

From:
To: [NRC](#)
Subject: Thinning of Brigalow and Nandewar state conservation areas
Date: Sunday, 27 July 2014 11:54:05 PM

My name is Alexander Dudley.

I am an environmental consultant and I have worked as a zoologist, ecologist and environmental educator for over twenty-five years. I have the following comments on the proposal to thin white cypress in Brigalow and Nandewar state conservation areas.

"In pre-European times, it is likely that significant areas of the forests were managed by regular intentional burning by Aboriginal people" This is likely to be true, but given the lack of information on frequency and intensity, how can managing authorities replicate these supposed burning regimes given the massive ecological changes that have occurred in these areas since European settlement- in particular with regards to the changes in native marsupial numbers through competition with stock, rabbits and pigs, and predation by cats and foxes; and the massively changed fuel loadings brought on by the introduction of high-calorific grasses, in particular Coolatai Grass?

On recommendations

2(b) It is absolutely critical that comprehensive fauna and flora surveys be undertaken in these areas to evaluate the impact of any of these management decisions. There is a consensus that white cypress is bad for the ecology but there is very little evidence that this is in fact the case. "Spatial Data technologies" are not enough to determine the impact of thinning operations by any means on biodiversity. On-ground surveys are a critical part of quantifying results.

5 (e) The residues of commercial thinning will be wood. In a natural ecosystem this material would be on the ground, where it would become part of the ecosystem- i.e. part of the carbon cycle, as it is broken down by invertebrates which in turn are preyed on by vertebrates. The removal of timber from the ecosystem equals the removal of nutrients and biomass. If the removal of this timber is for the purposes of burning the results will be an increase in atmospheric CO2. If thinning these ecosystems achieved as per the stated aim, NSW will have lost even more capacity to absorb atmospheric CO2 and our greenhouse gas emissions will increase. I am opposed to any activities that will increase our CO2 emissions as Australia is particularly vulnerable to climate change. I believe that any amendments to the Renewable Energy (electricity) Regulations 2001 to recognise the use of "ecological thinnings residues" (otherwise known as native timber from conservation reserves) is a giant step in the wrong direction- not only in regards to our international moral obligations regarding climate change, but there is a real risk that these areas will be looked upon by governments in terms of their monetary value rather than for their ecological and aesthetic values.

2.3 Grazing- just how does grazing improve the land? How does it improve groundcover? Grazing in fact has been demonstrably shown to destroy groundcover, and the preferential grazing habits of stock will certainly knock out more palatable species before they touch the white cypress- native grasses are especially vulnerable.

Table 1 purports to list "previous or current application" but the bulk of these listed appear to be ongoing studies or anecdotal, the results of which are yet to be assessed by independent bodies. Surely making recommendations prior to the results of such studies and trials being completed is jumping the gun. Until the claims made about the benefits of grazing, thinning and fire can be quantified, making recommendations that involve changing legislation is premature.

From my reading of the document there seems to be no value placed on wood on the ground. There seems to be a premise that wood on the ground that would be left over from such thinning operations would be nothing but a fire hazard, yet any fire expert will tell you it is the material that is thinner than a finger that carries the flames. The importance of woody debris on the ground as cover from predators appears to have been overlooked by the authors of the report.

If thinning operations go ahead under a goods for services arrangement how will that be policed? I see *major* issues with such a program including the following:

- contamination of conservation areas with weeds (such as Coolatai Grass)
- the formation of tracks which will subsequently be used for illegal operation such as wood hooking and hunting
- the potential for the introduction of pathogens such as chytrid fungus and *Phytophthora cinnamoni* on equipment.
- Through economies of scale heavy vehicles would be used in the gathering of the "thinning products" leading to soil compaction and associated erosion issues.

- If the operation runs on a goods for services there is an incentive for contractors to get "more goods" for "less services".

- grazing in areas of conservation areas are likely to impact watercourses and cattle are likely to target native grasses such as kangaroo grass. Rather than controlling weeds, it is just as likely that cattle will introduce them and facilitate their spread.

- Cattle are also likely to target shrubs; a loss of the shrub layer in grassy woodlands is a key threatening process for many threatened woodland birds.

I support the arguments against commercial outcomes from ecological thinning outlined in page 30 of attachment 6.

It does not appear that the rapid spread of invasive grasses has been taken into account in these proposals, especially with regards to their potential impact on fire behaviour and forest structure. The thinning of white cypress will open up the country to these grasses and it will be more difficult to control fires in such an environment than would otherwise be the case. Furthermore any fires that occur when these grasses are present are likely to take out habitat trees as has occurred in the Coolatai district where I live. In fact I firmly believe that Coolatai grass is one of the biggest landscape-scale threats faced in the regions covered by this document precisely because of its impact on fire behaviours.

The whole content of attachment 16 seems to show the true motivation for the proposal- not for any ecological reasons as claimed, but for economic and revenue-raising activities. The proposal to reclassify native vegetation as a renewable energy source (especially at a federal level) sets a dangerous precedent. The fact that the collection of ironbark firewood is listed as part of the "thinning operations" demonstrates that there is a clear danger that there is a wholesale targeting of the shrub layer within these proposed harvesting areas.

Table A16.3 discusses the establishment of a bioenergy plant. If the 18million dollars were spent on a solar plant the annual costs of running would be far, far less, as sunlight is free. The project life would be far longer than 20 years, and once established, would lower the costs of electricity to the local area, which would be an economic benefit.

If this proposal does go ahead the importance of having control sites inside conservation areas when thinning takes place outside conservation areas cannot be understated. There needs to be a rigorous scientific approach over at least a five year period where comparative measures of biodiversity can be made prior to any thinning taking place within conservation areas. This requires comprehensive baseline ecological data be gathered in control and thinned sites- use of satellite imagery alone is far from acceptable.

Kind regards,

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