



Hunter Environment Lobby Inc.

PO Box 188
East Maitland NSW 2323

Natural Resources Commission
GPO Box 4206
Sydney NSW 2001

Friday 25 October 2013

Dear Commissioner

Brigalow and Nandewar Cypress Forest Management

Hunter Environment Lobby Inc. (HEL) is a regional community-based environmental organization that has been active for more than fifteen years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL has an interest in management issues relating to conservation lands within the Brigalow Belt South (BBS) bioregion because it overlaps into the Hunter region. HEL participated in the Western Regional Assessment that resulted in new National Parks and State Conservation Areas (SCAs) to protect the significant remnant woodlands in the bioregion.

HEL supported that outcome with the understanding that areas protected as SCAs would no longer be subject to commercial timber harvesting operations.

The woodland remnants of the BBS and Nandewar bioregions are critical for biodiversity resilience in the heavily cleared wheat-sheep belt of the central division of NSW.

HEL has confidence that a well resourced National Parks and Wildlife Service (NPWS) has the skills and capacity to adequately manage the areas now under their control for ecological outcomes.

The BBS and Nandewar SCAs have been under NPWS management since 2005. There is no evidence that any recent scientific research within these areas has indicated the need for a rapid increase in active management.

HEL objects to these areas being referred to as cypress forests. This is forest industry terminology and does not reflect the ecological communities that occur within the SCAs being assessed under this process.

If needed, the best active management to improve ecological values in areas of cypress, artificially managed in the past as quasi plantations, is cool mosaic burning to remove young cypress regrowth.

Cypress that has reached a harvestable size will be providing habitat values for birds and mammals within a mixed woodland habitat.

HEL does not support the reintroduction of grazing of hard hooved farm animals into these ecosystems or the introduction of widespread manual or mechanical thinning as active management processes.

HEL strongly opposes the reintroduction of commercial cypress harvesting in these areas. There are a number of key issues relating to the proposal in the Terms of Reference for the assessment to consider '*commercial opportunities derived from....silvicultural or thinning programs*'

These include:

1. Silvicultural programs are related to managing an area to produce harvestable timber, not for improving ecological values. This is forestry industry terminology.
2. SCAs are not commercial timber harvesting areas.
3. NPWS rangers are the primary managers of SCAs. They should not be required to manage commercial timber harvesting operations.
4. The habitat destruction caused by commercial timber harvesting activities cannot be justified in an area reserved for conservation outcomes.

HEL believes that ecological sustainable development principles should relate to mining activities in the management of an SCA. The reintroduction of commercial timber harvesting is highly inappropriate and cannot be managed to '*maintain and enhance environmental values.*'

HEL trusts that the Natural Resources Commission will come to the conclusion that the best approach for actively managing cypress regrowth in the BBS and Nandewar SCAs for ecological outcomes is through a well structured seasonal mosaic burning program.

Yours sincerely

A handwritten signature in cursive script that reads "Jan Davis".

Jan Davis
President