



Cooma Branch

Submission for NRC Review on NSW Plan For Nature

I am writing this submission as a Monaro landholder, and in my capacity as Chair of the Cooma branch of the NSW Farmers Association.

This submission is focused on the Draft Native Vegetation Regulatory Maps. We believe the adoption of this map in its current draft form would be very detrimental to the Monaro, both in terms of agricultural productivity and in the preservation of the native grasslands they are intended to protect.

While I believe it is sensible to work toward a map based regulatory system, the current draft maps are grossly inaccurate in mapping the MCV and HCV grasslands they seek to protect under the legislation. This high level of inaccuracy will lead to a massive cost impost on agricultural productivity, an inability to control our invasive weeds, and a consequential rapid decline in condition of the native grasslands.

The 90% accuracy level cited by the department does not stand up to any scrutiny in the case of the Monaro. While there is little transparency in terms of total areas involved, it appears at least 65% of Monaro agricultural land is regulated by the maps. Yet the best estimates of the area of MCV and HCV grasslands on these agricultural lands are in the vicinity of 10% to 15% of the total area. This suggests the draft regulated area captures four to five times the area that is sought to be protected, and their accuracy is much closer to 20% than the purported 90%.

The consequences of regulating an area that covers two thirds of Monaro agricultural land are profound and far reaching, and I have listed some key impacts below.

1. Effective and timely broad acre weed control will be deemed an illegal activity on the majority of Monaro farmland. Given African Lovegrass and Serrated Tussock already represent the greatest threat to both agricultural productivity and native grassland preservation, this would be a disaster for farmer financial viability, and for conservation.
2. While incorrectly mapped areas can be assessed and corrected by the LLS, the magnitude of the job has not been considered or resourced. Based on the numbers cited above, half the agricultural lands on the Monaro (ie the gap between the 65% regulated, and the 15% that contains MCV/HCV grasslands) would need to be assessed and recategorized, on a paddock

by paddock basis. The scale of this job and the resources required has not been quantified, but will inevitably hamstring agricultural activity and especially weed control. Timeliness is of the essence in agriculture, and completely incompatible with what is already a six month plus delay for an LLS vegetation assessment.

If there is 300,000 ha incorrectly mapped, that would constitute 10,000 paddocks that need to be assessed and corrected by LLS, based on a 30 ha average paddock size.

3. While the average farm will have to deal with 65% of farm area being regulated, some farms will be 90-100% regulated. There is no plan to deal with this inequity. Financial benchmarking of farms on the Monaro would suggest that a farm that is >50% regulated will not be financially viable over the long term. There is evidence that the extent of regulated area is already impacting farm values, and this gap will escalate if the current draft maps are adopted.

Monaro farmers have long advocated for an opt-in mapping system, whereby farmers guided by expert assistance, map their higher conservation grassland areas, and manage them to enhance biodiversity. These maps would need to be signed off by the LLS, to ensure the HCV/MCV areas are captured. A farmer initiated map would both increase landholder co-operation and goodwill, and allow the farmers to map the higher conservation grasslands with far greater precision.

Introducing maps in their current form, where the regulated area is many multiples of the HCV/MCV area, will kill both best agricultural practice and essential weed control, and ultimately the grasslands themselves. Any goodwill will be destroyed as farmers clearly understand the perverse outcomes that will result, and the impost that is being unnecessarily imposed on them and their livelihood.

I attach as Appendix 1 work that was done by Monaro Farming Systems in producing example farm maps on four Monaro farms. This was done with expert advice and vegetation assessment, to ensure all MCV/HCV grasslands were captured. They are included to illustrate the value of a farmer initiated mapping system.

Regards

Richard Taylor
Chair NSW Farmers – Cooma Branch

Appendix 1. Example Mapping On Four Monaro Farms

A key outcome of Stuart Burge's "The Monaro Kangaroo Grass Strategy Report" was that the most rational basis for developing native vegetation regulatory maps was that this be done by landholders (with expert support), and authorised by the LLS. The advantages of this approach are:

1. Conservation areas are proactively identified rather than identified by default when land use decisions are made, or never identified. This allows pro-active management, which the report highlights is essential to maintain or enhance conservation value. Importantly, this also provides evidence and certainty of the extent of areas that are being managed for conservation. Farmers have been maintaining for years that there are large areas of the Monaro that will never be sown to improved pastures, due to lack of arability etc. However, we have never been able to provide evidence of these areas.
2. Buffer zones can be built around designated areas to maintain high levels of weed control and help maintain integrity of the conservation areas.
3. Where native grasslands are of low conservation value, decisions can be made with a view to scale, arability, weed status, and potential productivity. It is much lower cost for landholders to designate areas of lower arability/productivity as conservation areas, rather than the more productive areas of the farm. Medium and high conservation areas (approx. 15% of Monaro) would be maintained as native vegetation, but there would be more flexibility in the high proportion of area designated low conservation native pastures (55% of Monaro).

Importantly, this would be a voluntary system, where landholders could elect to develop an authorised farm plan, or remain under the standard regulatory regime.

Authorised farm mapping would only be acceptable if it became the regulatory framework for both State and Federal vegetation regulation.

To illustrate this approach, example farm plans have now been developed for four farms on the Monaro, two in the Nimmitabel, and two in the Bombala area, reflecting a range of soil types and terrains.

