

From: [Coral Robinson](mailto:Coral.Robinson@nrc.nsw.gov.au)
To: forests@nrc.nsw.gov.au
Sent: Friday, October 23, 2009 4:53 PM
Subject: Assessment of River Red Gum Forests

Forests Assessment
Natural Resources Commission
GPO Box 4206, Sydney NSW 2001
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Dear Sirs,

Re: Submission on NRC's Preliminary Assessment Report on River Red Gum Forests

I refer to the preliminary assessment of the River Red Gum forests of south-western NSW.

It is clear from this assessment that these internationally significant areas are currently facing extreme stress. The NRC's report paints a bleak future for these forests, predicting that a number of areas will not survive under their current management. The report also discusses the importance of these areas, within a landscape context, as the last remnants of vegetation in one of the most heavily cleared landscapes in the country.

However, I submit that the NRC's assessment is not a credible, scientific assessment as it neglects to address a number of key issues, such as examining the impact that logging is having on the forests and addressing key, nationally-agreed conservation criteria.

The report fails to discuss any negative impacts associated with current logging operations and ignores evidence from other regions, in particular the findings of the 3-year Victorian Environmental Assessment Council's (VEAC) study into Victorian river red gum. For Victoria, where logging was of a much lower intensity than that currently occurring in NSW, VEAC found that "past and current uses and management are seriously affecting the long-term viability of the River Red Gum forests and wetlands".

The terms of reference for the assessment state that the NRC should take into regard nationally-agreed criteria for a comprehensive, adequate and representative (CAR) reserve system (JANIS criteria). The assessment has not achieved this. What the report very clearly shows, is that the forests are a vulnerable ecosystem, facing extreme water stress. Nationally-agreed criteria require that, as such, 60 percent of their remaining extent should be preserved.

While I support the NRC's assertion that reserve design must take into account resilience to climate change, this should always be complementary to, and not replace, CAR reserve criteria, which is not addressed in the preliminary assessment.

Therefore, based on the following:

- River Red Gum is a vulnerable ecosystem that needs a 60% reservation target;

- River Red Gum forests are vital refuges for plants and animals in a rapidly warming world; and
- National Parks are crucial to ecosystem resilience

I strongly urge that for the long term health and protection of these precious but vulnerable forests, the NRC recommend extensive new Red Gum National Parks and improved environmental water flows.

Yours sincerely,

Coral Robinson