

From: [Annabelle](#)
To: [NRC](#)
Subject: Re: Landholder's Right to Farm Submission - CEEC
Date: Monday, 28 April 2025 12:00:10 AM
Attachments: [AB NRC Submission.pdf](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

[CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.]

Submission to the Natural Resource Commission

nrc@nrc.nsw.gov.au

**Re: Restoring biodiversity and supporting landholders in regional landscapes.
Critically Endangered Ecological Communities**

Dear Commissioner,

The Landholder's Right to Farm Group first wishes to thank the Natural Resource Commission for taking the time to consider the impact of a CEEC designation, as well as the errors on the NVR Map, and their effect on the landholders of the West Wyalong-Tallimba area in the Bland Shire.

The NSW Government has applied a regulation without any consideration of the economic, social, and environmental impacts on the key stakeholders - the landholders - who have cared for and managed this native vegetation for decades.

The Landholder's Right to Farm Group shares a deep commitment to our environment. For our landholders, words such as biodiversity, sustainability, and regenerative conservation are not just concepts - they are daily practices. We believe that true biodiversity and sustainability drive long-term success, both for the environment and for rural communities.

Our landholders are the real land stewards of the Bland Shire in NSW. For decades, they have cared for and preserved the native vegetation in our region. It is their efforts that have allowed the native ecosystems of West Wyalong to not only survive but thrive. Instead of clearing land solely for sheep and grain production, our landholders have deliberately protected and worked alongside the native vegetation, balancing productivity with conservation.

Yet rather than being recognised and respected for their stewardship, the NSW Government has treated our landholders with contempt - subjecting them to criminal accusations and stripping away their ability to use their land in any meaningful way to earn an income. Landholders who invested in properties for specific purposes - whether for eucalyptus oil production, broombush harvesting, grain production, or mixed farming - are now being denied those rights under the PINK designation, which was applied without warning, communication, or consultation.

In some cases, landholders have had up to 90% of their property listed as PINK - leading to a devastating 90% loss of potential income - yet no compensation has been offered. We have

landholders nearing retirement who now face a 40% loss in land value due to the PINK designation, meaning a 40% loss in land held as superannuation. Again, no compensation has been provided for this unjust loss - a loss caused not by the landholders' actions, but by the arbitrary actions of the NSW Government.

CEEC Listing not advised

There has been no communication to key stakeholders about the CEEC listing, which we now know was applied in 2010. The Bland Shire Council was not informed. Local Land Services were not informed. Not one landholder in the West Wyalong area was informed. There was no communication about the listing to any landholder by email, letter, or phone in 2010 through 2021.

2021 - was the first time any landholder in the area was made aware of the CEEC listing, and this came via Notice of illegal land use issued by the Department's Compliance & Regulation division – first of what would be many such unfair and wrong accusations from DECCEW on members of our community.

Before investigations commenced –

- It would have been helpful for compliance officers to first ensure they learned what a Blue Mallee and Broombush looked like, so they could identify a Mallee and Broombush in the field.
- It would have been valuable for them to enquire about the unique and established coppicing of Blue Mallee and Broombush – regenerative agricultural management that has been practiced in this area for over a century.
- With this background knowledge, compliance officers would have been well equipped to determine that the error lay in the NVR Map and make appropriate recommendations for the accusations to be withdrawn.

At a time when so many Australians are facing a cost-of-living crisis, the pursuit of these unfounded accusations has led to the unnecessary use of government resources and taxpayer funds. Significantly, the impact on the mental health of our community has been profound and deeply damaging.

Proven Mapping Error – Coppiced Blue Mallee & Broombush Misclassified

The NSW Government has stated that the NVR Map is not 100% accurate - yet the compliance team acts as though it is. A document has been submitted to the NRC that shows satellite photographs of an area where a landholder is currently under investigation of land clearing – 100% the result of error on the NRV Map

The NSW Government states that *“despite using the best available science and undertaking several reviews, it is acknowledged there may be some inaccuracies at a property level”*. And states *“the purpose of publishing a draft map is to ensure any areas mapped to the wrong category are identified and updated before a final map is published”*.

Why then, does the NSW Government continue with accusations based on map errors?
Why then does the Map Review Team disregard information provided by landowners and

Local Land Services?

Mallee & Broombush listing

We have compiled information that the native vegetation of Blue Mallee and Broom Bush are not critically endangered. We recently received initial advice from a former member of the Commonwealth Threatened Species Scientific Committee, providing determinations on threatened species:

1. Mapping errors due to reliance on satellite interpretation – often wrong in both identification of species and vegetation boundaries. (Our independent geo-referenced drone mapping has demonstrated mapping inaccuracies of up to 200 metres)
2. The Department's assumption that leaf harvesting = disturbance = removal and eradication of the tree. In fact, leaf harvesting, coppicing etc is totally sustainable and does not kill or remove or destroy the trees.
3. The Threatened Species Scientific Committee has made the obvious mistake of assuming that every occurrence of the target species is remnant untouched native vegetation. Wrong, there has been 100 years of sustainable management.
4. IUCN recognises and even advocates for "Conservation through Sustainable Use" as does the UN Convention on Biodiversity.
5. Growers have been undertaking enrichment plantings over a long period of time. It is entirely plausible that the current area is equal or greater than the original (pre-European) natural distribution because of this care, stewardship and enrichment.
6. The listing as critically endangered is a dangerous decision that should be revoked immediately before it causes more harm to those woodlands (as well as social and economic losses to those who have been caring for these forests/woodlands).

It is worth noting that the Mallee and Mallee Broombush ecological community was listed as 'critically endangered' in 2010. The definition of critically endangered is "*an ecological community may be listed as critically endangered if the Scientific Committee determines it is facing an extremely high risk of extinction in Australia in the immediate future*". 15 years on, with no additional management, the CEEC is, as expected, thriving. Additionally, we have consulted scientists who work with this vegetation and who state that the vegetation isn't and never was critically endangered.

We have reason to believe the original listing is flawed - the author of the 2010 listing states Mallee & Broombush as having a pre-European settlement extent of 800ha+/- 30%. On one property in the area alone, there is approx. 800 ha of Mallee and Broombush.

Either the listing is not correct, and/or the NVR Map is not correct. The vegetation listing needs to be corrected as livelihoods lie in ruins due to this incorrect listing and subsequent mapping errors.

Blue Mallee Research

Published academic papers by CSIRO and ANU scientists stem from over 40 years of research undertaken from natural production stands of Blue Mallee. From this scientific research, an extensive tree breeding program has been devised and resulted in the planting of over 4,000,000 native Blue Mallee seedlings that are thriving. Additionally, a seed bank and seed orchard utilised by researchers that stems from original natural production areas. It is irrefutable that there are more Blue Mallee trees in this area now than 40 years ago due to this stewardship and scientific engagement. NSW should be proud to sustainably produce eucalyptus oil from West Wyalong – a natural product, produced from its place of origin.

In conclusion

It is time for the NSW Government to work with - rather against - the landholders of the West Wyalong -Tallimba area, to work the science of environment with the science of sustainable agriculture. The IUCN promotes Conservation through Sustainable Use, as does the UN Convention on Biodiversity - and it's time that the NSW Government does the same. This is a tragic situation that must be immediately resolved – real lives hang in the balance.

Kind regards,

Annabelle Davis

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]