



Bird Observation & Conservation Australia

Incorporating Bird Observers Club of Australia

Helping today's birds survive tomorrow

Forests Assessment
Natural Resources Commission
forests@nrc.nsw.gov.au

2 November 2009

Dear Commissioners

Preliminary Assessment Report on the Riverina bioregion Red Gum Forests

Bird Observation & Conservation Australia (BOCA) welcomes the opportunity to comment on the Preliminary Assessment Report for the river red gum forests (the Report) and appreciates the opportunity to make a late submission.

BOCA supports the submission made by the Echuca and district branch of BOCA. The submission commented on management issues such as grazing in red gum forests and made specific recommendations regarding areas of red gum forests that should be set aside as conservation reserves. The present submission is limited to a more general discussion of the Report and the assessment process.

BOCA is disappointed that the Report is limited to the first Term of Reference (TOR) and that there appears to be no opportunity to comment on the Commission's recommendations (TORs two and three) before the final assessment report is presented to the NSW Government.

BOCA believes that the Report lacks rigor and provides a biased, industry focused perspective of the Riverina red gum forests. It provides a static audit of the forests 'assets' rather than a dynamic assessment or understanding of the forest's ecology. The Report does not provide a solid scientific basis for assessing the ecological and conservation values of the forest or for determining areas that should become part of the national reserve system. It is well recognized that an effective conservation reserve system must include linkages that allow species to move across the landscape and refugia to which species may retreat during periods of environmental stress such as drought. These features have not been identified in the Report.

BOCA urges the Commission to address these issues and submits that the final assessment report must include a network of large national parks and conservation reserves that:

- meet the national reserve criteria for a comprehensive, adequate and representative reserve system for the Riverina red gum forests; and
- provide ecological linkages to allow for the movement of species in response to climate change.

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Furthermore, the report must identify opportunities to improve the ecological health and resilience of the red gum forests, particularly through improved environmental flows to the red gum wetlands. The NSW Government must commit sufficient funds to manage the red gum forests for the ecological and conservation values of the entire forest ecosystem, not just the commercial value of a single species. This must include funding for research into the ecology of the forests, including the impacts of present and future management practices on forest ecosystems.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Hunter', written in a cursive style.

Richard Hunter
Chief Executive Officer