

This is still a debated issue in NSW and the Institute's stance within the document is as strong as ever.

The IFA has included this submission on its website in response to requests of several members.



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Executive Director
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Re: Draft Best Operating Standards for Private Native Forestry

Thank you for the invitation to comment on these draft Best Operating Standards (BOS).

It is a first step in the right direction. Although much of the required harvesting operational detail is present most of my concern is with the context in which the detail is set or the appropriateness of the prescription. I recommend further refinement of the draft before contemplation of public release.

The document is a mixture of sound advice and prescription and the distinction is not always evident. A redraft might more clearly differentiate the two components. Currently it is an unhelpful combination of best practice guidelines and a code of forest practices, aimed to mitigate the environmental impacts of harvesting. Ideally, both are required, but it may not be helpful to have them in the same document. While a code of harvesting practices has to be prescriptive, best operating guidelines should offer landholders some broader assistance. Some of the material currently contained in this section, such as the page on silviculture, is meaningless without any further detail.

A first impression of the document conveys a sense of restrictive prescriptions—consequently, the “do’s” often incur operational costs, the “don’ts” incur opportunity costs. Whilst this is inevitable to an extent, there is usually no corresponding sense of relief from burden. For example, in Section 2.2 Objectives there is no objective addressing the imperative of a commercial return

to the landowner. There is little positive evidence to provide a landowner with confidence that forestry is regarded by government as a legitimate land use which has a sustainable future when practised under best operating practice. A BOS should not only “allow” sustainable forestry under circumstance, it should encourage sustainable forestry.

Sustainability has been defined in accordance with the criteria outlined by the Montreal Process. The Montreal criteria and indicators have been adopted for the Regional Forest Agreement regions to define and quantify sustainable forest management. However, the scales at which the criteria and indicators have been applied for public forests are large regions. How do some of the criteria, or elements of sustainability mentioned in this document, actually relate to the scale of individual landholdings? That connection is missing from the BOS. How the following prescriptions in the document relate to all of the forest values is not clear.

The text on sustainability and its expression in the harvest plan application is inadequate. Although sustainability is referred to, there is only a passing treatment of the concept, and no discussion on the impact of harvesting on sustainability of the full range of forest values. Although further information/instruction on this complex topic might be planned by the Department, without it it would be difficult for a landholder to write its context into a plan and even more difficult for the Department to judge the sustainability of an individual plan.

One might argue that sustainable forest management at the small scale of an individual property is not possible, or is at least impossible to quantify without the context of the larger landscape. It appears therefore doubtful that objective and consistent determinations on applications for native forest management can be made based on this document and related legislation.

Some of the draft is not appropriate or necessary for private property timber harvesting. It obviously draws heavily from the State Forests of NSW prescriptions arising from the legislated regulation of its activities on State forests. Not all such prescriptions are suitable for private property. The tenure of State forests is such that its size and distribution and its government ownership lends itself to carrying a disproportionate responsibility within the landscape, especially for ecosystem and fauna conservation.

Some State forest prescriptions have a basis of “public good” or electoral support rather than a scientific background and they were often drafted with scant regard to consequence on the economic viability of timber harvesting. A more critical review of the BOS prescriptions is warranted with an objective of rejecting inappropriate or unnecessary requirements.

Some prescriptions should be universal, such as the need to protect a certain level of water quality, but others may well have been designed with a nil contribution from private property in mind; for example some fauna habitat retention prescriptions. Without any landholder compensation mechanisms in place, these prescriptions should be relaxed for private property. It cannot be reasonably expected that private landholders should pay for the management of a public good such as biodiversity. This is particularly problematic in RFA regions, where comprehensive, adequate, and representative reserve systems have recently been established.

The BOS must be more conscious of the economics of private property harvesting. Harvesting exclusions for environment value conservation are mostly costly to the landholder and cannot be as easily borne as some public forest operations. Harvesting management costs can be critical and the BOS should always look for flexibility in application. For example, the necessity for field marking of filter strips should be optional. The important outcome is that the desired result of protection is achieved, not that the filter strip is marked.

The flow diagram associated with the Draft Best Operating Standards points to the importance of exemptions for Private Native Forestry and also to the strong influence Regional Vegetation Committees (RVCs) can have on Private Native Forestry. In that context this Institute is very concerned that the independent scientific panel reviewing the exemptions has no forestry expertise, and that RVC's can be composed of groups without any forestry expertise. In this regard the process lacks credibility and it is questionable whether the regulation of sustainable forest management for all forest values on private land is achievable.

Some specific comments relevant to particular passages of text are attached.

Once again, thank you for the opportunity to comment.

Yours faithfully

Ian Barnes
Chairman