

Friends of the Pilliga

PO Box 420
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1st November 2013

Natural Resources Commission

Re: Cypress forest management in the Brigalow and Nandewar State Conservation Areas

Friends of the Pilliga is a small, community based environmental organization. It was formed over 10 years ago in response to the Western Regional Assessment of forests and has continued its connection to the issues since then.

In the early 2000s we spent a considerable amount of personal time in fighting for the setting up of conservation reserves of various levels of protection within the BBS. The above-mentioned SCAs were part of those reserves. We have concerns that the above enquiry is an excuse to relax protection of these reserves for short-term commercial profits from timber harvesting disguised as strategic management.

Terms of Reference

1. The terms of reference require the findings to be consistent with the objects of NPWS Act 1974 and principles of ESD. To paraphrase the act, SCAs reserve and protect land that has significant ecosystems, that allows opportunities for sustainable visitor use and can allow mining activities with ministerial approval. Management principles must conserve biodiversity, ecosystem function and natural landscapes as well as allowing sustainable visitor use and research and monitoring. **Harvesting of timber for commercial purposes is not permitted.**

Ecologically sustainable development is development which aims to meet the needs of Australians today, while conserving our ecosystems for the benefit of future generations. It aims to continue and enhance legacy ecological processes through the use of specific developmental strategies. Long term sustainability is not short term mining of the resource.

In each of these requirements, conservation is the priority objective. Socio-economic outcomes are of secondary importance.

2. It appears that the second Term of Reference assumes that the proposed active and adaptive management will go ahead.

There is no explanation in the Terms of Reference of what “adaptive and active management processes” may entail. Thus it is impossible to develop an informed comment.

Strategic Adaptive Management (SAM)

SAM has the following characteristics

- It is a way of addressing complex problems where there is insufficient data to be able to predict outcomes. It shortcuts an expectation that nothing should be done until there is certainty about the outcomes. However complex problems can throw up nasty surprises.
- It initially involves “setting the desired future state” with specific objectives on how it will look.
- It should only be used after disputing parties have agreed to an agenda of questions to be answered using the adaptive approach as well as the development of a hierarchy of objectives to coincide with its values.
- It should be bioregional in scope and collaborative in governance
- It must be a radical departure from established ways of management and requires new ways of thinking about management, new organizational structures and new implementation processes and tools.
- It requires significant resources (long-term funding) to monitor the effectiveness of the action and committed leadership. It is likely to be costly and slow.
- It involves the antagonists in the decision-making. This leads to learning and behavioral change. It cannot be imposed from above.
- It is based on the assumption that managing is different from exploiting.

In the cypress woodlands of the BBS, Strategic Adaptive Management can not be a matter of harvesting willy nilly and see what happens. It is neither sycophantic flexibility nor simply muddling through. It aims at keeping the ecosystem in a desirable zone and entails monitoring ecological thresholds.

It is a four step process:

1. Setting the desired future state
2. Exploring management options
3. Operationalisation
4. Evaluation and Learning

It requires engagement to establish institutional, cooperative and governance processes. It must be placed in context – values, social, technological, economic, environmental and political.

It would require a complete rethink of current practice by NPWS, SF, environmentalists and commercial operators. If stakeholders go into the process with inflexible preconceived ideas of the only possible outcome, and government chooses to do it on the cheap, it is doomed to failure.

And unless the above process is followed, it is not SAM, merely a mechanism to gain access to natural resources otherwise unavailable because of legislation.

Richard Kingsford made a presentation to the NPWS Advisory Council on SAM in 2010. His focus was the Macquarie Marshes and his examples of its effectiveness referred to Kruger NP in Africa. Should it be decided to go ahead with this, it will entail massive change in thinking about reserve management, including acceptance that there may be some commercial harvesting within a reserve. But it will also require changes in thinking within the timber industry. It can best take place on a regional scale which can be provided within the Pilliga. This may be the opportunity to do something to change the direction of reserve management to a landscape context. It could lead to the

reestablishment of complex ecosystems and move away from the management of threatened species on an individual basis.

Active management has not been well addressed in the past with respect to conservation reserves. It may not have fitted with past philosophy but past/current practices don't appear to be working. Species are still becoming extinct even within reserved areas. We don't have the time to wait until the ecosystems, which we have damaged, heal themselves and we may have already lost the natural mechanisms which would have carried out the task. There may be a case to be made for more active management. This will be strongly resisted by many reserve managers.

If there is no resilience in the ecological system, nor flexibility among stakeholders in the coupled social system, then one simply cannot manage adaptively.

Socio-Economic Impacts

These reserves were set aside for conservation purposes. The socio-economic aspects were dealt with in the original decision by generous packages for businesses and people leaving an industry already in decline. They are no longer relevant. A shortage of commercial timber cannot be used as an excuse to reverse conservation decisions. The current situation appears to be the result of poor knowledge of the available timber resource by State Forests, leading to an over-promising of a supply of wood.

Coal Seam Gas

Santos has stated that they do not intend to access SCAs for the extraction of CSG. However that may change in the future. Should timber harvesting be allowed to recommence in SCAs there is potential for conflict between the two industries in areas which have been set aside for conservation purposes. The three purposes are mutually exclusive and only one of them, conservation, is appropriate in an SCA.

