

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

This submission has been prepared and written by Alan W. Stephenson, Conservation Director for the Australian Orchid Council (AOC).

I cannot conceive of a more contradictory exercise than to consider any form of commercial activity within an area listed as a State Conservation Area (SCA) and to attempt to recognise the action as ecological thinning is an affront to the establishment of such areas.

State Conservation Areas were a natural progression from the previous State Recreation Areas, as many were previously titled. Regardless of the quantity or quality of existing timber resources within these areas they should not be seen to be of financial benefit to any private operator and there are numerous points which should be made in regard to the proposal.

State Conservation Areas were established to protect and conserve significant ecosystems, landforms and places of cultural significance for a range of people. These initiatives followed a scientific study conducted in 2000 to identify these values which was known as the Western Regional Assessment. As part of this assessment, extensive consultation was undertaken with conservation groups, Aboriginal stakeholders, local communities, local government and timber, minerals and gas industries.

Following these consultations a decision was made to permanently protect some land as State Conservation Areas. These are the areas known as the Brigalow and Nandewar Community Conservation Areas. However it appears the term "conservation" has been overlooked. This line of thinking must be reversed and areas listed as SCA's must be retained for the purpose for which the term SCA was introduced which was to protect particular natural values, some of which may only apply to a specific district within NSW. Essential habitat for wildlife and native flora must not be destroyed by logging, so-called environmental burning or grazing, especially when such areas have not been subject to any specific environmental assessment by a suitably trained and recognised surveyor.

One significant point is the intention to not only log but to allow grazing and so-called controlled burning, both of which will rapidly destroy existing environmental values. Cost sharing or cost recovery in favour of commercial interests of publicly owned forests should not be the consideration of any government.

A proposal such as this sets a dangerous precedent and provides to other commercial interests, an expectation of using public and allegedly conservation worthy land for their benefit, a practice which must cease before it is allowed to become a normal activity.

This is an openly political decision to permit commercial logging in a public facility such as any area of the national parks estate and I believe is a decision which should be the preserve of a more formal body such as the Office of Environment and Heritage in consultation with the Director General of National Parks. I have witnessed such actions some years ago on the NSW South Coast where an area of then State Forest was promised to the local population as a National Park. Only concerted action by a determined group of citizens from the Bendalong area saw the area become the Greater Conjola National Park. This action thwarted logging operations designed to destroy the area to such an extent it would be seen as unworthy of national park status.

With personal knowledge of previous experiences of formally unprotected forest areas, I feel the only way to protect these SCA's is to have them placed under the control and management of the NPWS. This, I expect will afford them protection from any logging proposal.

Taxpayers of this state contributed \$51 million in restructuring relief as compensation for the loss of these areas to logging and grazing and if this proposal becomes a reality this money will be recognised as simply a bonfire in the name of private influence which obviously cares little for the natural environment. I should ask if the proposed logging is legal in an SCA or has the government agreed to bypass the threat to all SCA's? A second level of compensation must not be allowed to become a reality. With this possibility the question must be asked if commercial logging is in fact a legal process and a change in law to that extent, must also not become a consideration.

I contend there are no benefits to so-called ecological thinning and insist whatever "scientific evidence" used to justify this dubious practice be made public. I further ask if any Environmental Assessment has been undertaken to determine the specific environmental values of these SCA's. If an EIS has been conducted, the public who actually own these SCA's, should have the opportunity to view and comment on any work completed. My particular concerns relate to any orchid species and especially terrestrial species which may occur with the SCA's. An EIS would be the usual procedure prior to a development, except in the case of a Private Native Forestry operation for which regrettably there are no restrictions. If an EIS has been conducted, what method was used, who conducted the EIS, what were (if any) the target species and over what time frame was the EIS undertaken? If an EIS was conducted and the Random Meander Method used then I would consider such an EIS to be completely inadequate as this method is used as a means not to locate endangered orchid species.

Other flora and fauna species will also be placed under threat and Koalas should be just one of many considerations as they are under threat in several other developments or proposed developments. One of which is in the Byron Bay district via a residential development and the other from the Pacific Highway improvement between Ballina and Woolgoolga. Regardless of which flora or fauna species or population is affected, none of them should be

treated as expendable in part or as a whole. Koala numbers in this area have been reported as 15,000 and either thinning, burning or logging their habitat will severely impact on their chances of survival as a viable population.

I would also like to express my vehement opposition to any form of commercial operation such as firewood collection and the use of timber to be used for the production of electricity (Biomass) as this must be the greatest environmental contradiction of all. From this retrograde step it is only another small step to consideration of commercial logging or grazing operations in national parks, a move destined to cause extreme conflict in NSW as well as extreme degradation to more publically owned land in NSW. These considerations will forever destroy the range of biodiversity currently existing within these SCA's and national parks if the situation is allowed to deteriorate to that extent.

Machinery used to thin or log these areas will certainly result in destruction of soil structure with the removal of mosses, bryophytes and other vascular plants. This will occur whether the machinery used has caterpillar treads or rubber tyres. Weather conditions will also contribute to these disturbances regardless of wet or dry conditions. This in turn will lead to erosion and an uneven dispersal of water. This is a feature of critical importance where terrestrial orchids are concerned as they require stable conditions where excess water is not directed to or normal water is not directed from their general habitat. Add to this the damage from non-native hard hoofed grazing stock and environmental degradation is assured.

Areas such as these SCA's and other natural areas cannot be improved with the interference of humans and with over 200 years of habitat destruction across Australia this lesson should be well learned. Protection from fire should only be necessary to prevent an impact to a permanent community and this can further be avoided by proper thought before such a community is established.

The NRC has produced no data regarding environmental advantages if this short sighted commercial consideration is to become a reality. Indeed the opposite will prove to be the certain result.

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