

**Submission To Natural Resource Commission Re:
Inadequacies Of NRC Redgum Forests
Assessment Report (2009)**

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MAJOR CONCERNS WITH THE NRC (2009) REPORT

1. It does not apply or mention the precautionary principle and doesn't canvas the outstanding and well-recognised conservation benefits of National Parks.
2. The assessment is markedly inadequate as far as forest ecology and systematic conservation planning is concerned. In our view, it does not constitute a Forest Assessment.

A lack of comprehensive knowledge of the biology and related habitat requirements of most redgum forest dwelling vertebrate and invertebrate species, and in particular state and commonwealth Endangered listed species, appears most pointedly in the current NRC report and therefore **the science behind the continuation of logging in these forest ecosystems is most certainly grossly flawed.**

As a committed conservationist, I am aware of similar inadequacies in the science used by the state government to justify their trashing of our region's fragile high country forest ecosystems simply for the maintenance of jobs and financial prosperity to a select few in the community, at great, and I would argue, unjustifiable and unsustainable cost to the environment.

I would further argue that if the state government does not have a comprehensive knowledge of species and therefore an absence of knowledge of the potential impact of logging upon such species and their habitats and the long-term effects of totally unnatural timber harvesting impact upon forest ecosystems, a fact which is patently clear to us and other thinking members of the community, then how can they, the government and other pro-logging lobbyists, allow a continuation of such destructive activities which, I believe, will result in the eventual increase in extinction pressures on an array of forest dwelling species.

My view is that the NRC Report is a further example of the failure of the government and its 'lackies' to provide appropriate forest management strategies for already under great environmental stress redgum forests along our major southern river systems – the continuation of current forest management strategies under Forests NSW administration will lead to certain further deterioration of these ecosystems and that protection of these ecosystems under national park status can be the only appropriate strategy for future forest management.

3. With regard to forestry matters it is an unbalanced report with an apparent pro-logging slant.
4. 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.
5. 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.
6. 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.

7. 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.
8. It does not identify refugia, corridors and linking habitats in the region.
9. 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.
10. 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.
11. It makes no attempt to quantify the economic benefits from National Parks.
12. Whilst Aboriginal cultural heritage is consistently and incorrectly relegated by state government forest managers as an issue separate to forest ecology, the NRC Report fails to acknowledge or make recommendations regarding the involvement of and consultation with the relevant original forest managers, the Aboriginal people of the region.