



TIMBER NSW

28 February 2016

Draft Hunter Regional Plan
GPO Box 1226,
Newcastle
NSW 2300

Dear Sir/Madam

Re: Submission on Draft Hunter Regional Plan

Thank you for the opportunity to make comment on the Draft Hunter Regional Plan.

Timber NSW was established in 1906 as the representative organisation of the timber and forest products industry in NSW. The NSW timber industry contributes around \$2.4 billion to the State's GDP and directly employs over 22,000 people. Timber NSW's mission is to work with our members, stakeholders and the broader industry to build an economically, environmentally and socially sustainable timber industry in New South Wales.

While Timber NSW exists principally to represent the interests of the NSW timber and forest products industry, we are also concerned with broader issues. Within the Hunter Planning Region there are over 167,000 hectares of State forest and several hundred thousand hectares of privately owned native forest. These forests play an important (multiple-use) role in sustainable timber supply while protecting biodiversity, providing clean water catchments and acting as long term carbon stores. Failure to formally recognize these forests and the contribution they make to the regional economy is major oversight of the draft plan.

Each year every man, woman and child in Australia consumes the equivalent of one cubic metre of timber. When we build our homes, renovate our kitchens and fit-out our offices, we rely on timber. For key infrastructure like wharves, bridges, railway sleepers and telegraph poles, we rely on timber.

It is appropriate therefore that the Hunter Regional Plan recognise and celebrate that its region is an important timber producer.

Within the region long standing timber processing facilities are located at Heatherbrae, Buladelah, Tea Gardens and Millfield near Cessnock. These are sustainable stable businesses that rely on the supply of renewable timber from the region's native and plantation forests. As an example, the Weathertex factory at Heatherbrae was founded in 1939, employs 100 staff and is currently expanding its business at 10-15% per year with growth markets in India and Europe.

To give due recognition to the region's timber industry we seek amendments to the draft Plan as detailed in the box below.

AMENDMENTS PROPOSED UNDER GOAL 2

(proposed text changes shown in bold)

1. Goal 2 to read – Long standing coal mining, viticulture, equine **and timber industries** will continue to prosper on the world stage.
2. Direction 2.1
 - Modify paragraph 1 sentence 2 to read – The region is already recognized as a major supplier of coal, energy, wine, thoroughbred horse, **timber** and oysters, to global and national markets.
 - Modify paragraph 5 sentence 1 to read – The Hunter's viticulture, equine, **forestry** and oyster and aquaculture industries are as mature as its coal mining industry.
3. Action 2.1.1 Developing alternative energy sources in the Hunter – Renewables
 - Modify sentence 2 to read – It has natural solar, wind, **biomass** and geothermal resources to delivery large-scale projects.
 - New sentence 4 to read - **In relation to biomass the NSW Government's Department of Primary Industries is in the process of quantifying the availability and sustainable supply of forestry and agricultural residues on the NSW north coast.**
4. Action 2.1.2 Support the growth of the region's important primary industries
 - Modify paragraph 2 sentence 2 to read. Figure 9 indicates the location of selected primary industries that support well-established industries supplying global and national markets, including (as dot point 3): **important State forest timber resources in the Watagan, Dungog, Gloucester and Buladelah areas**

5. Action 2.1.3 Develop local strategies to support sustainable agriculture and agribusiness

- Modify heading to read - Action 2.1.3 Develop local strategies to support sustainable agriculture, **forestry** and agribusiness
- Modify sentence 1 to read –The NSW Government is working with councils and industry to develop methodologies that identify important locations for agriculture **and forestry** within the region
- New sentence 3 to read – **In relation to forestry the NSW Department of Primary Industries has a strategic planning project underway that will identify important timber resources within the region that are under private ownership**

6. Action 2.2.2 Develop strategies for enhancing tourism infrastructure to increase national competitiveness

7. Modify paragraph 4 sentence 3 to read – Scone, Gloucester and Dungog provide entry points to the vast World Heritage Area of Barring Tops National Park **and extensive areas of multiple use State forest that support off road touring and camping, mountain biking and hunting.** Direction 2.4 Manage competing and conflicting interests in rural and resource areas to provide greater certainty for investment

- Modify sentence 1 to read – This draft Plan identifies strategic locations and priorities for protecting energy and mineral resource lands (Figures 5,6 and 8), strategic agricultural **and State forest** lands (Figure 9),...

8. Action 2.2.4

- Modify description of Action to read - Avoid urban and rural residential encroachment into identified agricultural, **forestry** and extractive resource lands when preparing long term settlement strategies

Insert new paragraph 3 to read – **Special care will be needed to ensure that the creation of biodiversity offsets over existing native forests do not incrementally impact the region’s valued timber resources.**

In relation to the protection of the natural environment we note that the draft Plan appears to be perpetuating an ‘old school’ paradigm that biodiversity conservation is best achieved by setting aside land in passively managed conservation reserves.