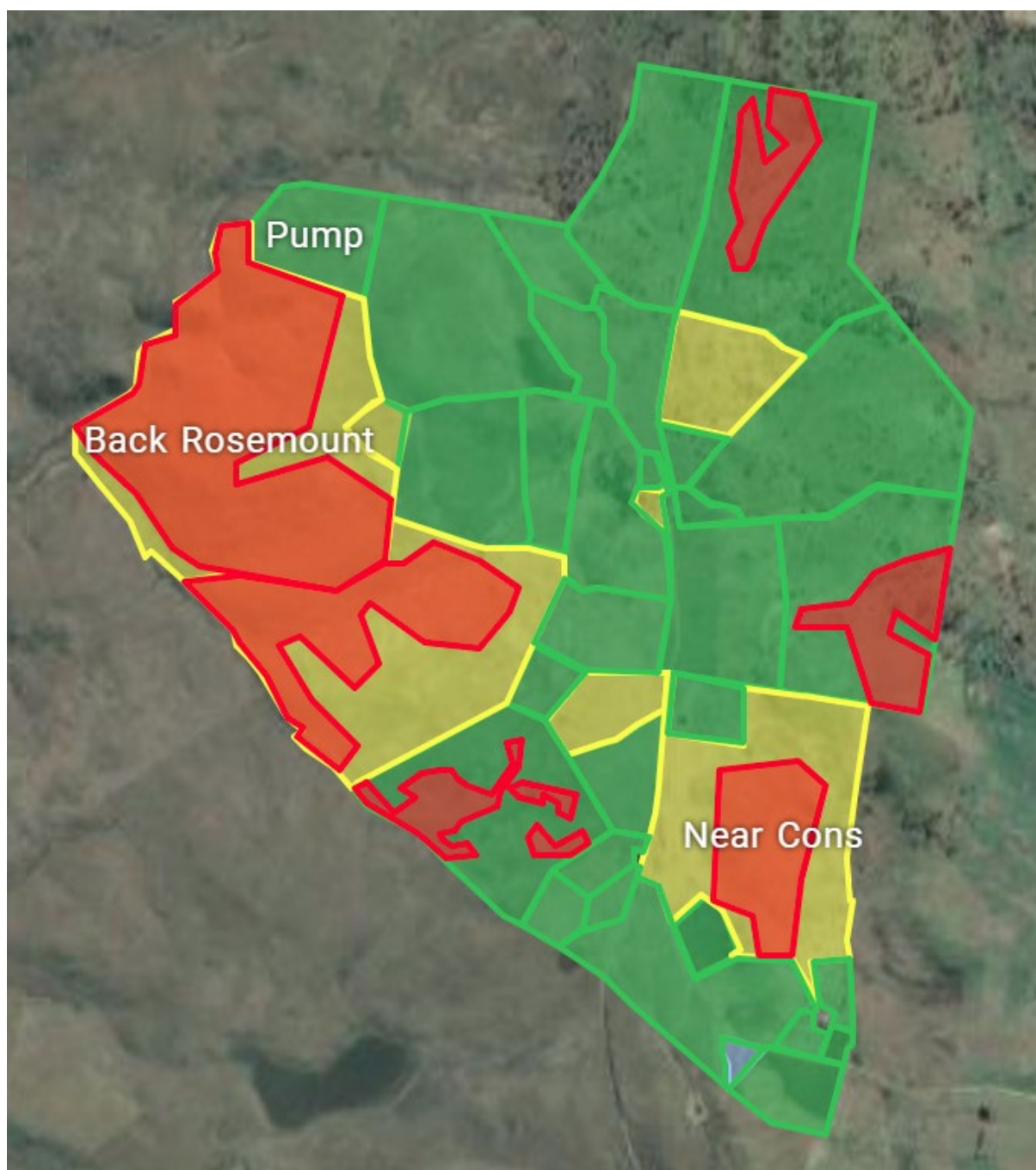
Farms were mapped both on current land use, and also on farmer intentions of land use when the farm is fully developed. Key areas are tabled on the page 2.

Breakdown of Property by Area (%)

	Average	Farm 1	Farm 2	Farm 3	Farm 4
Total Property Area (ha)	997	1390	782	932	884
Area Currently Sown to Improved Pasture	34%	48%	14%	40%	34%
Additional Area Considered for Improved Pasture	25%	12%	39%	20%	30%
Total Final Area Sown Improved Pasture	59%	60%	53%	60%	64%
Total Final Area Native Vegetation	41%	40%	47%	40%	36%

Comments:

- Final planned improved pasture area averages 59% (range 53% - 64%), though there is a wider range in the starting level of improved pasture.
- Final area of native vegetation is 41%, approximately three quarters of which is in large enough areas to be managed separately for fertiliser etc. The smaller areas of native vegetation interspersed in sown paddocks are rocky knobs, timbered clumps etc that are not arable.
- The 41% final native vegetation area captures all the current areas of moderate or high conservation grasslands, which constitute around 25% of total farm area. This is a little higher than the Burge MKGS report which estimates that 15% of Monaro farmland is moderate to high conservation value grasslands.
- The 34% starting level of improved pasture is marginally higher than the Burge estimate of 30% of Monaro farmland currently sown to improved pasture.
- While some Monaro farms will have a higher level of arability and sown pastures, there will also be farms with lower arability and less potential for pasture improvement. It is likely the four mapped farms are average for the Monaro.
- An example farm plan is shown on page 3.



Legend

-  = Sown Paddock (Phalaris or Lucerne).
-  = To be sown
-  = Managed Medium Conservation Value Native Pasture
-  = Planted native tree shelter belt