

**Submission  
No 43**

**INQUIRY INTO LOCAL LAND SERVICES AMENDMENT  
(MISCELLANEOUS) BILL 2020**

**Name:** Mr David Dawson

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February 24, 2021

The Director Portfolio Committee No. 7 – Planning and Environment, Parliament House,  
Macquarie Street, Sydney NSW 2000.

**Submission - Local Land Services Amendment (Miscellaneous) Bill 2020**

By David Dawson, Bachelor of Science in Agriculture (Syd Uni)

By email: [portfolioCommittee7@parliament.nsw.gov.au](mailto:portfolioCommittee7@parliament.nsw.gov.au)

Dear Sir/Madam

I wish to make a Submission to Portfolio Committee No. 7 - Inquiry into the Local Land Services Amendment (Miscellaneous) Bill 2020.

I note that there are 30 submissions already published by the Committee on the website: <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2639#tab-submissions> and that ALL are from ENGOs and affiliates. Further, I note that one of these mentions that an invitation to make a submission was emailed on December 9, 2021. I find this situation quite interesting when one considers the need for objectivity and balance in a process governed by established Parliamentary procedures.

I have many years' experience in both forestry practice and policy through family farm business and career roles respectively, and a strong scientific and personal interest in silviculture and forest ecology. As such, I have closely followed the debate about Koalas, their populations and management, and the research that has been conducted, for well over a decade.

And much of this debate is skewed for political purposes and by ideology; many key facts are lost or overlooked and it contains significant mis-representation and mis-information. I have compiled a list of facts and information that need to be accounted for in considering the Local Land Services Amendment (Miscellaneous) Bill 2020:

- NSW already has a very large national park and reserve system for conservation and biodiversity.
  - There is near 3.1 million hectares of publicly-owned forest estate on the NSW North Coast between Newcastle and the Tweed River; of this, 88% (2.7 million ha) is reserved from timber harvesting, and only 12% (366,400 ha) is available to industry
  - In the 30-40 year forestry grow-harvest-grow cycle, only 1-2% of the remaining State Forest sees any harvesting activities

That much of the 3 million ha of land now in conservation status was formerly under active management for wood production and became worthy of change in tenure at election time is interesting in itself, but that the act of simply changing tenure and lines on maps is assumed to automatically save, protect and confer better conservation outcomes, makes no sense. Forests are not un-managed exhibits on one side of a line and sustainable timber producing systems on the other.

Un-managed landscapes are plagued with a lack of resources and investment; they see declines in eucalypt, habitat and Koala health and resilience; the pest and disease burden increases; bushfire frequency and intensity increases; and ultimately, the ecology of the system collapses.

It follows that the focus should be investigating on the actual performance of the existing reserve estate in achieving real and measurable outcomes in supporting the Koala population. It is not even apparent what auditing of Koala habitat and its health is done in national parks.

Hence, it is misguided, inappropriate and even wasteful to consider further expansion of conservation areas without knowing how well, or not, the existing conservation estate is performing its legislated and expected role.

- The research conducted and published by Dr Brad Law of NSW DPI has shown that Koala populations are found in native forest harvesting areas, and where timber harvesting has been conducted for many years. This is because these forests contain healthy, growing feed trees and shelter habitat. The same situation occurs in private native forests, in which forestry activity is even less intensive.
- The phrase 'land clearing' is commonly, and often purposefully, used in the context of describing forestry operations in NSW. This is wrong as the rules and protocols contained within the regulations do not actually permit 'land clearing'. Rather, only science-based selective harvesting procedures occur under the stewardship of science-trained silvicultural professionals, ie foresters.
- Attention needs to focus on the actual and compelling core threats to Koalas, ie. fire, vehicle strike, dogs (urban and feral), disease, genetic diversity and decline in habitat quality (as opposed to decline in habitat quantity). Strategies to better manage the reality of these ever-increasing threats must be addressed, especially given that many Koala habitats are near urban/peri-urban areas.
- The most significant threat to koalas is intense bushfire – 'wildfire'. The devastating 2019 wildfires nearly all originated in and erupted from un-managed National Parks & Reserves, where hazard and fuel reduction practices are not practised, which is in fact contrary to how most of the forests evolved under Indigenous management and its regular 'cool-burning/firestick farming". In the absence of fuel reduction and appropriate resourcing, we can only expect more wildfires to occur, with consequent impacts on the Koala population.
- Little if any attention is given to adopting the key features of species recovery programs used around the world, which is astounding given the apparent urgency of the problems faced by Koalas. Co-ordinated, science-based and best-practise programs and facilities are required to provide disease control (population scale), veterinary care, breeding-up, re-homing services and active and adaptive plans of management for habitat.
- Private native forestry operations are typically small-scale and low intensity, and when considered on a landscape level, are not a key threatening process for koalas. A suite of established and well understood regulations and operating Codes are in place to account for their needs in private native forestry operations. For instance, under the Code, sensitive and significant environmental features such as riparian zones, old growth, steep slopes, rainforest and habitat trees are among the special prescriptions that ensure the management of habitat.
  - Further, Private native forestry is subject to regulatory management and oversight by two NSW Government agencies: Local Land Services assists and approves private native forestry plans, and they are regulated and policed by NSW EPA.

<ENDS>.

*David Dawson B. Sc. Agr*