



The Wilderness Society

c/o PO Box 414,

Hamilton NSW 2303

1 November 2013

Natural Resources Commission

Re: Cypress forest management in the Brigalow and Nandewar State Conservation Areas – response to the Terms of Reference

Thank you for the opportunity to comment on the NSW Government proposal to develop an active and adaptive management program for cypress forests in Brigalow and Nandewar State Conservation Areas.

Please consider our below feedback on the terms of reference.

Under the Terms of Reference, the NRC will:

- 1 assess the potential environmental and socio-economic impacts and benefits of undertaking adaptive and active management processes in Brigalow and Nandewar State Conservation Areas, consistent with the objects of the *National Parks and Wildlife Act 1974* and specifically the principles of ecological sustainable development**

Comments:

The Wilderness Society notes and support that ecological thinning and silviculture of dense cypress is already permitted within Brigalow and Nandewar State Conservation Areas, however, only for non-commercial purposes and it must be carried out to enhance habitat values and ecosystem function.

We acknowledge the stated intention of this review in prioritising positive environmental outcomes. We also acknowledge that timber supply opportunities are a driver of this review, based on regional media from local politicians.

Definitions throughout this review could be improved. 'Adaptive and active management' is clearly terminology that means a variety of activities to various users and should be clearly defined for the purposes of this review.

We note even the definition of 'ecological sustainable development' is currently being reviewed under proposed changes to the NSW Planning Act, and as such, requires clear definition in the terms of reference.

Ecological thinning in the Brigalow and Nandewar State Conservation Areas is highly unlikely to be able to provide the sustained commercial output desired by the timber industry. Ecological thinning of the smaller cypress trees may well help the integrity of the bush in the State Conservation Areas, but it is unlikely to be a strongly viable commercial enterprise.

Additional recommendation:

In terms of ensuring a continued supply of timber for the designated state forests in the Brigalow and Nandewar region, the Wilderness Society recommends a future inquiry that investigates the impacts of the proposed coal seam gas field development in the Jacks Creek and Pilliga State Forests. It would consider the economic impact on forestry from this coal seam gas field activity, involving hundreds of cleared pads, roads and heavy industrialisation that may have a detrimental impact in limiting the availability of timber in the region.

We note that in the recent small scale initial period of exploration activities, gas drilling is already causing a disruption to Forestry users in the Jacks Creek and Pilliga East State Forests. We also note the numerous kill and spill sites that have already taken place in these Pilliga region state forests, which staff last week told our representatives would take around 50 years to regenerate. The killing of vegetation in areas of State Forests for 50 years does not appear to be conducive to a sustainable and economically viable timber industry in the region.

Certainly our submission to any future inquiry of this nature would state our concerns with the removal of large habitat and hollow bearing trees for coal seam gas activities in our State Forests and State Conservation Areas. These concerns are both from an ecological and sustainable forestry perspective.

2 identify approaches, methods and suggested next steps as options to develop an active and adaptive management program for cypress forests to maintain and enhance environmental values in Brigalow and Nandewar State Conservation Areas.

Comments:

The Wilderness Society understands that Cypress Forests are completely different forest ecosystems to coastal forest and may require different management techniques. This understanding is already embedded into the management plan for the Zone 3 **Brigalow and Nandewar** SCAs which allows for non commercial ecological thinning and silviculture.

We also acknowledge the work of the 2010 NRC Report which concluded that, all cypress forest managers on public land, including those managing cypress forests as reserves, should actively manage all cypress forests.

The Wilderness Society respects the current conditions and management plan over the forest and would encourage the SCA cypress forest areas to be more actively managed.

However, we note the undefined nature of the “active and adaptive” management proposed by the NSW Government for this review. Timber sizes likely to be useful for commercially viable silviculture may involve logging practices that would be inconsistent with the objectives of the National Parks and Wildlife Act, such as the habitat clearing for threatened flora and fauna species or the degradation of soil and water.

The State Conservation Areas are set up to support the large and hollow bearing trees that provide shelter for threatened species that have few options for habitat left in the region. Unfortunately, the trees best suited to commercial benefit are also the ones most significant for ecological outcomes. Certainly better clarification of what commercial opportunities could arise from the thinned cypress by-product would be of interest to better considering the impacts of such commercial activity.

Carrying out any active management of cypress under the current management agreement should ideally be undertaken by local people trained in thinning for ecological outcomes. We would encourage work opportunities to be extended and involve dedicated Aboriginal land management positions that respect Aboriginal cultural heritage sites and practises.

Ecological burning could also be explored for the ecological management of cypress regrowth. Such practises could be considered from a range of cultural, ecological and economic carbon abatement perspectives that may or may not be appropriate for the region.

Yours sincerely,

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