

Forests Assessment  
Natural Resources Commission  
GPO Box 4206, Sydney NSW 2001  
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This submission is prepared by the Coffs Harbour –Bellingen Branch of the National Parks Association.

Being residents of the North Coast of New South Wales members of the branch are very aware of the history of plunder of the native forests of the North Coast. The loss of magnificent Red cedar, white beach and lowland rainforest and floodplain occurred largely in the first century of settlement . More recently many older members have witnessed the loss of magnificent hoop pine, tallwood, turpentine and brushbox forests as well as almost complete destruction of remaining rainforests , old growth forests and wilderness.

Branch members have observed over many years the actions of Forests NSW and its predecessors completely and obsessively devoted to extracting every last piece of timber. They have acted against community opinion, overwhelming scientific evidence and despite repeated convictions in the NSW Land and Environment Court to continue for as long as possible these unsustainable practices.

The most recent evidence of the unsustainable nature of local forest practices is the recent report of the NSW Auditor General. The current unsustainable logging regimes on north coast forests resulted from a flawed NSW Government decision to increase the native forest reserve system and continue unsustainable logging levels through a twenty year commitment to industry. The results are that our remaining commercial forests will be effectively clear felled during the twenty year period robbing our future generations of timber supply, causing widespread environmental destruction and production of large amounts of carbon dioxide.

The NRC has the opportunity to learn from past regional forest assessment outcomes that have not been sustainable and has clear responsibility to ensure a similar outcome does not arise in the River Red Gum forests.

The Regional Assessment of River Red Gums and Woodland Forests conducted by the Natural resources Commission (NRC) is inadequate for the following reasons.

**Lack of adequate study and assessment**

The NRC has not conducted a scientific assessment of the conservation values of River Red Gum forests in the study area. The study therefore provides no basis for endorsing an ongoing timber extraction industry when the environmental impacts of past practices are so clearly evident.

The assessment is markedly inadequate as far as forest ecology and systematic conservation planning is concerned. This is at least in part because of the ongoing obstruction of the NSW Government and resistance to a thorough and systematic study

as has occurred in all other forest regions throughout Australia and in fact in most developed countries of the World.

In our view the report does not constitute a Forest Assessment. It does not provide any scientific assessment of the impacts of logging and other activities on forest ecology and does not refer to relevant scientific literature. The involvement of forest ecologists in the project seems to have been minimal.

The report does not identify key ecological features which are the basis for regional conservation planning including refugia, corridors and linking habitats in the region. Nor does the report provide an assessment of the adequacy of environmental prescriptions on logging and fails to make any comparison with prescriptions applied in other regions.

The report does not properly address 99.9% of biodiversity in the forests, restricting itself to a handful of threatened species, without adequately considering biodiversity surrogates or regionally significant species.

The report makes no attempt to quantify the economic benefits from National Parks. It is evident that on the North Coast expanded national parks as a result of the regional forest assessment provide a significant platform for increased economic activity through expanded tourism as well as enhanced ecosystem services such as improved water quality for human consumption and habitat protection, carbon sequestration, and habitat for beneficial species for adjacent agricultural activities

### **The impact of logging**

The impact of logging on ecosystems has not been considered. With regard to forestry matters we believe the report is unbalanced with an apparent pro-logging slant. The obvious impacts of forest operations on regional biodiversity are generally overlooked. 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.

### **Lack of reserve planning considerations**

The report provides no adequate consideration of the national reserve criteria or how they will be met or provide a basis for any form of systematic conservation planning.

Through application of established Australian forest conservation criteria (JANIS) Red Gum is clearly a vulnerable ecosystem that needs a 60% reservation target but this is not included in the report.

As mentioned above, refugia, corridors and linking habitats in the region have not been identified in the report.

The report does not apply or mention the precautionary principle and doesn't canvas the outstanding and well-recognised conservation benefits of National Parks.

The report has also ignored CSIRO findings that large protected areas are vital to the survival of species in a warming world.

### **EPBC Act, 1999**

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

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.

**Climate Change**

The report 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.

We request that the NRC to address these failings listed above by use of panels of expert scientists and include findings ion the next report .

**Recommendations:**

It is clear hat the NRC must strongly recommend to the NSW government that the ouccome for the River Red Gum forests includes:

1. Extensive new Red Gum National Parks to recognized conservation criteria because:

- \* Red Gum is a vulnerable ecosystem that needs a 60% reservation target
- \* Red Gum forests are vital refuges for plants and animals in a rapidly warming world
- \* National Parks are crucial to ecosystem resilience

2. Aboriginal ownership of new National Parks wherever sought by Traditional Owners

3. Much improved environmental water flows to ensure the health of Red Gum into the future

4. A fair restructure package for individuals and businesses affected by the changes.

Yours sincerely

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