



New South Wales

**DEPARTMENT OF PRIMARY INDUSTRIES**

DA06/886

- 2 JAN 2007

Mr Alex McMillan  
Executive Director  
Natural Resources Commission  
GPO Box 4206  
SYDNEY NSW 2001

Dear Mr McMillan

Thank you for the opportunity to provide comments on the proposed amendments to the Environmental Outcomes Assessment Methodology in relation to the Land and Soil Capability (LSC) Tool.

Staff from NSW Department of Primary Industries (NSW DPI) participated in a workshop with the Department of Natural Resources in September 2006 in which the science behind the LSC Tool and its operation were outlined. Officers from NSW DPI were then subsequently involved in a technical review of the LSC Tool management actions in October 2006.

The proposed management actions appear to be largely consistent with NSW DPI's technical input to the review with the exception of some issues of detail which are outlined in the Attachment to this letter.

However, NSW DPI regards the LSC Tool as unnecessarily complex with a highly prescriptive and repetitive list of management actions. In the interests of achieving better landholder engagement in native vegetation management, the Department recommends that the management actions be simplified and more outcomes based. I believe that this approach would allow for greater flexibility and innovation by landholders in meeting the 'improve or maintain test' of the PVP process through negotiation with the Catchment Management Authority.

Central to this outcomes based methodology would be the development of simple guidelines which establish the principles for negotiating management action details relevant to the landholder's circumstances as they relate to meeting their obligations under the *Native Vegetation Act 2003*.

I trust this advice is helpful. Should you require any clarification on my comments, please do not hesitate to contact Mr David Coleman, Resource Management Officer on 02 6391 3342.

Yours sincerely

**ALAN COUTTS**  
**ACTING DIRECTOR-GENERAL**

Encl

**NSW DPI's Suggested Changes to Management Actions  
Land and Soil Capability Tool**

- Maintaining particulate organic carbon (POC) levels as a Dryland Cropping Management Action. NSW DPI does not believe that this management action is practical as it is very hard to achieve measurable increases in organic carbon levels in Australian soils. POC can also vary from season to season.
- With respect to Acid sulfate soil, NSW DPI does not agree with the following management action " Minimising soil disturbance or drainage changes below 1m depth, below 1m Australian Height Datum (AHD), or below local high tide level, whichever is the higher level." The problem with this management action is that the surface of much agricultural land may be well below 1m AHD on a coastal floodplain, but still have its Acid sulfate soil hazard material 2m or more below the surface. This is the case for a significant area of the Shoalhaven floodplain. NSW DPI would prefer that this management action be amended by removing the references to AHD and high tide level and instead just use the stated first reference to depth, which is based on the actual depth from the ground surface to the hazard material, as presented in the DNR hazard maps.
- Management actions for erosion control should highlight the importance of maintaining ground cover in drainage lines.