

8 August 2014

Natural Resources Commission  
GPO Box 4206,  
Sydney, NSW, 2001

By email: nrc@nrc.nsw.gov.au

Dear Commission,

**Draft Report - Active and adaptive management of cypress forests in the  
Brigalow and Nandewar State Conservation Areas**

The EDO NSW as a community legal centre specialising in public interest environmental law, welcomes the opportunity to provide comment on the *Draft Report - Active and adaptive management of cypress forests in the Brigalow and Nandewar State Conservation Areas (Draft Report)*.

EDO NSW has concerns that the proposed management action will not maintain or improve environmental outcomes as required by the *Native Vegetation Act 2003*, for the reasons set out below.

*Justification for the proposed action*

As a preliminary observation, EDO NSW notes that environmental need for “ecological thinning” has been insufficiently established. The NRC concludes that “30 percent of the area (approximately 57,000 hectares) contains large areas of relatively dense white cypress pine that are potentially impacting on environmental values”. The NRC considers that any area of white cypress pine larger than 1ha with greater than 21% canopy cover should be considered relatively dense and likely to be negatively impacting on environmental values. The Draft Report also models thinning in areas with only 11% canopy cover. Expert advice provided to EDO NSW is that white box naturally forms monocultures under some environmental conditions so should not be inherently considered negative. The suggestion that management intervention should apply to areas with only 11% canopy cover is highly inappropriate. The assumption in the Draft Report that if management intervention is not undertaken that white cypress pine will spread further and become problematic is speculative and is not an appropriate justification for the proposed action.

*Disparity between ecological and commercial considerations, purposes and outcomes*

Despite establishing an adaptive management framework designed to set the objectives and the parameters of any thinning, there appears to be a significant risk that “ecological thinning” will be inappropriately influenced by commercial considerations. There appears to be a fundamental conflict between the type of thinning that in some circumstances may be desirable to achieve environmental goals, i.e. the removal of small multiple stems, and the type of thinning required for profitable commercial logging, i.e. saw logs or firewood. This concern is enhanced by the observation from the NRC that “*Land managers could offset the*

*direct costs of ecological thinning more fully by adjusting the ratio of production to non-production logs to ensure a cost-neutral outcome. This could provide the necessary commercial incentive to engage a party for thinning services, particularly where smaller trees are to be thinned'. If such a recommendation was followed, clearing would no longer be primarily for an ecological purpose.*

#### *Appropriate program management*

The document also appears to underestimate the cost of an appropriate adaptive management regime. The program has assumed a seven year planning and implementation cycle. This is wholly inadequate to monitor the response of white cypress pine to any management approaches. Proper baseline studies will need to be conducted prior to any activity taking place, control sites and active management sites will need to be monitored and the long-term impact of management changes will need to be assessed. Given that the work is proposed in a conservation area, any "ecological thinning" must be supervised by qualified NPWS staff. Currently the document recommends only occasional audits. This is highly inadequate in a high conservation value area.

#### *Impacts of logging*

The impacts that are predicted to arise from logging are underestimated. The document makes no mention of: risks of death to individual, potentially threatened, fauna species; impacts arising from soil compaction; the potential to introduce weed species; and the reduction of habitat caused by removal of any dense canopy pines.<sup>1</sup>

#### *Grazing*

EDO NSW is also concerned about proposals relating to the use of grazing. Cattle are not known to preferentially consume cypress pine so it is questionable whether this is an appropriate management technique. Appropriately using cattle for weed control requires intensive management, including small paddocks with associated watering points. This type of management is highly inappropriate in a conservation area as the introduction of fencing will require the removal of native vegetation and the provision of watering points will attract feral animals. Grazing has been suggested for warming months but this is in direct conflict with conservation requirements as these are the months when native ground covers set seed. Therefore there is a high risk that recovery of conservation values of the area will be negatively impacted by such a grazing regime.

#### *Burning of native forest biomass*

EDO NSW does not support the proposal that offcuts from thinning could be used for electricity generation. Permitting burning of native forest wood waste removes carbon sinks, encourages native logging, impacts on biodiversity and contributes to particulate pollution.<sup>2</sup>

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<sup>1</sup> For example, many orchid and lichen species significantly benefit from the lack of competition engendered by dense stands of white cypress pine.

<sup>2</sup> See our previous submission on using forestry "waste" for energy generation, available at: <http://d3n8a8pro7vhmx.cloudfront.net/edonsw/pages/337/attachments/original/1380680287/130506DraftEnergyfromWastePolicy.pdf?1380680287>.

Yours sincerely,  
**EDO NSW**

A handwritten signature in black ink, appearing to read 'R Walmsley', written in a cursive style.

Rachel Walmsley  
Policy Director