

## SUBMISSION ON DRAFT REPORT: ACTIVE AND ADAPTIVE CYPRESS MANAGEMENT IN THE BRIGALOW AND NANDEWAR STATE CONSERVATION AREAS.

The NRC, has released a draft report recommending that logging operations be permitted in the Brigalow and Nandewar State Conservation Areas, and that the timber be sold to commercial sawmills.

The draft report makes the following key recommendations:

Implement active management such as:

- Logging (described as ecological thinning) of White Cypress Pine
- grazing, controlled burning and pest control in the State Conservation Areas .

Allow commercial logging activities by seeking cost recovery and cost sharing opportunities to off-set management costs and deliver economic benefits to local industries and communities

Prioritise active management in the Goonoo, Pilliga, Pilliga West and Trinkey State Conservation Areas by developing and implementing management plans.

Review governance arrangements in the State Conservation Area

### **1. Conservation Values of Brigalow and Nandewar State Conservation Areas**

State conservation areas have been set aside for the specific purpose of protecting and conserving significant or representative ecosystems, landforms, natural phenomena or places of cultural significance.

These state conservation areas were specifically excluded from logging and forestry activities in 2005 to protect their natural values. They provide essential habitat for native wildlife in a highly cleared landscape. Opening these important areas to commercial logging would be environmentally irresponsible and deeply unpopular.

The Western Regional Assessment undertook five years of scientific study in the Brigalow and Nandewar forests to identify areas of significant environmental value. Permanent protection as Community Conservation Areas was identified as the best management option after extensive consultation with timber operators, conservation groups, Aboriginal stakeholders, minerals and gas industries, local communities and local government.

Commercial logging, grazing, firewood collection and use of timber/biomass for electricity generation will result in significant degradation of the conservation values of these SCAs.

### **2. Concerns with ecological thinning**

The draft report fails to establish the need for ecological thinning of white cypress pine in any credible scientific manner.

Studies comparing the plant species diversity in forests and woodlands containing white cypress of different densities have found no measurable difference. Instead these studies found that the levels of disturbance from logging and grazing, recent rainfall and landscape features such as, altitude, soil depth and drainage was more responsible for plant diversity irrespective of the white cypress density (can we include a source/reference).

In some instances the habitat provided in dense areas of white cypress pine may provide conditions which favour some plant and animals species over others. In these cases a mosaic of different densities at a local landscape level may be desirable.

A mosaic of different white cypress pine densities has always been present and was noted by the early European explorers. Dense stands can provide cover and heat refugia for plant species such as orchids, and animals such as koala which have been observed to move into these areas during hot extreme weather.

The soil health under dense stands has been found to be good as there is an increased incidence of bryophytes, mosses and other non-vascular plants, which protect the soils structure and aid in water infiltration and retention, when compared to forests where disturbance from grazing and logging has occurred.

Larger individuals white cypress trees provide important habitat for threatened wildlife and reduce the density of pine seedlings in the immediate area. Removing these larger mature trees will increase pine density not reduce it.

Given the lack of clear and certain ecological benefits of ecological thinning in these areas, the interventions proposed by the Natural Resources Commission could, in some instances, exacerbate the situation and create additional, detrimental environmental impacts.

### **3. Alternative management approaches**

Trials should not be undertaken in conservation areas, but instead in the established areas set aside for forestry activities in 2005.

Each of the discrete individual Conservation Areas have unique sets of circumstances which require site specific studies to determine the ecological status of vegetation and the best long term management actions. There are areas in close proximity to the State Conservation Areas that would be suitable for trials of proposed commercial logging/grazing/firewood harvesting. Trials in these areas are unlikely to require changes to legislation.

A carefully implemented mosaic of low intensity prescribed burns applied especially following periods of high rainfall when white cypress pine recruitment is high is an alternative to commercial logging. This should be done according to state fire thresholds adjusted for local species requirements and conditions where known.

### **4. Concerns with proposals for commercial logging:**

The Government has used the NRC to develop a report based on 'pseudo-science' to justify its main agenda - commercial logging of state conservation areas.

It is no co-incidence that the four priority areas targeted for the commercial logging trial are the largest Conservation Areas and contain the good stands of mature white cypress. These areas are high in biodiversity and support large populations of threatened woodland fauna and flora.

Commercial logging will target the larger mature white cypress logs to gain more return on the dollar and reduce the basal area of pine in target forests.

### **5. Taxpayers have already paid the industry for these conservation areas**

In 2005 when the Brigalow and Nandewar Conservation areas were declared, the timber and logging industry received a multi-million dollar pay out as compensation. To open these areas for logging now isn't just bad for nature, it is double dipping on the taxpayers' dime.

### **6. Further taxpayer subsidies are proposed**

The draft report recommends that taxpayers subsidise the logging of four state conservation areas in the Brigalow-Nandewar Area, just north of Coonabarabran. The subsidy ranges from \$575 per hectare for heavy logging to \$40 per hectare for low levels of logging under a scheme where the larger white cypress pine trees are proposed to be given away.

The new taxpayer subsidy proposals for logging in state conservation areas are practicably unworkable. The taxpayer subsidy of logging (i.e. 'thinning' of cypress pines) in state conservation area reserves is intended to prevent the proposal becoming uncontrolled logging operation. The subsidised scheme is uneconomic and its nature makes it highly likely that environmental damage will be caused through cost cutting measures.

Additional costs in terms of ecological damage and scenery degraded, as well as pest species invasion, make the proposal totally inappropriate for a conservation area.

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