New thinking recently conveyed by the NSW Biodiversity Legislation Review Panel and the NSW Government's Natural Resources Commission reveals that achieving good conservation outcomes is no longer that simple as threats to biodiversity cannot be constrained by tenure boundaries. On private lands in particular, planners need to look to adopt more integrated and cooperative approaches that go beyond the tradition models (that rely heavily on compartmentalisation and centralised regulatory control). These new approaches will require greater consideration of the human element and the socio-economic implications of strategic land-use decision making.

One of the fundamental constraints for biodiversity conservation management is the lack of credible data to guide land-use decision making. The old adage "if you can't measure it, you can't manage it" is very pertinent. The Plan represents an important opportunity to put in place a system that will reduce the knowledge gaps. Cross tenure forest monitoring system are recognised as the most effective way to track long term environmental performance. Forest monitoring systems are well established in the US and Canada as well as in Victoria and Western Australia. These monitoring systems are now regarded as essential for providing feedback on the state of the forests and the effectiveness of forest management practices. They also facilitate best practice by supporting active and adaptive management.

There are three major threats to biodiversity that have not been given adequate attention within the draft Plan, they are; altered fire regimes, invasive pests and invasive weeds. By failing to consider how these threats should be monitored and managed into the future the draft Plan is ignoring an important aspect of the biodiversity conservation challenge.

With increasing risk of mega-fires, catastrophic losses to biodiversity can be averted through more active management. Ecological thinning of forests which exhibit woody thickening characteristics not only protects them from mega-fires it also improves biodiversity outcomes. The timber industry has a key role to play in ecological thinning as it is best equipped to undertake the task at least cost.

The box below details how the draft Plan may be amended to better incorporate our concerns.

AMENDMENTS PROPOSED UNDER GOAL 3
(proposed text changes shown in bold)

1. GOAL 3 Protect and Connect Natural Environments

- Reword paragraph 1 sentence 1 – avoid the phrase ‘pristine natural areas’ as it is misleading. Suggest the following – Much of Hunter’s **highly valued** natural areas are already conserved...
- Reword Paragraph 8 as follows – As the region continues to support growth in both its rural and resource industries and its urban areas, good planning and design **along with more effective management of natural and introduced hazards, namely, fire, pests and weeds has become more critical.**
- New paragraph 9 – **To protect biodiversity and the other important values within the region’s natural areas the NSW Government understands the importance of a tenure neutral approach. Fire, pests and weeds do not distinguish between protected and unprotected areas. A proactive and holistic approach to the management of these threats will be critical if the region’s highly valued natural areas are to be effectively protected for future generations.**

2. Direction 3.1 Protect the natural environment and biodiversity

- Figure 11: High Environmental Values Map – The label in the key in the key ‘High environmental value’ is somewhat presumptuous and misleading. By retaining this label it puts in question the environmental value of the other land tenures shown on the map. If left unchanged this label could trigger conflict with existing agricultural and private native forestry land use interests. The label ‘High environmental value’ should be changed to something like **‘privately owned native vegetation with recognised environmental values’**.

3. Explanatory note : High Environmental Values Map

- Modify sentence 1 to read – **The areas identified in Figure 11 have important natural features and environmental values which have existing protection under legislation, regulation, policy or intergovernmental agreement.**
- Modify sentence 2 to read – A range of criteria were used to identify and map **privately owned land with recognised environmental values including:..**
- Modify sentence 3 and 4 to read – The data used to **identify privately owned lands with recognised environmental values** is intended to provide a regional-level overview for the purposes of strategic planning. **In preparing this map no**

consideration was given to the socio-economic values of this land. Further consideration of socio-economic values will be required in any land use decision making.

4. Action 3.1.1

- Modify heading to read - Improve the quality of and access to information relation to high environmental values and use this information to avoid, minimise and mitigate the impacts of development on significant **natural** assets.
- Modify paragraph 1 sentence 1 to read - In areas identified with **recognised** environmental values (see Figure 11) and aquatic and marine biodiversity and habitat values, the NSW Government will work with **landholders, forest dependent industry and** councils to protect biodiversity by:
 - **Implementing a cross-tenure monitoring system that will help track the health and performance of the region's forests and the biodiversity they support**
 - **Creating the right regulatory environment and implementing appropriate measures to incentivise the more effective management of biodiversity and other natural resources values.**

5. Action 3.1.2

- Modify paragraph 4 dot point 2 to read - The NSW Government will: provide more options for investing in **conservation outcomes by supporting the mitigation of key threats (e.g. altered fire regimes, invasive pests and weeds) through the application of active and adaptive management practices.**

6. Action 3.1.3

- New final paragraph and dot point to read – The NSW Government will work with councils, landowners **and forest dependent industry to ensure participation in private conservation schemes avoids any unintended socio-economic impacts. This will be done by:...**

Thank you again for the opportunity to submit comment on the draft Plan. We look forward to seeing the incorporation of our feedback within the final Plan.

Yours faithfully



Maree McCaskill
General Manager