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To:

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RE: Submission on Red Gum Forests Assessment Report

The Nambucca Valley Conservation Association (NVCA) would like to make this submission on the preliminary assessment report. In general we have found that the assessment fails to provide a systematic and comprehensive assessment of the biodiversity values of the River Red Gum and fails to apply national reserve criteria to support systematic conservation planning. As a result we feel that the report has been unsuccessful in meeting the Terms of Reference, has failed to accommodate latest findings and policies on climate change adaptation and has failed to properly assess and plan for the design of a world class and resilient NRS in the Redgum.

NVCA would like to make the following points about the major issues and concerns with the assessment.

1. The assessment provides an inadequate scientific assessment of the conservation values of River Red Gum forests in the study area.

The approach used to identify environmental values is lacking real scientific worth. There has been little analysis of the mapped data and results of surveys to identify those areas that are critical to conservation planning including high value fauna habitat areas, landscape linkages, habitat corridors and climate change corridor values.

For example the assessment is only structured to address a small percentage of biodiversity attributes of the forest and restricts itself to handful of threatened species. There has been no comprehensive assessment of other biodiversity indicators or surrogates. This severely undermines a proper assessment of the habitat values of Red Gum. The assessment addresses Redgum dependent species and the NVCA appreciate the acknowledgment of those species. However, to restrict the assessment to consideration of these species, whilst ignoring other species who intermittently rely on Redgum communities is a misrepresentation of the overall habitat values of Redgum and the delicate ecology of these fragile ecosystems. A proper assessment and classification of regionally significant species is required to get a holistic picture of the conservation threats and requirements.

2. *There is no consideration of the national reserve criteria – this should underpin strategy conservation planning.*

The terms Comprehensive, Representative and Adequacy are all mentioned and described however, there is no clear criteria on what constitutes these reservation features for the River Redgums. There is much reporting on the current scenario of hectares cleared, area reserved and distribution remaining for vegetation communities. However, the assessment fails to identify what is actually required to plan for a CAR reserve in the area. The NVCA appreciate the use and reporting of Bensons community classifications and their attributes within the study area, however there is no classification of their conservation status to determine how to implement the JANIS criteria. JANIS is not a historic document. JANIS is the key criteria that the government should be applying to systematically deliver a world class CAR reserve network in Australia. That fact has not changed.

Red Gum ecosystems meet the definition of vulnerable ecosystems under the JANIS criteria because they are '*subject to continuing and significant threatening processes which will reduce their extent*', in the form of water stress and dieback. As vulnerable ecosystems they warrant a target of 60% of their current extent under JANIS.

There has been no mapping of special environmental values such as refugia, corridors and linking habitats that are critical to the planning and establishment of a CAR reserve network. This illustrates the lack of analysis and scientific assessment that underpins the failures in this report.

The NSW and National Biodiversity and Climate Change plans require that there is reservation of natural refuges and habitat linkages to enable adaptation. Due to their role as key refugia and major corridors, Red Gum forests are undoubtedly the highest priority ecosystem for climate change adaptation in the region. The JANIS criteria require additional targets for natural refugia, remnants in fragmented landscapes and high quality habitats for fauna, as well as requiring reserves large enough to sustain the integrity and viability of fauna populations.

Specifically, the NSW Biodiversity and Climate Change Adaptation Framework and the National Biodiversity and Climate Change Action Plan, plus the findings from the CSIRO report on Climate Change and the National Reserve System, require reservation of natural refuges and habitat linkages, and identification and protection of ecosystems and species that are vulnerable to climate change.

3. *No acknowledgment or application of the precautionary principle*

The report on the Directions for the National Reserves System states that "*The absence of scientific certainty is not a reason to postpone measures to establish protected areas that contribute to a comprehensive, adequate and representative national reserve system*". The same principle is set down in the NSW Biodiversity Strategy and the National Forest Policy Statement.

In the light of all the lack of information provided in the assessment regarding conservation status, biodiversity habitat features, refugia and corridor values, there appears to be no application of the precautionary principle. This is particularly unsatisfactory in the light of climate change and the now critical need to buffer biodiversity from the rate of change and

the possible negative impacts.

4. *The impact of logging on River Redgums and other forest types has not been considered or addressed.*

There is no data or analysis that shows the impact of logging on River Redgum forests. The report appears to have a pro logging slant and discusses all of the sustainable forestry management practices. However, there is no evidence on which to base these claims and there is no discussion on the negative impacts of continued logging on this fragile ecosystem.

The assessment does not make any reference to existing data on the impact of logging. It is shown that the cumulative impacts of logging over time are severe. The Red Gum EIS found that logging decreases the number of hollow-bearing trees from 25 per ha down to a mean of 11 per ha and as little as 3.3 per ha. The FNSW data shows that logging has reduced the density of hollow-bearing trees from 56% to 87%. This represents a massive environmental impact as hollow-bearing trees are one of the most vital habitat resources in these forests. The EIS also indicated that older trees are subject to higher rates of decline due to water stress. Therefore, it can be concluded that the cumulative impacts of logging and stress on the older elements of the stand are likely to be severe. The Federal Department of Environment, Water, Heritage and the Arts has recently confirmed that Red Gum patch-clearfelling has a significant environmental impact.

The assessment fails to evaluate the adequacy of logging prescriptions and their impact. There has been no comparison of Redgum logging prescriptions compared to other prescriptions in the region. This hides the fact that the Redgum logging prescriptions are some of the worst in the state. This is very unfavourable given the vulnerability and existing threats of this fragile ecosystem.

