

Ms Elizabeth Makin
Thursday 22nd October, 2009

Forests Assessment
Natural Resources Commission
GPO Box 4206
Sydney NSW 2001

To Whom It May Concern,

I am writing with regards to the Riverina Bioregion Forest Assessment of River Red Gums and Woodland Forests. I find this Preliminary Assessment to be regretfully inadequate for a variety of reasons – of which I shall mention but a few. I strongly urge that these inadequacies are taken into consideration when the final assessment is made and that, as a consequence of so doing, the Natural Resources Commission recommends extensive Red Gum National Parks across all State Forests of the bioregion. I would also request that these National Parks should be owned and managed, as much as is possible, by the traditional indigenous owners of the areas in question.

In terms of the assessment's inadequacies, I would make several key points. Firstly, the scope of the document is limited to being a water and socio-economic assessment, consequently failing to offer the required insight into the environmental value of forest ecosystem conservation. While the economic assessment itself does point out the significantly decreased viability of forestry operations in the bioregion, it fails to take into account the economic cost of not protecting and conserving these valuable ecosystems.

In terms of the scientific analysis, the preliminary assessment is, again, severely limited in that it completely ignores the significant amounts of literature which demonstrate the disastrous impacts of logging on forest ecology. With regard to the studies it does take into account, the assertions from Forests NSW that logging and clear patch-felling have positive effects on the forests appear entirely without proof or referencing. Furthermore, the assessment fails to understand and realise a key point of the CSIRO's 2008 report; that large protected areas are vital to the survival of species in a changing climate. From a legal standpoint, the assessment fails to substantively address the requirements of the *Environmental Protection and Biodiversity Conservation Act 1999 (Cth)*, despite this being required by the initial Terms of Reference 1(b).

In short, the Preliminary Assessment, while not being completely without value, appears to be limited in scope and rigour, with little concern for its scientific or legal requirements or, indeed, for the precious and fragile biodiversity of the River Red Gum and Woodland Forests in the Riverina Bioregion. I therefore urgently request that the Natural Resources Commission takes these gross inadequacies into consideration when it makes its final assessment and, consequently, recommends that extensive River Red Gum National Parks are created. In doing so, it would also be important to provide a fair restructure package for affected individuals and businesses; provisions for traditional owners to manage these new National Parks and to ensure improved environmental water

flows so as to ensure the long term health of the entire region. Indeed, not only the environmental but the economic, social and cultural health is dependent upon this decision being made.

Yours Sincerely,

Elizabeth Makin