Approaches, Methods and Steps

If we assume however that this is a genuine attempt to manage SCAs sustainably there are a number of possible options.

1. Current management of these reserves has been minimal, concentrating on maintenance of roads and infrastructure, dealing with pest species in some specific areas and managing fire. This may not be the best option since it has not led to one species being brought back from the edge of extinction.
2. Reconstitute the CCACs as one strong strategic consultative group, representing industry, community and agencies, as the reference group for the SAM. They need to be trusted and develop trust within the group. Both State Forests and NPWS need to be as open as possible and genuinely consult with the group, not token consultation as has previously occurred. This will be time consuming and require sufficient funding to do the job properly.

If not the CCACs then the Regional Advisory Committees should at least have a role in the development of Plans of Management and in ongoing management of

the Brigalow and Nandewar reserves.

Neither of these groups seems to have been considered in the consultation process.

3. There may be grounds for speeding up the recovery from over-harvesting of the SCAs in the past by thinning dense stands of cypress and bull oak and related species. This should be based on science and would again require sufficient funding. It should be managed by NPWS, not SF, since it should be for conservation purposes, not silvicultural. It would require funding for planning, carrying it out, monitoring of results and analysis of successes and failures leading on to another cycle.

Ecological thinning would be unlikely to have commercial benefits as best ecological outcomes result from allowing thinnings to remain where they are.

4. Alternative methods of thinning need to be considered. Large scale mechanical methods in use initially were unselective, thinning everything in continuous lines. Goanna Tracks, a set of motorbike courses recently constructed in the southern Pilliga on Kurrajong Road, off the Baradine Road near Coonabarabran, has used smaller Bob Cats to remove thick regrowth, leaving ironbarks and producing a park-like landscape.

In any case of using machinery to carry out thinning (or any other woodland management tasks), introduction of invasive plants or pathogens must be prevented by the regular cleaning of the machinery.

5. "Lock-up" of cypress (black and white) in temperate woodland may not be an ecological problem, merely the result of our desire for a quick return to what we consider to be "normal". This may best be dealt with by cool mosaic burning to remove cypress seedlings or some other as yet unconsidered method. It should certainly not be dealt with by the re-introduction of grazing by hard-hooved domestic stock.
6. Use an ambitious, ongoing, complex, varied and adaptive regime of small-scale patch burning to achieve a wide range of ecological benefits rather than simple fire regimes aimed at very few human-centred purposes.
7. Recognise that the Aboriginal perspective on landscape care is a broad complex system (not just limited to the use of fire) that can make an important contribution to management. Enable Aboriginal people to participate in an empowered (non-token) manner.
8. Past management practices by State Forests have suppressed all fire. This preserved the cypress timber resource and also led to the dense regrowth of bull oak. It must be recognized that fire is inevitable in these areas and any active management plans may be modified by subsequent wildfire.
9. Returning the top predator to the ecosystem has worked in the USA. There, re-introducing the wolf in some National Parks has caused unexpected benefits such as an increase in the number of beavers. Re-introduction of the dingo may similarly result in unexpected benefits eg it is possible that small, pine-seedling eating herbivores may still exist in pockets of the woodland. The return of the dingo and hence a reduction in the numbers of foxes and cats may allow the ecosystem to reestablish.
10. Another possible idea may be a small scale experimental re-introduction of other species lost from this ecosystem such as bettongs, possibly involving fencing blocks to exclude pest species such as foxes and cats.
11. Or spreading quandongs, a root parasite, in areas of dense regrowth to weaken and eventually carry out the thinning process. This may also have some Indigenous cultural benefits.
12. Whatever active and strategic management options are decided and carried out under the auspices of NPWS, external oversight is essential eg by the EPA.
13. SAM will be more expensive than current management. Long-term commitment

of funding for the active management process could be available from the selling of timber at a value which truly reflects its cost of production in sustainability terms. This could provide a royalty that could be specifically directed to SAM in both SF and NPWS.

The current industry may find such royalty unviable in which case there may be an opportunity to investigate other high value niche products such as essential oils from the timber resource. These would be smaller in volume but encourage a truly long-term sustainable industry.

All mining operations lead, in the long run, to exhaustion of the resource and decline of the communities involved. Broken Hill and Hill End are good examples. As the timber industry has moved from small scale selective logging to large scale harvesting, it has moved into "mining" the resource. If market forces are allowed to act, the closing down of the current cypress timber industry is inevitable. Opening SCAs to harvesting would merely prolong the life of the industry for a few years.

In dealing with a forested area, it must be recognised that a forest which is well-managed from a silvicultural viewpoint differs markedly from a forest that is well-managed for ecological biodiversity. What one person thinks "looks good" may be ecologically impoverished, consisting of a monoculture of trees of the same age without structured understory. The habitat destruction caused by commercial timber harvesting activities cannot be justified in an area reserved for conservation outcomes.

In Summary

Genuine SAM may have great ecological and, eventually, economic benefits. On the other hand, Friends of the Pilliga oppose the harvesting of timber for commercial purposes in State Conservation Areas. It is not allowed by the Acts, it would destroy the conservation values of these reserves and would set an appalling precedent for other reserves throughout the state.

Yours faithfully

Jane Judd

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