5. *The report fails to address the legal requirements of that EPBC Act 1999.*

Current logging practices are illegal under the EPBC. The assessment is required to meet the requirement to develop an approach that addresses these issues and provides a clear legislative mechanism that protects against illegal logging. The assessment fails to do this. There is no discussion of what legislative process of mechanism will be used to meet the requirements of the EPBC Act. No indication of what path will be made in relation to a conservation strategy or a conservation agreement. This needs to be addressed and the proposed approach presented.

6. *The assessment overlooks the relevant policies on climate change and adaption of biodiversity and fails to implement some of the key aspects to these policies. Fore example; The NSW Adaptation Strategy for Climate Change Impacts on Biodiversity specifies that:*

"Future reserves thus need to be designed to protect large landscape areas, as well as climatic refuges, to provide opportunities to maintain diverse species and habitats.

The assessment has not identified climatic refugia or the value of Redgum as a climate refugia. Furthermore the above-mentioned ploicy on Adaptation indicates the values of

natural areas and states that

'prevention of further fragmentation and degradation, and increased linkages across the landscape are acknowledged to be effective measures for the conservation of biodiversity that should be incorporated into natural resource planning.'

The assessment has failed to identify linkages, corridors and to recognize logging as an impact that fragments the habitat values for species adapting to climate change.

The policy also discusses the preferred approach to developing adaptation strategies and states the following points:

- *developing conservation planning tools that model the effects of climate change and greenhouse gases on ecosystem dynamics and species responses*
- *identifying gaps and priorities for new reserves*
- *establishing regional and continental scale networks of protected areas*
- *identifying refuges for incorporation into reserves*
- *identifying locations where buffers, landscape linkages and reserve expansion are needed to maximise conservation of biodiversity.*

Refuges can protect small, geographically restricted or remnant populations, and may support species expansion in new climatic conditions. Buffers may significantly increase ecological resilience, minimise threats and maintain viable populations of species".

There has been no proper scientific assessment to implement these conservation strategies for the River Redgum forests.

It is unfortunate that the assessment uses selective use of CSIRO (2008) quotes to support some of the bias in the assessment . Key findings in the CSIRO (2008) report are omitted from the assessment. CSIRO (2008), in their review on the *'implications of climate change for Australia's protected are network'* concluded that, collectively, well-planned and managed comprehensive reserve networks will present a very strong buffer to the effects of climate change, helping significantly to minimise the loss of biodiversity. They state that *"Under the changes and uncertainties of climate change, especially in combination with other human pressures, protecting large areas of habitat and a diversity of habitats both become even more important for conserving species..... Species in areas facing greater levels of change (e.g. significant changes in seasonal growth patterns or landscape hydrology) may be in greater need of additional habitat protection"*. The note that *'while ecosystems and species in any one area will change over time, the greater the total area of habitat available, and the more diverse that habitat, the greater the number of ecosystems and species that will be able to survive'*.

7. There is no economic assessment of the value of National Parks in the area. A report to prepared by independent economists for NPA and TWS evaluating the socio-economic situation in the River Redgums shows that:

1. Creation of large new National Parks would generate \$100m in economic activity p.a.
2. The non-use value of the areas logged each year to the community of NSW is \$17.7m,
3. The tourism industry generates \$797.5m annually in tourism expenditure in just

- two of the three local government areas,
4. River Red Gum logging runs at a loss for FNSW, with the returns from royalties not sufficient to recoup the cost of running the operations.
 5. The industry has very low value outputs, predominantly firewood and fenceposts – only 17% of timber harvested ends up as sawn timber (with less than 5% high value products), and an extraordinary 83% goes to residue markets.

The NRC assessment fails to validate or invalidate this data as there was no proper analysis of the economic value of National Parks and the associated potential tourism income. NVCA appreciate however the recognition of the true number of jobs in the logging industry as only 157 full-time jobs reported after surveying the majority of timber businesses (including jobs on freehold land and in Victoria).

The NVCA requests the following actions to address above-mentioned failings and to improve the assessment process for conservation and industry planning to address the dire environmental situation facing the River Redgums.

ACTION ONE: CREATE LARGE NEW NATIONAL PARKS in accordance with the scientific criteria and in line with current policies and scientific findings on climate change and adaptation. Recognition that Redgum is a vulnerable ecosystem that needs a 60% target for reservation and are vital refuges for plants and animals in a rapidly warming world. Large National Parks are now crucial to ecosystem resilience.

ACTION TWO: A proper scientific assessment of the biodiversity and conservation features to underpin world class reserve design features.

ACTION THREE: Aboriginal ownership of new National Parks wherever sought by Traditional Owners

ACTION FOUR: Much improved environmental water flows to ensure the health of Red Gum into the future.

ACTION FIVE: permanent protection of the RAMSAR sites within the study area.

ACTION SIX: A fair and generous restructure package for the timber industry

ACTION SEVEN: Review current logging prescriptions on forest ecosystems in the study area. In particular we ask for the discontinuation of ecological thinning in Redgum forests and salvage logging.

ACTION EIGHT: *There should be a clear process set down in relation to the EPBC Act 1999, that finally provides surety that unlawful activities will cease and the requirements of the Act will be fully and rigorously applied.*

- The form of the process that is going to be applied under the EPBC Act 1999 should be agreed by both parties – preferably that of a conservation agreement. This will give a formal statutory role for the Federal Government in determining the outcomes of the assessment, provide them an on-going compliance role, and ensure that the outcomes are binding on both parties.
- An end of February deadline should be set for full delivery of the outcomes and finalisation of a conservation agreement under the EPBC Act 1999, so that activities finally comply with that Act.
- Patch-clearfelling should be banned in the interim while the regional assessment is underway and until a final decision is made.

Thank you for your time

Yours faithfully.

The Nambucca Valley Conservation Association

23rd October 2009