



## Australasian Native Orchid Society Inc.

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Established 1963

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Natural Resources Commission  
GPO Box 4206  
Sydney NSW 2001

By Email: [nrc@nrc.nsw.gov.au](mailto:nrc@nrc.nsw.gov.au)

Dear Sir

### **SUBMISSION TO PROPOSAL BY NATURAL RESOURCES COMMISSION TO LOG IN THE BRIGALOW AND NANDEWAR STATE CONSERVATION AREAS**

The Australasian Native Orchid Society Inc. (ANOS Inc) has been made aware of a draft report that recommends that logging operations be permitted in the Brigalow and Nandewar State Conservation Areas and that the timber be sold to commercial sawmills.

ANOS do not support this proposal and consider it a significant risk to our native orchids (and other flora and fauna) for a number of reasons outlined below.

#### **1. The proposal is inconsistent with the principles of a State Conservation Area and sets a dangerous precedent for commercial exploitation of conservation areas.**

State Conservation Areas have been set aside to protect and conserve significant or representative ecosystems, landforms, natural phenomena, or places of cultural significance.

In the case at hand, an assessment process was initiated by the NSW Government in 2000, and included a scientific study of the subject area (called the Western Regional Assessment) to identify forests of significant environmental value. As a part of this there was extensive consultation with timber operators, conservation groups, Aboriginal stakeholders, minerals and gas industries, local communities and local government.

In 2005 following the assessment process a decision was made to permanently protect some land as State Conservation Areas (as part of the Brigalow and Nandewar Community Conservation Area). Other areas were classified as national parks, Aboriginal areas or state forests presumably to address specific characteristics or values of the respective sites.

State Conservation Areas were specifically excluded from logging and grazing activities to protect their natural values. They provide essential habitat for native flora and fauna in a highly modified and cleared landscape. Opening these important areas to commercial logging and grazing would cause further significant environmental damage and degrade their conservation value.

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

Opening these areas up for commercial purposes sets a dangerous precedent for the potential opening up of other areas of the national parks estate.



## **2. Commercial logging should not be allowed in the national parks estate.**

Commercial logging seeking cost recovery and cost sharing opportunities should not be suggested under the guise of an ecological thinning trial. Given the earlier work that has been undertaken and accepted to establish the ecological values of these areas it is somewhat surprising that such a proposal as logging should even be considered for this sensitive area.

It is noted that the terms of reference given by then Premier Barry O'Farrell to the Natural Resources Commission, included socio-economic considerations.

It is also notable that the four priority areas targeted for the commercial logging trial are the largest conservation areas and contain the best stands of mature white cypress. These areas are high in biodiversity and support large populations of threatened woodland fauna and flora.

## **3. NSW taxpayers paid \$51 million in 2005 for these areas to be protected.**

NSW taxpayers paid \$51 million in restructuring relief in 2005 for these areas, to compensate for the loss of areas now protected from logging and grazing. This would now seem like 'double dipping' and an affront to taxpayers who have already provided significant economic support to these areas.

## **4. Commercial logging is likely to be illegal so the NRC is recommending changes to law to make it possible.**

The report recommends changing conservation legislation to address existing rules that prohibit logging for commercial purposes.

Profit must not drive change to conservation law. There is an existing review of conservation legislation under way, and passing an ad hoc amendment to allow commercial logging undermines that process. Any law changes should be a considered and balanced response to a recognised significant requirement or situation.

## **5. The alleged benefits of ecological thinning are questionable.**

The scientific "evidence" used to justify the practice is hotly disputed and should be made public as the first step in a more thorough and accepted investigation prior to any recommendation.

There is an established process through the use of Environmental Assessment processes (EIS). We are unaware of any such process having occurred in this instance.

The draft report fails to credibly establish the scientific need for ecological thinning of white cypress pine. Areas of dense white cypress pine provide conditions vital for the survival of several native plant and animal species. A mosaic of different white cypress pine densities at the landscape scale is needed to conserve the full range of biodiversity in these landscapes.

A mosaic of different white cypress pine densities has always been present and was noted by early European explorers. Dense cypress pine stands provide the cover needed for plant species such as orchids and heat refuges for animals which are known to use these areas during extreme heat events.



The soil health under dense stands of cypress is maintained by an increased incidence of bryophytes, mosses and other non-vascular plants, which protect soil structure and aid water infiltration and retention, when compared to forests where disturbance from grazing and logging has occurred.

Larger individual 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.

The NRC has provided no evidence that logging/grazing/firewood harvesting will provide ecological benefits or maintain conservation values. Given the lack of clear and certain ecological benefits of ecological thinning in these areas, the interventions proposed could very well lead to reduced biodiversity.

Heavy machinery which would be required to be used during logging breaks down soil structure and promotes wind and water erosion.

Our particular interest is the protection of native orchid species in the region, many of which are terrestrial and clearly disruption to the ecosystem due to loss of habitat, soil destruction and erosion due to heavy machinery and different water movement over the land is going to have a catastrophic impact on the orchids' capacity for survival.

#### **6. The reserves in the CCA should be brought under the NPW Act and the BNCCA Act 2005 repealed**

Proper protection should be afforded to these reserves. There is sufficient documentation to support this with the previous reports being undertaken by NSW government and that the Brigalow has been identified by the federal government as one of Australia's 15 national biodiversity hotspots. It is vital this area is protected and treated with suitable protections.

In summary, ANOS do not support this proposal and seek adequate protection for this biologically significant area.

Yours sincerely

Anne-Maree Mitford  
Conservation Officer, ANOS Inc