



I N L A N D  
R I V E R S  
N E T W O R K

October, 2009.

Forests Assessment  
Natural Resources Commission  
GPO Box 4206  
Sydney NSW 2001

Email: [forests@nrc.nsw.gov.au](mailto:forests@nrc.nsw.gov.au)

Comment: River Red Gum Forest Preliminary Assessment Report

The Inland Rivers Network is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. Since 1991 the Network has advocated for the conservation of biological diversity in these environments, the maintenance of essential ecosystem functions and the restoration of degraded habits. IRN has been a strong advocate for wetland conservation in keeping with the obligations under the Ramsar Convention to which Australia is a signatory.

The Red Gum forests of the Murray Darling Basin were an issue of specific concern by IRN around the time of the most recent Ramsar meeting (CoP10) held in Korea, at which the Network was represented by the then Coordinator Amy Hankinson.

Accordingly IRN welcomed the 2008 decision by the Victorian government to protect an extensive area of Red Gum forest along the River Murray and wrote to the NSW Premier urging complementary action to protect the NSW Red Gum forests.

IRN furthermore was pleased when ultimately there was a decision to conduct an assessment of the forests of the Riverina through the NSW Natural Resource Commission, being aware that forestry activities in this inland bioregion have up until now not been subjected to a full and proper Regional Forest Agreement scrutiny. Accordingly IRN appreciates the opportunity to submit comment on the Preliminary Assessment Report.

IRN particularly welcomes the recognition, as per the Terms of Reference, of the need to consider water management and flooding requirements to sustain the forests and identified values and the need to take into consideration the projected impacts of climate change.

The Ramsar Convention's mission is "the conservation and wise use of all wetlands through local and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world". With this in mind IRN welcomes the specific acknowledgement of the Australian Government's Ramsar Convention obligations (p12 of the Assessment Report)

Inland Rivers Network Inc., Suite 504, 32 York St., Sydney, NSW 2000  
[coordinator@irnsw.org.au](mailto:coordinator@irnsw.org.au)

IRN recognises that sustaining the health of the Red Gum Forests and wetlands for the long term depends on sustaining the ecological processes of the region, and therefore the importance of establishing and maintaining a wetting and drying regime as close to the natural flow pattern and volume as is possible.

It is disappointing that in the section 2.4 – History of forest development - under 2003 Ramsar (page 28) listing is written up in a way that appears to imply silvicultural ‘stand improvement’ activities are justified by the fact that a part of the area has nevertheless been listed as a wetland of international important, rather than that this was accepted despite the modification of the natural habitat and loss of hollow-bearing habitat trees.

There also appears to be some confusion in the way that the current protracted period of low rainfall is inferred to be the major cause of the current decline in ecosystem health, rather than clear acknowledgement that this period of extended low rainfall is occurring on top of protracted reduction in major and minor flooding due to river regulation and upstream extractions/diversions.

It is also disappointing that section 3 on current forest extent, condition, management and values, while acknowledging the stressed state of river red gum forests, fails to clearly articulate as a value the maintenance of ecosystem processes. Yet unless the underlying ecosystem processes are sustained the socio-economic values will be undeliverable.

IRN was profoundly disappointed by the NSW Regulated River Water Sharing Plans as finally promulgated, and accordingly welcomed moves for a basin wide planning process which would allow for a more comprehensive and inclusive approach to managing the surface and subsurface waters and wetland systems of the Murray Darling Basin. This much-needed new approach is now underway through development of the Murray Darling Basin Plan under the auspices of the Murray Darling Basin Authority. It is increasingly accepted that although difficult decisions will be required to implement the necessary reduction in water diversions and extractions, this will be essential to deliver sustainability. In the short term IRN stresses the importance of ensuring that no actions are recommended or undertaken through this RFA process that would prejudice achievement of the overarching objectives the Basin Plan.

In the light of the current knowledge and predictions of climate change, it is particularly important to factor in the implications for natural systems, which reinforces the need to take a precautionary approach. Knowledge of the connectivity of ecosystem processes is improving, although far from adequate, which yet further reinforces the need to apply the precautionary principle.

Yours sincerely,

Anne E Reeves, OAM,  
Hon. President,  
0407 210 608