

**REGIONAL COMMUNITY SURVIVAL GROUP**

**“Summerlea”**

**NYNGAN NSW 2825**

18 August 2006

**Submission on Review of EOAM**

We would like to advise our extreme disappointment that yet another opportunity to greatly improve the management of invasive scrub in this central west/western region has been wasted by your committee.

The proposed amendments are barely an improvement on the original INS module, and have consistently failed to truly recognise the management strategies that need to be applied to this region.

A concise list of management strategies that have been prepared by our community are attached for your information. We believe that the introduction of these strategies represents the best path forward for this region, and will deliver the greatest and most equitable improvement to the environment and the region.

Please direct any further queries to myself on 0268322081.

Yours sincerely

*(signed, sent by email)*

Doug Menzies  
Chairman  
“Summerlea”  
NYNGAN NSW 2825

*Attachment: Regional Community Survival Group Management Strategies August 2006*

## **Required changes to treatment of INS**

### **Invasive Scrub management separated from Native Vegetation Act limits**

#### **Moratorium on investigations of alleged illegal land clearing in Western NSW**

#### **100% of areas affected by invasive scrub to have remediation plan**

#### **Minimum retention of 15% on privately owned lands**

#### **Remediation area to be treated as a unit**

#### **A mosaic of open areas and clumps of timber**

#### **Invasive scrub up to 40cm diameter available for treatment**

#### **Flexibility to vary treatment of invasive scrub on a landscape basis**

#### **Flexible rotational cropping/grazing system on a continuing basis**

#### **Availability of non native perennial grasses if required**

#### **Approvals in a timely manner**

### **Invasive Scrub management separated from Native Vegetation Act limits**

Invasive scrub needs to be separated from all other vegetation management restraints – it is a specific problem that behaves in a specific manner that needs to be dealt with specifically. It is not old growth forest, it is not at pre European densities – it is a weed that needs its own management policies that can be implemented without fear of prosecution and harassment from those agencies and green groups that know nothing about the issue. There is no place for politics in this matter. The CMA is better placed to be making local decisions.

### **Moratorium on investigations of alleged illegal land clearing in Western NSW**

This community has campaigned tirelessly since 1997 to have the treatment of woody weeds dealt with in an appropriate manner. To have our land management actions continually judged against legislation that has made a *positive* action illegal is abhorrent to our community. Not only should a moratorium on investigations of land clearing be declared, but a general pardon for landholders on all alleged illegal land clearing in the Western area of NSW.

### **100% of areas affected by invasive scrub to have remediation plan**

Landowners need to be able to consider remediation options for 100% of the degraded site. All retained areas need to have appropriate management strategies applied to improve their condition and increase biodiversity. This could be undertaken in conjunction with the CMA's, and funding available for works. A greater level of care needs to be applied by the State to these areas that they insist are retained.

### **Minimum retention of 15% on privately owned lands**

A minimum retained area of 15% of privately owned land will result in a regional retention rate of 34% - which is acceptable. World benchmarks recommend 10% of privately owned lands be retained. Scientific reports recently released show that farm forestry that is greater than 20% of the catchment becomes detrimental to soil health and water quality. When invasive scrub species dominate a landscape, aren't they doing exactly the same thing? The 15% is a minimum requirement, in actual fact a larger retention rate will result but it will be through the goodwill of the landowner and the property scale assessment on how best to manage the invasive scrub. Retained areas can be grasses – it is all native species!

By being forced to retain 30% of the invasive scrub, as is the current impost by the state government, the problem is not being dealt with in a manner that produces an environmental improvement. There is no shared equity load when it is the landholder alone that has the burden of meeting tree based retention rates to meet carbon sink projections.

### **Remediation area to be treated as a unit**

The land identified for remediation must be able to be dealt with as a unit – not 20% at a time. There is no ‘precautionary principle’ risk here – it is fact that by removing the invasive scrub and replacing it with grasses an improvement in landscape function will result. It is a matter of economies of scale in being able to deal with a whole area to completion.

