

SUBMISSION

Draft Report

Active and adaptive cypress management in the
Brigalow and Nandewar State Conservation Areas

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Introduction

Central West Environment Council (CWEC) submitted a detailed submission to the first stage of the assessment process for the management of white cypress pine in State Conservation Areas (SCAs) in the Brigalow Belt South (BBS) and Nandewar bioregions.

As already noted CWEC participated in the development of the *Brigalow and Nandewar Community Conservation Area Agreement 2009* where there was bipartisan support for non-commercial ecological thinning.

CWEC wishes to raise significant concern that the Natural Resources Commission (NRC) has recommended to overturn this agreement that was made through rigorous negotiations across three Community Conservation Area Advisory Committees. The committees included representatives of the community and industry, including the timber industry.

CWEC is concerned that the NRC has opened itself to a perception of political interference that threatens its standing as an independent body.

CWEC is of the opinion that the recommendations made in the draft report '*Active and adaptive cypress management in the Brigalow and Nandewar State Conservation Areas*' ('the report') will not achieve measurable ecological improvements within these protected areas

Key Issues:

1. Introduction of commercial logging and grazing operations in SCAs

CWEC does not support the recommendations in the report to reintroduced commercial logging operations and grazing into the areas protected as SCAs in 2005. CWEC does not agree that commercial exploitation of native woodlands will achieve improved ecological outcomes.

While Recommendation 1 does not specifically identified commercial logging as a form of ecological thinning, Recommendations 4 (a), 4 (b), 5 (c), 5 (d) and 5 (e) facilitate this outcome.

The report identifies that '*The thinning regime would need to include a certain amount of larger trees (production volume) to make the activity commercially attractive*' (p115). It is difficult to understand how the harvesting of saw logs will meet the principles of ecological thinning as outlined in Table 24.

The report refers to ecological thinning activities currently being trialled in the protected red gum areas on the Murray River. There has been no

substantial results from these pilot areas on which to base a clear understanding of the ecological outcomes.

CWEC does not support the proposed introduction of industrial scale logging operations within SCAs in NSW. The estimated availability of 1,000m³ – 14,000m³ per annum saw logs and 1,800m³ – 23,000m³ per annum landscaping products over a 7 year period is not supported by any clear discussion of the ecological benefits derived from this level of commercial harvesting.

The report also does not identify how this volume of timber can be removed under the principles outlined in Table 24.

The report also refers to studies that question the effectiveness of ecological thinning for achieving improved biological outcomes:

Cohn et al (2012) - in parts of western NSW thinning may not necessarily encourage increased growth and regeneration of eucalypts – response of white cypress thinning is not uniform across the landscape. (p 67)

In relation to grazing, the report acknowledges that little is known about the benefits of grazing in the Brigalow and Nandewar SCAs:

'A lack of comprehensive monitoring of – and data on – grazing impacts on white cypress pine forests has meant it is not possible to assess how livestock grazing affects conservation values or fire risk.' (p97)

CWEC does not believe that the reintroduction of commercial activities within SCAs will make it possible to manage the proposed outcome that

'opportunities for cost recovery or other commercial benefits must be a secondary consideration to the promotion of improved ecological, cultural and recreational outcomes'. (p 15)

2. The use of fire as key active and adaptive management tool

The report identifies that prescribed burning activities are the most cost effective management of dense cypress regrowth, however, this active and adaptive management tool is not given any recognition in the key recommendations.

The report notes that there was significant discussion and feedback on fire management in the first round of submissions.

CWEC is concerned that this management tool has not been given the emphasis it deserves in the recommendations of the report.

It is noted that Whip et al (2012) identify fire as a disturbance regime that can control dense stands of young cypress. (p66).

CWEC also notes that important studies on fire management for ecological outcomes have not been referred to in the NRC assessment eg

- CSIRO Wildlife Research Bradstock et al (2005) '*Which mosaic, A landscape ecological approach for evaluating interactions between fire regimes, habitat and animals*'.
- SEQ Fire and Biodiversity Consortium, Watson.P (2001) '*The role and use of fire for biodiversity conservation in South-East Queensland: Fire management guidelines derived from ecological research*'

3. Proposed amendments to legislation

CWEC strongly opposes Recommendations 5 (c), 5 (d) and 5 (e). The facilitation of commercial activities in SCAs through legislative change is setting a precedent for the management of all protected areas in NSW.

CWEC is of the opinion that the recommendations in the report are not consistent with the objects of the *National Parks and Wildlife Act 1974* as required under the Terms of Reference for the NRC assessment.

The specific emphasis on the use of native timber for electricity generation is unsustainable and irresponsible.

4. Best use of NSW taxpayers money

While CWEC supports the suggested improvements for adaptive management principles to be included in Plans of Management for SCAs, the concept of a new process to develop a separate Adaptive Management Plan for the region with independent review is unnecessary.

The National Parks and Wildlife Service (NPWS) Landforms and Rehabilitation Team has the expertise to provide the necessary adaptive management processes within existing Plans of Management.

The resourcing of the completion of Plans of Management for the SCA areas is the key issue. This can be overcome through improved resourcing of the NPWS planning procedures.

The introduction of a new Adaptive Management Plan that requires the oversight, monitoring and evaluation of commercial activities is inappropriate use of taxpayer's money.

The native forestry industry has always been subsidized by the taxpayer to the detriment of biodiversity and ecological services provided by natural areas.

CWEC recommends that the NRC use economic models developed to provide a value to the ecological services outlined in Table 3 (p22). The regulating services, cultural services and supporting services provide value to the people of NSW. This has not been included in the report.

The emphasis on the economic value of the timber resource does not calculate the loss of other ecological services.

However, the report does recognize that timber harvesting and grazing activities would conflict with recreational opportunities (p 128) and that the timber industry is insignificant within the regional economy (p 130).

The suggestion that taxpayers should once again subsidise these commercial activities by 60% to 70% of the costs of management is unacceptable.

CWEC is of the opinion that regional jobs created to actively and adaptively manage ecological outcomes in the Brigalow and Nandewar SCAs should be given the same social weight as public investment in education and health jobs.

Conclusion

CWEC is disappointed with the outcomes and recommendations provided in the NRC report.

The proposal to overturn a negotiated agreement developed in good faith by community, industry and Government stakeholders is unacceptable.

CWEC recommends that the NRC review the basis of the 20 year wood supply agreement made between the previous NSW Government and the Gunnedah timber mill. The outcome should be a buyout of the licences, as has just occurred with the north coast NSW timber industry.