



LANDMARK
Ecological Services Pty Ltd

SUBMISSION ON DRAFT REPORT BY NATURAL RESOURCES COMMISSION: ACTIVE AND ADAPTIVE CYPRESS MANAGEMENT IN THE BRIGALOW AND NANDEWAR STATE CONSERVATION AREAS

I wish to strongly object to the proposal by the NSW Natural Resources Commission (NRC) to allow logging (termed "active and adaptive Cypress management") and grazing in State Conservation Areas (SCAs) of the Brigalow Belt South and Nandewar Bioregions.

These areas contain examples of some of the most depleted and poorly conserved ecosystems in the State and reintroducing logging and grazing would destroy and degrade the very elements that the SCAs were created to conserve. Their gazettal by the former Carr Labor Government, following years of comprehensive, detailed surveys, recognised these values and the risks that forestry and grazing activities posed.

The SCAs are strongholds for a number of vulnerable and endangered species (listed under the NSW *Threatened Species Conservation (TSC) Act 1995*) and core populations of these species would be directly impacted by the forestry and grazing activities proposed. The Pilliga forests, which contain a number of the SCAs at issue, are recognised as a National Biodiversity Hotspot and globally significant Important Bird Area. All SCAs provide essential stepping stone habitat in the East Australian Bird Migration System.

The rationale provided for the imposition of forestry and grazing management is flawed and lacks supporting scientific evidence, and the proposal appears to represent an attempt to resurrect the type of resource exploitation project that formed the basis for the discredited and rejected charcoal plant from the previous decade.

Ecosystem processes and the implications of renewed disturbance regimes

The semi-arid ecosystems represented in the Brigalow and Nandewar SCAs are characterised by relatively low rates of net primary production (compared to the forests and woodlands of eastern NSW) and consequently take much longer to recover from disturbance that removes and destroys the woody tissue sequestered by trees and shrubs and results in essential food and shelter resources for animals taking longer to reach usable and sustainable levels. For example, stands of trees produce smaller volumes of food over longer time periods, resulting in lower densities of

herbivorous and nectarivorous vertebrate species, and tree hollows take much longer to develop to a size where they are suitable for use by hollow-dependent species. Reintroduction of logging and grazing to these ecosystems, that are still recovering from decades of disturbance from such *regimes*, will compound the problems of loss and degradation and accelerate localised extinctions.

Past clearing of the landscapes containing the SCAs has resulted in most now existing as remnants in a sea of agriculture, continuing to suffer losses due to isolation and edge effects and exhibiting increased sensitivity to pressure applied from within. The logging and grazing activities now being proposed will exacerbate these perturbations and in combination with impacts such as Climate Change, are likely to lead to ecosystem collapse.

Key Threatened (TSC Act) species

The Pilliga SCAs contain a high proportion of the largest population of the Barking Owl in NSW, a species that has declined drastically elsewhere throughout its range in NSW and the proposal would threaten its nest and roost sites and the maintenance of adequate population levels of its prey species.

The Pilliga SCAs also support populations of the Pilliga Mouse, which is endemic to the area and part of the only viable population of the Black-striped Wallaby in the State. Disturbance from forestry activities and grazing would detrimentally affect these populations through fragmentation of habitat, loss of crucial habitat attributes, creation of barriers to movement and facilitation of access for introduced predators and herbivores, particularly the Red Fox, Feral Pig and Feral Goat.

The north western Pilliga SCAs provide a refuge for the rapidly dwindling Koala population in the Pilliga forests and other Threatened species maintaining remnant populations across this area include the Pale-headed Snake and Eastern Pygmy-possum. Again, these would be adversely affected through loss of foraging and breeding habitat and in some cases predation resulting from the proposal.

The SCAs overall provide important habitat for a suite of declining woodland bird species and in the cases of the Turquoise Parrot, Black-chinned Honeyeater, Grey-crowned Babbler and Diamond Firetail, probably conserve a significant proportion of their core habitat. Breeding and foraging habitat for these species would be lost as a result of the forestry and grazing activities proposed.

Microchiropteran bat species such as the South-eastern Long-eared Bat and Little Pied Bat would lose foraging habitat and maternity sites, and foraging habitat of the Large-eared Pied Bat and Eastern Cave Bat would also be lost or degraded.

Flawed arguments in relation to management issues

The draft report purports to provide a solution to management issues supposedly detrimentally affecting biodiversity values in the Brigalow and Nandewar SCAs. However, it provides no scientific evidence to demonstrate how the reintroduction of logging and grazing incorporating controlled burning and pest control will prove effective for biodiversity conservation, apart from the dubious claim that logging may generate some royalties that could be used for the implementation of management plans. However, logging in the past was only marginally profitable at best and is unlikely to generate any useful amount for this purpose if reinstated.

This claim also begs the question as to why such management was not implemented in the past in areas of State Forest that were supposedly being managed for multiple use.

No evidence is presented to support the proposition that dense Cypress regeneration is detrimental to biodiversity conservation and a "trial logging operation" should not be undertaken in areas reserved for conservation. Rather, if such a trial is necessary it should be implemented in areas of production forest where the results are likely to be most beneficial.

If forestry management in the Brigalow and Nandewar Bioregions requires action to protect and maintain timber supplies, then the Government should remove the threat posed to existing State Forests by activities such as coal mining and coal seam gas extraction. The latter also make the continued protection of the remnant ecosystems within the SCAs even more important.

I recommend that the proposal by the NRC be rejected as it presents no credible scientific evidence to justify its position , ignores potential impacts on core biodiversity values and would result in the destruction of these values together with setting the highly undesirable precedent of allowing resource exploitation from designated areas of the State's reserve system.



David Milledge

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