### **A mosaic of open areas and clumps of timber**

A percentage of area to be retained rather than stem densities per hectare is a more practical approach. The current retention rates are 20 stems per species per hectare plus all trees above 20cm – there can be up to five different species present at any site which would effectively retain 100 stems per hectare plus all of the trees over 20cm: like hairs on a cat’s back! A mosaic landscape rather than a closed woodland is more representative of this area prior to encroachment by woody weeds.

### **Invasive scrub up to 40cm diameter available for treatment**

Invasive scrub up to 40cm diameter need to be able to be removed – the competition for moisture between the trees and grasses is what results in bare soil and erosion. There are so many multistemmed eucalypts as a result of previous ringbarking events that the grasses can no longer establish. They contribute little to the environment, but create huge problems.

### **Flexibility to vary treatment of invasive scrub on a landscape basis**

More flexibility and recognition of management requirements – tools that need to be available for use include burning, clearing with no/minimal disturbance eg poisoning, grubbing, chaining/slashing, clearing with temporary disturbance eg bladeploughing, and clearing with longer term disturbance using tractors and rotational cropping. Once a site is identified for treatment all of these options should be available to the landholder to use at his discretion – so many seasonal and environmental factors need to be taken into account at different stages. This needs to be part of the planning process with the CMA. Flexibility is the key to achieving the best outcomes.

### **Flexible rotational cropping/grazing system on a continuing basis**

Rotational cropping/grazing regime introduced, on a flexible basis. Again seasonal conditions come into effect – the invasive nature of the scrub will determine if a change of timeframe is required. An example of a cropping/grazing cycle is say 2 years in 8 ie 2 crops followed by grazing for 6 years, however in the first recovery stage of heavily encroached lands, a rotation of perhaps 3 in 5 or 6 may be required to control regeneration of scrub. Cultivation and cropping is a low impact method of maintaining this open landscape once the remediation work is done, and is extremely sustainable. Cultivation is currently restricted to only 2 years in the first 15 years then no further cropping. It makes no sense to recognise the benefits of cultivation in restoring these landscapes and then deny the landholder the opportunity to use this method of management on a continuing basis. Invasive scrub is just that – it keeps coming back and can be effectively controlled with a cropping/grazing rotation where flexibility is retained to adjust to seasonal conditions. The cropping rotation is absolutely essential to improve the health of the soil structure and fertility by removing the domination of the woody weed root systems and stimulating the generation of soil biota. Degraded soil under woody weeds will show organic carbon levels of less than 0.35% whilst average to good soils under grass will show organic carbon levels of 0.85% - more than twice as much. Soils are by far the best carbon sequesters but can only do this in a healthy state. Therefore healthy soils = greater benefit to the greenhouse gas issue, and poor soils contribute nothing.

**Availability of non native perennial plant species if required**

Landholders must be able to introduce exotic plant species as well as natives. Because the landscape is so degraded of grasses it will be some time before the soil health improves through the cropping cycle, and by introducing lucerne, medics and clovers that act as companion plants to the native grasses greater and faster improvements can be achieved. The native grasses will eventually dominate, and will quite happily survive the cropping rotation and return in the first year of pasture and continue to establish and flourish.

**Approvals in a timely manner**

Approvals on these restoration plans must be made in a timely manner. As they are prepared in consultation with the CMA's, it should only take a short time, a matter of weeks not months, to approve. Twelve years has been lost to indecision and bad politics, it is now time to let landholders get back to work and restore these landscapes.

In having these changes introduced, landholders are still compromising on the best possible outcomes for their landscape, but are prepared to contribute to the improved environmental outcomes of the region, if an improvement is achieved. By continuing to lock up this heavily degraded land only further loss of species and biodiversity will result and the great sacrifice being forced on farming families by the government and the greens is really for nothing.