

South East Timber Association - NSW Forest Monitoring and Improvement - Submission on Draft Program Strategy

INTRODUCTION

The South East Timber Association (SETA) supports the proposal to establish the Forest Monitoring and Improvement Program. In 2018, a proposal to have cross tenure monitoring of forests was accepted and funded, as part of the NSW Road Map. While the strategy suggests this is the general intention, SETA has concerns that all funding and work will focus on state forests and performance of the parks and reserves system in delivering biodiversity services will be unfunded.

The strategy states: *The Program will deliver information and evidence to support the strategic management of forests and forest practices in NSW on both public and private land. (Page 1)*

Around 58% of NSW forests are on private or leasehold land, around 27% held in conservation reserves and around 10% held in state forests and managed for multiple uses including forestry and recreation. (Page1)

Previous reviews of forest management in NSW, such as the independent review of the NSW Regional Forest Agreements (RFAs), have highlighted a gap between forest science and forest management in NSW, which needs to be addressed. This is an issue for all forest tenures, including the conservation estate and for production forests. NSW forest managers, on both public and private land, should be continuously monitoring their management practices and responding to better evidence about sustainable management. (Page 2)

After much general discussion, on page 13, we are advised: *The first priority in the Program is to design and recommend to the NSW Government a monitoring and evaluation plan for the Coastal IFOA on state forests in 2019.*

It is of great concern to SETA members that there are no equivalent actions to be applied to the conservation reserve system. There must be equivalent attention and performance expectations placed on parks and reserves managers, as those placed by communities on state forest managers.

HISTORIC CONTEXT

There is increasing evidence that the current conservation management principles, rooted in a terra nullius view of the Australian environment are failing to reverse the growing list of threatened species and increasing areas of wildfire devastated or otherwise unhealthy forests.

If there is to be ecological sustainable forest management, the role of Aboriginal fire management in the evolution of the Australian biota must be acknowledged. The massive disturbance to the Australian biota, due to the loss of Aboriginal fire management after European arrival, has not been recognised by many ecologists and land managers.

The legislative and regulatory framework has a number of elements which are also dependent on terra nullius principles for their rationale and ongoing existence. For example, the *Wilderness Act 1987* stands as a symbol of the terra nullius view of the NSW environment. It is applied to conservation reserves which are relatively remote from the



bulk of the NSW population, or where most people are actively excluded. It also enshrines the myth of "permanent protection."

The objects of this Act are:

(a) to provide for the permanent protection of [wilderness areas](#),

(b) to provide for the proper management of [wilderness areas](#), and

(c) to promote the education of the public in the appreciation, protection and management of wilderness.

All parts of the NSW conservation reserve system were once actively managed by Aboriginal people. The permanent protection envisaged by the Act has failed to conserve ecosystems and species. Individual plant and animal species, which have evolved in an environment of regular disturbance are reducing in number and are "permanently protected" to the brink of extinction. For the faunal occupants, uncontrolled or irregularly controlled predators and wildfires add to downward pressure on populations.

Forests become overgrown, as the density of understorey and regrowth of overstorey species is no longer managed at the seedling stage by low intensity fire. The higher volume of elevated fuels push our forest ecosystems into a cycle of wildfire at a scale and intensity that is unsustainable in the short, medium and long term.

In recognition of prior Aboriginal stewardship of the NSW landscape and accepting the concept of "permanent protection" is an anathema, **it is recommended the *Wilderness Act 1987* be repealed**, as it is a legislative obstruction to ecologically sustainable forest management in significant parts of the conservation reserve system.

PARKS AND RESERVES MONITORING PROGRAM MUST BE BROUGHT FORWARD

The following example highlight that parks and reserves in NSW and other states are not meeting expectations for at least some threatened species. On 5th May 2016, the Threatened Species Scientific Committee advised the Federal Environment Minister, that the South Brown Bandicoot should remain on the Endangered Species list. One of the key justifications was the following summary table.

Available quantitative data are summarised in the table below.

Population	State	Decline
Ben Boyd National Park	NSW	44% (1999 to 2008)
Nadgee Nature Reserve	NSW	47% (1999 to 2008)
Port Campbell	Vic	>70% (past 10 years)
Pines Flora and Fauna Reserve	Vic	100% (extirpated around 2006)
Mt Lofty Ranges – northern metapopulation	SA	100% (extirpated around 2009)

On 2 June 2016, the Eden Magnet reported, *Southern brown bandicoots captured in state forests south of Eden are being relocated to the Booderee National Park at Jervis Bay. Forestry Corporation staff in Eden are working in partnership with Parks Australia and Taronga Conservation Society on the project.*

Booderee National Park has been devoid of populations of small mammals for almost 100 years after they were decimated by foxes and cats.



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If the conservation reserve system was performing to expectations, why were these animals sourced from state forests?

In late 1992, an initial area of 4,000 hectares of Tantawangalo State Forest was dedicated as a nature reserve to protect an estimated population of 40 to 45 adult koalas, which was said to be the most significant colony in south eastern NSW.

On the 25 November 2011, the koala listing advice to the environment minister stated on page 12, *Recent intensive surveys show that a population at Tantawangalo/Yurammie is now very small and possibly extinct.*

As of February 2019, NSW has over 7,150,000 hectares (79.89%) of available public land in conservation parks and reserves and 1,800,000 hectares in state forest.

