming a forest from under represented vegetation types (now EEC’s). The forerunner to LLS - CMA’s were well of these values. Council listened and opposed the logging plans. Then under PNF no one bothered to check any of these details - the depts formerly involved were no longer consulted and the same plans approved under PNF. Perverse outcomes delivered, scientific input ignored. 3. following on from the above point - significant public funds are expended on trying to encourage landholders to protect native vegetation, replant riparian area and habitat corridors, the PNF CoP facilitates the destruction of mature vegetation of high conservation value. In the case I refer to local landcare had been linking plantings on farms as wildlife corridors to this very forest. $100,000’s of taxpayer dollars. This forest -the site of field days, and other landholders entering Conservation Agreements in perpetuity with the NSW Government, that recognise the very high conservation values, EEC’s, and threatened species of these lands. The same ones approved for commercial firewood logging under the guise of PNF farm forestry?? One property a managed site under the NSW Governments SOS programme for the very same NSW Endangered orchids next door. One property working with
one gov. dept to save from localised extinction. Next door another gov dept working with a firewood merchant causing the extinction. How does this make sense. Please make the necessary changes to work together in the future LLS and ensure such things will not happened again. 4. A review is needed of the list of individual protections for forest and woodland dependent threatened species. Since its introduction in 2007 (and despite 100s of thousands of ha’s of logging approvals) they’re are no protections for the Gang gang cockatoo. This species is listed as Vulnerable in NSW and is a focus of the NSW governments Saving Our Species programmes. It is currently afforded individual protection under NSW Forest Corp logging regulations but receives none under the NSW Environment Minster individual protections under the PNF Southern Code of Practice. 5. The department does not regulate the end product, stating the OEH is only concerned about biodiversity and environmental impacts of logging and the end product does not alter this outcome. If the Office of Environment and Heritage, and the NSW Environment Minster who grants bio-certification of PNF are serious about environmental impacts then they should ensure that commercial logging of threatened species habitat cannot be for the sole production of such low end products as firewood, woodchips and biomass when their own scientists recognise the impacts of carbon emissions and fossil fuels. Please refer to the above mentioned case - Mount Rae forest - to see how these approvals are logging carbon sinks (and EEC’s and homes of TS) and then sending them straight up a chimney. No storing of carbon in the end product in this case. Bio certified firewood by the NSW Env.minister and LLS? 6. Individuals were perviously prevented from felling on areas over 18 degrees of slope. The PNF codes allow commercial logging on lands of 30 degree of slope. This can only lead to increased erosion, soil loss and sedimentation of waterways. Thank you for the opportunity to comment. I am more than willing to meet and discuss the perverse outcomes that are being produced under PNF in an effort to achieve better outcomes under LLS.

Please indicate which code/s you are referring to:

Southern NSW Code of Practice

2. Do you have any suggestions to ensure the Private Native Forestry regulatory settings are

Its pretty hard to enforce breeches that occur on private land, when no one can enter to see them? How would anyone know what breeches are occurring without on ground independent surveys identifying areas needing protection in the first place. In most cases areas just need to
efficient, enforceable and effective?: be left to regrow - this is measured by trees - but what of understory plants and values, rare orchids etc. In the case I have referred to NSW endangered orchid habitat is destroyed (along with 20 other orchid species and 10’s of plants, forbs herbs and grapes) with bulldozer blades, skid steer equipment etc and then goats and sheep have been introduced. What regulation has been done to protect these ecosystems under PNF? none. pretty hard for anything to be efficient and enforceable, when the issues are just ignored by the depts involved. any regrowth here is mostly bracken fern. Land conversion by stealth, but the OEH, and now LLS, only seem to focus on tree regrowth (forestry) and ignore understory and ecosystem values. Not worthy of OEH or now LLS.

3. How can the NSW Government improve the authorisation and approval system for Private Native Forestry?: Independent ecological and cultural surveys are necessary PRIOR to approval. Authorisation should not be given to PNF operations in threatened species habitat for the sole purpose for commercial firewood.

4. What training and advice services would assist landholders, industry and the community?: Landholders need to be advised of conservation values of their lands before approval. Supplying landholders with links to OEH list of EEC’s and Threatened species is largely redundant when PNF encourages a ‘don’t look don’t find’ approach in the first place. Advice needs to be of what is the values of their lands - how else can anyone talk of improving it, maintaining it or protecting values that have not been identified. Independent surveys to provide the necessary facts before logging is necessary. Are landholders informed of other programmes operating for conservation of their lands and funding opportunities? The community is entirely left out in the current PNF process. No local input or local knowledge is allowed or considered. Many community members and groups know full well the values, which in some cases are then ignored under PNF or the impacts to surrounding lands from erosion, sedimentation of dams and amenity. The first most people know is when the bulldozers start up next door.

5. Do you have any other comments or feedback relevant to Private Native Forestry that you would like to share with us?: I have had many meetings in the past with the relevant authorities when PNF was an interim act. I presented in the hope that any final act would take into account on ground examples (such as Mount Rae forest - perhaps Whian Whian in the north) and the result would be an outcomes that better balances the ecological and economic interest involved. It seemed that the outcomes were all pre determined and my input largely ignored. However if anyone at LLS is genuine I am more than willing to meet
and discuss the perverse outcomes that are being produced under PNF in an effort to achieve better outcomes under new magnet. Thank you.