

Response to NRC from The Cobar Vegetation Management Committee:
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Muhlethaler, R Neate, M Nicholson, S Viant

On

Review of the Invasive Native Scrub Assessment Methodology and
Decision Support tool of the Property Vegetation Plan Developer under
the Native Vegetation Act 2003

4 August 2006

Saunders D, Shepherd R, Kneipp K, Norman P, Raine C, Green D,
Briggs S, Howling G and Ferraro T.

The Committee after considering the recommendations of the Review Group submit the following as relevant amendments.

Glossary

Page ii - Paragraph 4 & 5 – INS must be added as an Erosion Risk and Hazard

Executive Summary

Page iv – Key Recommendations.

1. Agree with the addition of Red Box but DBH should be 40cm. There is data that shows Coolibah at 30cm dbh at 10 years. The reference to appendix 5 is incorrect and should be changed to read appendix 2. Our recommendation that Ironwood should be added has been ignored.
2. OK
3. The reference to Appendix 2 should be changed to read Appendix 5

Welcome the CMA's given some discretion on stem DBH. Retention should be limited to Eucalypts above 40cm on the management area. All other retention should be in the 20% retained in clumps and borders.

Ten Eucalypts per hectare has every hectare fully stocked. To allow the recovery of native perennials to the standard of 50% ground cover and 75% native species. The retention should be capped at two healthy, single stem, mature eucalypts per hectare. The re-establishment of native grasses and ground cover in areas where INS now dominate is one of the principal reasons for rehabilitating these areas. In the Cobar Peneplain, the competition for moisture and nutrients is fierce and this concept needs to be addressed to ensure a healthy environment.

It should be noted that the retained trees in the management area are going to be healthy and a mixture of mature and semi mature trees that will provide an abundance of hollows for nesting. However, it should also be noted that in the retained clumps, borders, wild life corridors and other areas of connectivity that unless these areas are managed and trees have the space they require to grow to maturity, the competition for moisture and nutrients will ensure they will never grow to be mature trees. There are numerous

instances of trees that are over 100 years old with DBH'S OF 75 mm or less.

4. These recommendations have been covered with recommendations made in 3.
5. The requirement to retain an extra 10% is not acceptable. Leave the retention areas as one continuous link not scattered clumps. The retained 2 trees per hectare will supply roost and provide a healthy environment Other points have been covered in 3
6. The whole area of INS must be able to be managed. Paddock scale treatments should be allowed using either Window Pane or Landscape patterns as previously recommended "Best Management Practice" used in the Western Division.
7. NO Comment
8. The Recommendation to allow the use of lucerne is welcomed. The Recommendation should also encompass medics and other desirable non invasive perennials and allow for their introduction after a cropping rotation. The re-establishment of plentiful and adequate ground cover is imperative for the health of our environment. Landholder experience in the Cobar Peneplain has shown other species are critical in returning the system to a healthy and balanced environment. However, because the native ground cover species are adapted to our environment they over time will predominate.
9. Definition should be harvested crops, rather than being defined by the act of cultivation. The recommendation of 3 crops in 15 years should be changed to 3 harvested crops in 10 years. With further cropping events to be approved on a needs basis with inspection. Seasons are unpredictable and erratic. This definition makes allowance for a failed crop. If further cultivations are carried out using minimum till/direct drill, the issue of soil health and degradation is addressed, native species are not overly disturbed and the previous cultivations have achieved INS control. This situation also addresses the need for farm viability.
10. Definition to enable progression to additional areas should be 40% ground cover 51% native species.

When modified step pointing was first used in scientific studies in the Cobar area the findings that support the following statement –
After a run of very good seasons it was possible to have a cover of above 88% of perennial grasses and forbs. However less favoured

areas were as low as 21% perennial grasses and forbs and 13% annuals.

The first published listing of the flora of the Cobar district was that prepared by Archdeacon F.E. Haviland in 1911. Haviland recorded a total of 337 species including 34 introduced species. A more recent listing (Geoff Cunningham pers.comm., 1981) records 399 species of plants from the two 1:100,000 scale grid cells surrounding Cobar, including 74 introduced species and 325 natives. The native species list includes 33 trees, 74 shrubs, 4 vines, and 212 ground cover species. These introduced species are now naturalized and allowance must be made for them when setting the benchmark.

The use of Zero Till has not been addressed. This option should be available to be used at land managers' discretion to assist with soil health and build up of organic carbon.

There is no need for the prescriptions to be so restrictive. The tight prescriptions fail to take into considerations climatic variations and advances in Science and Technology. The restriction of not being able to move past the 1st 20% of property size until reaching the agreed standard is sufficient restriction. The removal of INS and the establishment of grasslands and the improvement in soil health and the consequent improvement in biodiversity, must be the principal aim and there should be less focus on how this is achieved.

Being overly prescriptive will hamper the achievement of these goals. The CMA should be given the responsibility for overseeing and achieving these improvements in environmental outcomes.

The members of this Committee have always believed there is a critical need for properties to be able to secure and have access to what was formerly known as Maximum Allowable Areas. These have been devised and calculated on a scientific basis. They are the absolute, minimum required for the Western Division. Land managers also require a practical INS tool at their disposal.

We have developed a Vegetation Management Plan for areas Invaded by Native Trees and Shrubs in the Cobar Peneplain. The Plan produced with the help of respected scientists has shown we can meet the maintain and enhance test that is part of the Act; however we can get

nothing but red lights when attempting a PVP. We once again request the NRC address this anomalous situation. In Western NSW, particular concerns are the Threatened Species Offset ratios and the Science and benchmarks being applied in the Salinity section. PVP's undertaken in the Western Division require offsets of between 100 to 1 and 11 to 1. We ask why, when in the case of urban development the offsets are 1 for 1.

The Committee once again would like to publicly argue our position on the need to take into consideration socio-economic issues.

Some of the parties to the debate have argued the NRC is outside its Terms of Reference in taking into account the socio-economic issues. We draw their attention to the Native Vegetation Act 2003 as detailed in Section 3 (a) of the Act.

- (a) to provide for, encourage and promote the management of native vegetation on a regional basis in the social, economic and environmental interests of the State.

These parties should reconsider this position. We have always argued that we cannot consider the environment in isolation. Unless you also take into consideration the economic and social issues, we will not have viable and environmentally conscious land managers. The Plan documents the disaster of the "Lock up and Leave" approach. This disaster is what will happen without a sustainable solution both economically and environmentally. The environment will be the loser with continuing loss of habitat, biodiversity, ground cover, and more erosion.

In summary, our comments are made in relation to the Cobar Penneplain and should not be construed as being appropriate for other Regions. The acknowledgment of the problems caused by small stem retention, the recommendation on increasing cropping activities to 3 in 15, the introduction of some discretion for the CMA's, lucerne being approved as part of the solution and the recommendation for no small stem retention on pine are all improvements on the initial recommendations.

The recommendations do not go far enough. There is also a need to allow the use of other non invasive pasture species such as medics and some of the tropical grasses as means of building up soil fertility and

providing forage that allows the pressure on developing native pasture to be minimised and to improve farm unit viability.

Unless the tool is accepted by land managers as offering a practical and economically viable solution nothing will be done. Land managers want to prevent an environmental disaster using their time, energy and limited resources. Give the Land Managers a Go. Guide their efforts, give assistance, provide scientific advice, promote their achievements and help them make it work.

Stuart Mosely
Chairperson – Cobar Vegetation Management Committee