

River Red Gum Forests Assessment  
Natural Resources Commission  
GPO Box 4206  
Sydney NSW 2001  
Facsimile: 02 8227 4399  
[forests@nrc.nsw.gov.au](mailto:forests@nrc.nsw.gov.au)

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Dear NRC,

**Comment on NRC Preliminary Assessment report  
of the Riverina Regional Forests Assessment**

I wish to comment on the NRC Preliminary Assessment report of the Riverina Regional Forests Assessment released at the end of September 2009.

I am pleased that the NRC has been asked to conduct an assessment of the Riverina Red Gum forests on public lands. This has the potential to bring objectivity to the issue and to provide independent and scientific advice to the NSW Government before it makes a decision on improving the conservation of the area.

In general, the report needs to be significantly improved. The key areas where the NRC was in the position to provide much-needed independence – reviewing the nature and impacts of the forestry industry – it appears to have been done poorly.

The Preliminary Assessment Report fails to properly provide an accurate overview of the state of the red gum forests and the forestry industry. The sections on the state of the ecological values of the red gum and woodland forests and the examination of the forestry industry operating in the area were inadequate, skewed to forestry interests and deficient. The assessment appeared to rely heavily on the Forests NSW EIS prepared in 2009 and did not draw on other information from DECC, scientists and conservation interests on the real state of forestry and their impacts on forest-dependent fauna.

I do understand that time was short and this limited the ability to gather and analyse the information available for the preliminary assessment.

The sections on the problems of lack of water and the impacts of climate change, within the constraints you were operating under, were good.

I disagree with the criteria used to determine the health of the red gum forests. This simplistic approach ignores the requirements of the animals dependent on the red gum forest for survival and the long-term retention of key habitat elements. It also does not properly consider the regional importance of the area to individual species in an area that is already heavily cleared.

I concur with the views of NPA that find the preliminary assessment is lacking in the following areas:

1. The assessment is markedly inadequate as far as forest ecology and systematic conservation planning is concerned. There has been no NRC has

no scientific assessment of the conservation values of River Red Gum forests in the study area. In our view, it does not constitute a Forest Assessment.

2. With regard to forestry matters it is an unbalanced report with an apparent pro-logging slant.
3. It does not provide any scientific assessment of the impacts of logging and other activities on forest ecology and does not refer to relevant literature.
4. It does not review the national reserve criteria and how they will be met or provide a basis for any form of systematic conservation planning.
5. It does not properly address 99.9% of biodiversity in the forests, restricting itself to a handful of threatened species, without considering biodiversity surrogates or regionally significant species.
6. It overlooks the relevant policies on Climate Change and Biodiversity Adaptation, and selectively quotes the CSIRO (2008) report so as to avoid the key finding – that large protected areas are vital to the survival of species in a warming world.
7. It does not identify refugia, corridors and linking habitats in the region.
8. It does not apply or mention the precautionary principle
9. It does not canvas the outstanding and well-recognised conservation benefits of National Parks.
10. It fails to address the Federal EPBC Act 1999 in any substantive manner, or to indicate how the legal requirements of that Act will be met.
11. It does not provide an assessment of the adequacy of environmental prescriptions on logging and fails to make any comparison with prescriptions applied in other regions.
12. It makes no attempt to quantify the economic benefits from National Parks.

This assessment report must be republished with these issues rectified. This will ensure that there is a credible information base on which to provide recommendations to the NSW Government and to make decisions on the future of the area. The assessment can also serve as a valuable reference document for subsequent decision-making by all government bodies and landholders.

Providing water to the red gum forests will be a difficult long-term issue and will place the forests under on-going stress. This large challenge should not be used as a reason to delay reform to unsustainable and damaging forestry practices taking place in the forests or suggest that, due to this difficulty, some areas may appear beyond hope and can be sacrificed to the forestry industry.

All areas of public land can make a vital contribution to the long-term ecological health of the area. While vegetation structure and make-up may change in response to altered flooding and river flow regimes, these areas in transition will still be important for conservation. Permanent protection must be considered for these areas in the context of improved ecosystem resilience in a heavily cleared and modified landscape with few areas under reservation.

The need for more water for the red gum forests and other water dependent ecosystems should also be stressed. It is not sufficient to accept water allocations under current government policies. If it is required to provide more water to the forests than what governments have already committed to, then that should be more clearly stated.

I believe that the case for large new national parks for the red gum forests of the Riverina is strong and well supported by NSW and Federal government policy, scientific evidence and the long-term economic benefits that will flow to the local area.

I support calls for NRC to recommend:

1. Extensive new Red Gum National Parks created from the overwhelming majority of public Crown timber lands of the Riverina, complemented by targeted purchases of private land because:
  - a. Red Gum is a vulnerable ecosystem that needs a 60% minimum reservation target
  - b. Red Gum forests are vital refuges for plants and animals in a rapidly warming world
  - c. National Parks are crucial to ecosystem resilience
2. Aboriginal ownership of new National Parks wherever sought by Traditional Owners
3. Much improved environmental water flows to ensure the health of Red Gum Forests into the future
4. A fair restructure package for individuals and businesses affected by the changes.

Yours sincerely



Andrew Cox