

**From:** Brian and Judith Wild [mailto:bjwild@draget.com.au]  
**Sent:** Saturday, 17 October 2009 10:21 AM  
**To:** Avtar Singh  
**Subject:** Submission on Preliminary Report: Red Gum forest assessment

Dear Sir/Madam,

Please find attached a short submission on the NRC Preliminary Report: **River Red Gum forest assessment**, as submitted by the High Country Conservation Alliance Inc.

Would you please acknowledge receipt.

Thank you.

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President HCCA Inc.

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Submission on  
the Natural Resources Commission Preliminary Report on  
**River Red Gums**  
of 30 September 2009  
from  
HIGH COUNTRY CONSERVATION ALLIANCE INC.

The High Country Conservation Alliance Inc. (HCCA Inc.) makes a number of points about the Natural Resources Commission Report on River Red Gums released on 30 September 2009 as follows.

Despite the unpleasant prospects for southern Australia, we believe this report makes significant admissions about the likely effects of Climate Change, and the likelihood of the decline in average annual rainfall within the relevant upper Murray and Murrumbidgee catchments. This sets new and threatening parameters for these river valleys, their human communities, their natural ecological systems, and the remnant River Red Gums and forests. It must be anticipated that these trees and forests will be placed under even greater stress in the future than they have been subject to up to the present. The Report also recognises the likely scenarios surrounding competing demands for water from these sources and their likely impacts on the health of the remnant River Red Gums and forests, and the likelihood that (very severe) river regulation will almost certainly exacerbate these problems.

Recognising these important features of the Preliminary Report, we draw attention to a number of points we would like to see recognised before the final report is presented.

- While this Preliminary Report recognises the competing interests of logging and environmental needs, it appears to manifest a bias towards logging. We, too, recognise these competing interests. However, while we recognise the imperative to consider human interests, we would stress that if humans destroy their natural resource base, their long-term future is even more seriously threatened, and there is "no way back" if we destroy resources which take so long to reach maturity. In other words, we should place long-term environmental values well ahead of short-term economic values such as logging, which are not sustainable.
- In this regard, the Report makes no real attempt to objectively assess such safeguards as are placed upon the activities of logging operations.
- We suggest this Report does not examine at all adequately, the very complex nature of forest ecologies, nor the huge variety of plant and animal species and their interrelationships. It should be clear to anyone familiar with ecological science that the removal of any one species within an ecological fabric can have many and far-reaching consequences. We suggest that it is difficult to imagine any kind of human interference in terrestrial ecological systems with more, and more catastrophic, impacts on plant and animal species than logging. Yet scant attention is paid to this problem in general, and very inadequately in this Report.
- We suggest there is a deficiency in this Report in that it lacks any real or rigorous ecological assessment of the major River Red Gum forests under consideration.
- In relation to the foregoing, we suggest the Report does not appropriately investigate the long- and short-term impacts of logging on natural ecosystems, and (like logging operations in the southern New South Wales high country) pays no attention to the effects of logging on the very significant amounts of carbon stored in forest soils and so-called forest "waste", with potential to be released as CO<sub>2</sub>.

- It seems to us that this Report does not pay sufficient attention to the Environmental Protection and Assessment Act, to how its requirements will be observed or policed. Consequently, we consider it to be negligent to consider certain consequences of logging upon local economies weighed over and against environmental/ecological considerations when there is no investigation into whether logging can comply with our own mandatory environmental laws.
- In relation to these ecological issues, it is surprising that this Report does not acknowledge, nor recommend the application of, the precautionary principle. This is an extremely significant omission in a Report of this nature, which deals with issues whose outcomes are so uncertain and potentially so permanent.
- We point out that it is made clear in the writings of the earliest explorers, including Captain Charles Sturt and George Bennett, that at that the Murrumbidgee and Tumut River floodplains were effectively continuous forest or woodland consisting principally of "flooded gum", that is mainly River Red Gum, while the water courses were lined with the darker foliage of the River She-Oak (*Cassuarina cunninghamiana*). This evidence shows that River Red Gums were then, and remain, forest or woodland trees. They are not naturally isolated ("paddock") trees as they now appear. From our research and observations, as isolated trees River Red Gums River are subject to a range of pernicious effects including severe insect attack, severe wind damage, and impacts from cattle grazing. This is obvious in the poor condition of many of these trees and their loss of significant foliage: in many cases up to 75% or more. Consequently, we would urge that in order to adequately protect and preserve this species in the NSW/Victoria riverina, it is essential to preserve large areas of them as forest/woodland. The most secure way of doing this is by the establishment of appropriate reserves or national parks. We emphasise that this need is very urgent, and we therefore support the NSW National Parks Association campaign for the establishment of a number of River Red Gum national parks in this area.

While this Report gives us some hope that all relevant factors will be taken into account before a final determination is made, we would strongly urge the relevant authorities to take a consistently objective approach to environmental, social, and economic factors.

Brian Wild

President, HCCA Inc.

15 October 2009