

From:  
To: NRC  
Subject: North West SCA - far too precious to plunder - NRC draft report fails  
Date: Sunday, 10 August 2014 11:07:06 AM

I strongly object to the the NRC report:  
**"Active and adaptive management of cypress forests in the Brigalow and Nandewar State Conservation Areas"**  
I also strongly object to the recommendations

The draft report makes the following key recommendations:

- Implement active management such as ecological thinning and targeted grazing in combination with controlled burning and pest control in the State Conservation Areas, to maintain and improve environmental outcomes.
- Where appropriate, seek cost recovery and cost sharing opportunities to off-set management costs and deliver benefits to local industries and communities.

The draft report provides no substantive supportive scientific evidence that the proposal to log the gazetted SCAs could benefit the ecosystems currently protected in their various stages of recovery and providing irreplaceable habitat for biodiversity in an overcleared landscape.

Any "ecological thinning" trials must be done in existing production forests. There is absolutely no reason whatsoever to make any moves towards restorative adaptive management forestry in the existing conservation reserves. From an environmental point of view, it is outrageous to even suggest it. It is a blatant resource exploitation proposal.

Interventions which are carried out for the primary purpose of achieving environmental benefits and are consistent with the principles of ecologically sustainable development comply with the *National Parks and Wildlife Act 1974* (NSW).

In undertaking active management to enhance environmental outcomes, the NSW Government should seek secondary commercial benefits, as appropriate, to off-set costs, improve long-term sustainability of the program and deliver social and economic benefits. The NRC has obtained legal advice that by-products generated from active management, such as ecological thinning, could be used for secondary commercial purposes, provided interventions have been carried out for the primary purpose of delivering positive environmental outcomes.

It is clear that the logging, regardless of what it is called, is not consistent with the principles of ecologically sustainable development. The precautionary principle is not upheld with this proposal. This is clearly acknowledged in this following extract from Table 8 in the draft report

**Policy makers and managers have incomplete knowledge of the management context and system dynamics (uncertainty is high) but can manipulate through interventions (controllability is high) without causing irreversible damage (risk is low)**



The full extent of environmental benefit from a range of proposed additional active management options in the State Conservation Areas is uncertain (see **Chapter 9**).

While the physiological and ecosystem response of white cypress pine under forestry is relatively well known, optimal treatments and prescriptions for conservation outcomes need further investigation.

The necessary condition for adaptive management of proceeding if risk of irreversible damage is low is very relevant (tick) BUT this condition has not been met ! At first blush the tick in the table is misleading. Adaptive management involving impact over many hectares just cannot be accommodated.

The risk of irreversible damage is **high**. The ecosystem restoration process that these precious remnants of woodland and forests in the overcleared agricultural landscapes are already undergoing is a time consuming process in the climate and conditions of the North West. The habitat values of the State Conservation Areas

Also it would be an arrogance, to say the least, to assume that there is high controllability of the 'intervention' - the uncertain future of climate change and extreme events occurring more frequently is our bottom line. The chance of droughts and flooding rains, fires and locusts, unknown stochastic events is high.

The NRC appears presumptuous. It is unclear just how much targetted consultation with the appropriate expertise has occurred, and what the capacity that OEH would actually have, let alone what actual potential really exists for universities and research institutions to be involved. Again I think the tick below is misleading. I am relieved that at least there is an admitted question mark regarding stakeholder support.

<p><b>Policy makers and managers have the capacity to, monitor and evaluate and a strong culture to learn, reflect and adjust policy and management decisions in a timely manner</b></p>	<p>✓ The Office of Environment and Heritage has scientific and technical capacity and experience, including adaptive management experience within the National Parks and Wildlife Service Landforms and Rehabilitation Team.</p> <p>The region also has connections to universities and research institutions to support collaborative monitoring, evaluation, research and reporting processes.</p>
<p><b>Policy makers and managers have sufficient funding and resources and the political and stakeholder support needed to implement adaptive management</b></p>	<p>✓ Adaptive management has previously been funded and implemented in the river red gum forests (thinning trial) and south-western cypress forests (grazing trial). The state-wide National Parks and Wildlife Service Landforms and Rehabilitation Team includes adaptive management expertise.</p> <p>? Likely stakeholder support will be evaluated after further consultation.</p>

Any attempt to change legislation to enable this proposal would invite community uproar.

I ask the NRC to grapple with the fact that Natural Resources and Ecological Sustainable Development are irrevocably intertwined.

Leave the State Conservation Areas alone, logging them does not conserve biodiversity and it is not fair to our future generations either.

Furthermore, NRC, the people of NSW will not accept the logging of native forest as fuel for a furnace to produce electricity - it is double double speak to try to sell the idea of 'ecological thinning' for 'renewable energy production'. It is destined to fail.

Yours sincerely,  
 Marg Mclean  
 FalBrook Wildlife Refuge