



14 January 2011

Environmental Outcomes Assessment Methodology
Natural Resources Commission
GPO Box 4206
Sydney NSW 2001

Dear Sir/Madam

Re: Comments on the Proposed Amendments to the Environmental Outcomes Assessment Methodology.

Namoi CMA has reviewed the proposed amendments to the Environmental Outcomes Assessment Methodology (EOAM). The timing of the request for comments during the Christmas and New Year shut down period allowed only a superficial analysis of the proposed (EOAM) changes. Please find our comments summarised below:

Streamlined assessment:

- One of the aims of the amendments is to streamline assessment processes to reduce administrative processing time. It is difficult to see where these time savings are as the filter criteria seem to require running the existing assessment tools to see whether the assessment can proceed under a streamlined process.
- Many of the processes involved that can take a lot of time during the assessment process will not be fixed by the proposed EOAM amendments. This includes landholder negotiation, mapping issues such as slow refresh rates and unstable mapping, data loss and re-mapping.
- Other opportunities to streamline processes could be found by reviewing and amending certain aspects of the existing Chapters and greater specialist training of PVP staff.

8.3 Definitions:

- Clumps: A clump of trees can range from .25 ha to 10 ha. In our opinion 10 ha is too large and should be reduced to 5 ha.
- Not Viable or low viability: The terms 'substantially degraded' and 'substantially outside benchmark' are subjective and should be better defined.

8.4.1 Native Vegetation Categories:

- Category 1 Native Vegetation in low condition: A list of examples of native vegetation in this condition would aid clarity.
- Category 2 Clumps: A note highlighting that this category refers to clumps of vegetation that are not overcleared vegetation or Mitchell landscape types or Threatened Ecological Communities (TEC's) would aid clarity and avoid the need to look up multiple definitions.

- Category 3 Derived grasslands are included: However why not also include derived shrublands and woodlands?
- Category 4: It is unlikely this category will be used in the Namoi Catchment as we only have 2 vegetation types 10% or less cleared.
- Categories 5: Two hectares: The intent of this was for it to be a 'one off per property' but this is not mentioned in the draft. Is it 2 ha of land or 2 ha of trees? The filter criterion prevents clearing of Threatened Species unable to withstand a loss but is silent on critical habitat, endangered populations and TEC's limited in extent. Is it intended that 2 hectares of these categories be cleared? The Namoi CMA would not support this category if it allowed clearing of critical habitat, endangered populations and TEC's limited in extent. This category will change current red lights to green lights, which we understood the current amendments were not supposed to do. Notwithstanding the above, the Namoi CMA would support this category providing the clearing is a one off per property and the 2 hectares of land does not allow clearing of critical habitat, endangered populations and threatened ecological communities limited in extent. This category should increase our ability to assist landholders through the assessment process and decrease the frequency of landholder creativity in the application of RAMAs. The "one off use per property" avoids cumulative impact.

8.4.2 Filter Criteria:

- 8.4.2(c)(v) – Namoi CMA does not have accurate data on the area of many of the Namoi vegetation types to determine if extent is less than 1000 ha. This filter criterion would require determination of areas for all but our most common vegetation types, which would be difficult without extensive data collection or refinement of existing mapping. This process will take time, either requiring a delay in the deployment of Chapter 8 until this data is available or a delay in implementation for some of our vegetation types until the data is available.

8.4.3 Offset requirements:

- 8.4.3.1(1C)b) - this action should also allow for natural regeneration of trees.
- 8.4.3.1(1C)c) - if trees are planted or sown it should be specified that they must be from seed of 'local provenance'.
- 8.4.3.2(1A)b) - there should not be a reference to "hollows" as management actions referring to "hollows" are to allow for loss of fauna habitat, which is not required under this offset condition as fauna threatened species "do not occur or are not predicted to occur on the land on which broadscale clearing is proposed".
- 8.4.3.2(1B)b) - same comment as for 8.4.3.2(1A)b).

In concluding, should you have any questions/queries in regard to our comments please contact Dennis Boschma, Catchment Coordinator – Native Vegetation on 0429 159 290.

Yours sincerely



Bruce Brown
General Manager
Namoi Catchment Management Authority