

## Comments on the proposed “Active and adaptive cypress management in Brigalow and Nandewar State Conservation Areas” draft report.

The major problem with the proposal is whether the continuation of past experimental management can be interpreted as being compatible with the objects and intent of the NPWS Act (1974), ecologically sustainable development, and community expectations. The history of land management, outlined in the draft, is consistent with, and the poor outcomes are similar to, most of NSW.

Reduced eucalyptus germination, coupled with decreasing growth rates where recruitment does occur, reflects adverse changes to soil conditions. Such changes can only be attributed to a reduction in ecological processes that maintained pre-European ecosystems.

It seems most likely that the increasing proportion of white cypress reflects reducing soil fertility. It is also possible that dense stands reflect a genetic variability, as found in eucalyptus, that enables germination in degraded soils, but results in the growth of stunted trees. There is no information in the draft that would exclude these possibilities.

While it is possible to 'manage' native vegetation, the NRC's optimism that eucalyptus trees will regrow, has no basis in fact, but is shared by the Forestry Corporation NSW, as indicated in the recent quote below.

The stands to be harvested are primarily comprised of *E. fastigata* (Brown Barrel) and *E. nitens* (Shining Gum). Additionally, some patches of *E. sieberi* (Silvertop Ash), *E. fraxinoides* (White Ash) and *E. elata* (River Peppermint) occur throughout the NHA. The stands that make up the NHA have undergone numerous selective harvesting operations of varying intensities in the past. Some areas have undergone mechanical thinning in the late 1990's and retained sawlog trees will now be harvested.

Very little eucalypt regeneration has occurred in the previously thinned stands and gaps between mature trees are dominated by understorey shrubs. It is expected that this harvesting operation will provide sufficient gaps to allow for a eucalypt regeneration event. **Care should be taken across the harvest area to ensure that a sufficient seed bank exists in retained stems before harvesting/burning so that adequate regeneration is achieved.**

HARDWOOD FORESTS- SOUTHERN REGION HARVESTING PLAN, Glenbog State Forest  
-Compartments 2336, 2337 & 2338 (13-2-2014)<sup>1</sup>

Unfortunately, in the absence any evidence to prove the claim, it is necessary to rely on faith and trust that more 'gaps' will enable germination and growth, in these formerly 'high productivity' compartments.

The Governments recognise the unique nature of Australia's biota and that the natural inter-relationship between native flora and fauna is essential for the health of the forest ecosystem. Accordingly, they will manage for the conservation of all species of Australia's indigenous forest fauna and flora throughout those species' ranges, and they will maintain the native forest cover where a reduction in this cover would compromise regional conservation objectives, consistent with ecologically sustainable management.

National Forest Policy Statement (1992)

The draft refers to 'Alternative management options to be explored' including 'small experimental re-introduction of other species lost from the ecosystem, such as bettongs, possibly involving fencing blocks to exclude pest species such as foxes and cats.'

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<sup>1</sup>[http://www.forestrycorporation.com.au/\\_\\_data/assets/pdf\\_file/0009/505089/glenbog-sf-cpt-2336-2337-2338-harvest-plan.pdf](http://www.forestrycorporation.com.au/__data/assets/pdf_file/0009/505089/glenbog-sf-cpt-2336-2337-2338-harvest-plan.pdf)

There are, apparently, no circumstances under which FCNSW will condone the fencing of its land to re-introduce fauna essential for forest health. Hence, unless the NRC also argue that native fauna previously played no part in maintaining eco-system functions, particularly tree germination, growth and mortality, it should be supporting proposals to fence appropriate areas.

The production of biochar is also referred to in the draft. As burning would be undesirable in fenced areas, and small scale units are available, trialling the physical removal of over abundant small trees, with low impact and low cost techniques, and converting the biomass to bio-char, to return to the soil, is the preferred option.

Such an approach could also provide for the opportunistic production and supply of sawn timber, craft wood and firewood.

The NRC needs to go further than exploring these relatively simple options, and should be combining them, and implementing them at a small scale.

Progress, and longer term outcomes in these areas could be compared/contrasted with off-reserve efforts.

In addition to the tourism potential, such an approach would confirm the NRC's commitment to ecologically sustainable development, and local communities.

Thank you for the opportunity to comment on the draft.

Robert Bertram

10 August 2014