

Submission to draft report: active and adaptive cypress management in the Brigalow and Nandewar state conservation areas.

My submission is against the proposals as they set a dangerous precedent for commercial exploitation of conservation areas.

The grounds for my submission are:

- State conservation areas have been set aside to protect and conserve significant or representative ecosystems, landforms, natural phenomena, or places of cultural significance.
- In 2000 the NSW Government initiated a year scientific study of the area (called the Western Regional Assessment) to identify forests of significant environmental value. There was also extensive consultation with timber operators, conservation groups, Aboriginal stakeholders, minerals and gas industries, local communities and local government.
- At the end of this assessment in 2005 it was decided to permanently protect some land as State Conservation Areas (as part of the Brigalow and Nandewar Community Conservation Area). Other areas were classified as national parks, Aboriginal areas, or state forests.
- State Conservation Areas were specifically excluded from logging and grazing activities to protect their natural values. They provide essential habitat for native wildlife in a highly modified and cleared landscape. Opening these important areas to commercial logging and grazing would cause significant environmental damage and degrade their conservation value.
- Commercial logging, grazing, firewood collection and use of timber/biomass for electricity generation will result in significant degradation of the conservation values of these State Conservation Areas.
- Opening these areas up for **commercial** purposes sets a dangerous precedent, and could be the thin end of the wedge to opening up other areas of the national parks estate.

2. Commercial logging should not be allowed on the national parks estate in any form

- Commercial logging is just that, not an ecological thinning trial. This is a highly political recommendation that should not have been made by a supposedly independent organisation.
- This report was commissioned with the intention of allowing commercial logging of state conservation areas, which is why socio-economic considerations were included in the terms of reference given by then Premier Barry O'Farrell to the Natural Resources Commission.
- It is no coincidence that the four priority areas targeted for the commercial logging trial are the largest conservation areas and contain the best stands of mature white cypress. These areas are high in biodiversity and support large populations of threatened woodland fauna and flora.

3. NSW taxpayers paid \$51 million in 2005 for these areas to be protected from logging and grazing

- In 2005 when the Brigalow and Nandewar conservation areas were declared, the timber and logging industry received a multi-million dollar pay-out as compensation. To open these areas for logging now isn't just bad for nature, it is double dipping on an asset already paid for by taxpayers.

4. Commercial logging is likely to be illegal - profits must not drive changes to conservation law

- The report recommends changing conservation legislation to avoid falling foul of rules that prohibit logging for commercial purposes.
- This is a bad reason to change the law. There is an existing review of conservation legislation under way, and passing an ad hoc amendment to allow commercial logging undermines that process.

5. The science used to justify ecological thinning is hotly disputed

- The draft report fails to credibly establish the scientific need for ecological thinning of white cypress pine. The Brigalow has been identified by the federal government as one of Australia's 15 national biodiversity hotspots. It is vital this area is protected and treated with respect.
- Areas of dense white cypress pine provide conditions vital for the survival of several native plant and animal species. A mosaic of different white cypress pine densities at the landscape scale is needed to conserve the full range of biodiversity in these landscapes.
- A mosaic of different white cypress pine densities has always been present and was noted by the early European explorers. Dense cypress pine stands provide the cover needed for plant species such as orchids, heat refuges for animals such as the koala, which are known to use these areas during extreme heat events. There are reported to be 15,000 koalas in the area.
- The soil health under dense stands of cypress is maintained by an increased incidence of bryophytes, mosses and other non-vascular plants, which protect soil structure and aid water infiltration and retention, when compared to forests where disturbance from grazing and logging has occurred.
- Larger individual white cypress trees provide important habitat for threatened wildlife and reduce the density of pine seedlings in the immediate area. Removing these larger mature trees will increase pine density, not reduce it.
- The NRC has provided no evidence that logging/grazing/firewood harvesting will provide ecological benefits or maintain conservation values. Given the lack of clear and certain ecological benefits of ecological thinning in these areas, the interventions proposed could very well lead to reduced biodiversity.
- A carefully implemented program of low intensity prescribed burns timed to follow periods of high rainfall when white cypress pine recruitment is high is a possible alternative should any 'thinning' actually be needed. This should be done according to established state-wide fire thresholds adjusted for local species requirements and conditions.
- Heavy machinery used during logging breaks down soil structure and promotes wind and water erosion.

Yours Sincerely

Mark Jones