The general community and regulatory expectation, is conversion of state forest to national park will provide "permanent protection" for threatened and other species. The above and other available examples indicate that the NSW reserve system is failing to meet community expectations in relation to biodiversity protection.

SPECIFIC QUESTIONS

1. Is the proposed Program design sound and how can it be improved?

The program must be designed to have scientific rigor. One test of rigor will be whether scientific results that are used to inform the program consider both positive and negative outcomes from particular management actions.

Given the evidence of a silo mentality within individual government agencies, the departmental silos are highly likely to see funding used to progress departmental territorial issues, rather than forest and conservation sustainability issues.

It is recommended that there must be consensus among representative on the distribution of program funds and rationale must be made public.

Due to the need for a long-term focus, it is recommended that the program be legislated to ensure durability over time. As an interim measure, an interdepartmental agreement should be draw up to ensure all government agencies are aligned.

The paper has not considered how this program will link with federal programs, including those that relate to threatened species recovery. including the office of the Threatened Species Commissioner.

It is recommended the Steering Committee have Commonwealth representation to ensure RFA and Commonwealth threatened species interests are considered.

The skills base of the independent members of the committee need to be much broader than the current nominees. Expertise in applied fire management is one omission.

It is recommended that members with applied ecological and fire expertise from an organisation such as the Australian Wildlife Conservancy, be added to the current committee.

From publicly available information, it is not clear if the steering committee has representatives from the Forest Corporation of NSW (FCNSW) or Local Land Services (LLS). FCNSW is the second largest manager of public native forest in NSW. LLS staff have ready access to the owners of private native forest.



It is recommended that a nominee from FCNSW and LSS be appointed to the steering committee, if they are not already included.

The program should initially draw together existing science, rather than wasting time and money commissioning a raft of "new research," which may do little more than monetise the institutions and departments that provide the committee members. Without a state-wide plan, how will the Steering Committee be sure that the limited funding is allocated to the priority areas?

It is recommended that the Program design a State-wide monitoring and evaluation plan for the NSW Parks and Reserves and State Forests in 2019. Biodiversity measures should be consistent across tenures, to the maximum practical extend. Specific measures, to reflect different activities in reserved and harvested areas should be the minimum necessary to meet program objectives.

2. What are the priority issues and decision needs the Program should focus on?

Despite the toll taken on biodiversity in NSW over the past 2 decades, wildfire is mentioned once in the strategy document. In the summer of 2002-03, over a 60 day period, about 2,400,000 hectares of mostly forested land along the main range in the ACT, NSW and Victoria was burnt by wildfires. There was 1.4 million hectares burnt between Canberra and the Victorian border. The CSIRO estimated 370,000,000 (370 million) birds, mammals and reptiles were killed in that period across the 2,4 million hectares.



2002-03 Fire Devastated "Protected "Forests – Not Sustainable, Recovery Not Adequately Monitored

It is recommended that a subcommittee develop a monitoring plan to document fire area and intensity by land tenure across NSW.

The NSW Government has committed to ecologically sustainable forest management, including maintaining or increasing the full suite of forest values for present and future generations across the NSW native forest estate

Outside of formal RFA processes, there is a history of transfer of state forests to national parks on eco-political grounds, often at a significant socio-economic cost to affected communities.

It is recommended a subcommittee establish a transparent process, so stated ecological gains can be confirmed and the socio-economic costs established, before there are anymore transfers of biodiverse and productive state forests to the reserve system.

A widespread, but insidious issue, is the general decline in forest health across large areas of the native forest estate, outside those decimated by high intensity fires. This issue links back to the megafire issue, as the elimination of frequent low intensity burns, not only exacerbates megafire risk, it also changes soil chemistry and nutrient cycling, which impacts on general tree and forest health.

Insects that overwinter or otherwise reproduce in the litter layer also benefit from loss of low intensity burning. Due to higher survival rates, these insects cause abnormal levels of defoliation in many forest areas. Intense competition from historically high tree numbers and understorey also contributes to the stand stress.

Among other symptoms, unhealthy forests have excessive numbers of trees with crowns dominated by epicormic growth. Epicormic shoots are a response to significant stress and have significantly less flowering capacity than normal healthy crowns. Loss of flowering capacity potentially impacts on food resources for threatened species such as the Swift Parrot and flying foxes, as well as native and introduced bee species and other flower and nectar dependent species.

It is recommended that a subcommittee be established to review current science and develop the section of the plan to document and monitor the decline in general forest health across public land.

There is no mention of pest plants and animals in the strategy, despite predators and other introduced species and invasive weeds being a key threat to ecologically sustainable forest management.

It is recommended that a subcommittee be established to develop the pest animals and invasive weed monitoring section of the plan.

3. How can organisations within and outside of the NSW Government contribute monitoring and research on NSW forests coordinated by the Program?

With LSS representation on the steering committee, this will provide access to influential land owners, as well as Landcare and other local/regional environmental groups.

There are already a number of community and other groups monitoring/surveys of various kinds. Accessing existing information from these surveys should be a first step. Once gaps or specific monitoring needs are identified, additional monitoring can be planned.

CONCLUSION

SETA supports the overall objective of ensuring NSW native forests are managed in an ecologically sustainable way. To do this, it will be critical to sort the eco-political research rooted in terra nullius, from scientific research that recognises Australian biota has been shaped by the long-term management of the Australian landscape by Aboriginal people.

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