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Forests Assessment
Natural Resources Commission
GPO Box 4206
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By email: forests@nrc.nsw.gov.au

RE: Submission to the Preliminary Assessment Report for the Riverina Bioregion Regional Forest Assessment: River Red Gums and Woodland Forest.

The Nature Conservation Council of NSW (NCC) welcomes the opportunity to provide comments on the Preliminary Assessment Report for the Riverina Bioregion Regional Forest Assessment. The Nature Conservation Council is the peak environment organisation in NSW. We work closely with 120 member groups, local communities, government and business to ensure a positive future for our environment.

BACKGROUND

As the Assessment Report has recognised, River Red Gums are an iconic and functional feature of the Australian landscape. The River Red Gum populations in the Riverina Region of New South Wales are suffering due to human interference with the flow regimes of the Murray, Murrumbidgee and Lachlan rivers, forestry activities, grazing, fire management and recreational activities. These trees are essential to the surrounding environment as they contribute to the RAMSAR listed wetlands and provide refuge for many species of native fauna.

FAILINGS

The aim of the assessment is to advise the Government on constructing a forest agreement that will “determine conservation outcomes and a sustainable future for the forests, the forestry industry and local communities”. The NCC recognises the breadth of considerations that must be taken into account ranging from environmental, to economic and social. However we believe that there are aspects of the report which are not satisfactory which are outlined below. Overall there appears to have been too much emphasis placed on the importance of the forestry industry for the local communities in the region, and the need for a focused approach to conservation for the tree populations has been neglected.

Incomplete assessment of the impacts of logging operations:

In our opinion the report presents a pro-logging bias. For example the report justifies targeted thinning and patch clearfelling, which can involve removing mature trees that compete with seedlings for soil and moisture. The report does not acknowledge that illegal patch clearfelling (which can extend up to one metre in size) has occurred. The report has presented limited mention of the negative impacts of targeted thinning and

patch clearfelling, preferring to acknowledge the positive impact of harvesting on the overall health of river red gum populations.

We agree with the Colong Foundation for the Wilderness (Colong Foundation) in their view that the reported performance of Forests NSW should have been more carefully reviewed. As the Colong Foundation suggests forest growth rate data reveals a significant decline in the growth rate, but logging rates have not changed since the 1980s.

To provide a well rounded assessment, we recommend that a senior forest ecologist should be engaged to conduct a thorough and comprehensive review of the wider impacts of logging and targeted thinning.

Conservation approach:

As there is no systematic or comprehensive biological database for the region, formulating a comprehensive and effective conservation plan is difficult. The area is poorly surveyed and lacks a vegetation map which leads to difficulties in setting goals and targets for conservation and management.

The report does not fully explain the Ramsar Wetland values of the area and the requirements for protecting these values under the EPBC Act and international obligations.

The full extent of the significance of the trees as refuges during periods of drought and the extended effects of climate change have not been completely outlined. The wider effects of the continued demise of the River Red Gum populations on the associated ecosystems are vague, and the report focuses on several threatened species, rather than identifying the range and extent of species that may be impacted. As the River Red Gums are important in maintaining ecosystem processes, wider impacts could be more substantial than realised. Landscape scale resilience must be maximised, in order to provide refugia and boost ecosystem adaptation to climate change.

The assessment advocates the JANIS reservation approach, as it is a more strategic and dynamic form of conservation planning. However the report does not acknowledge that JANIS criteria are widely recognised as not being adequate for highly degraded and fragmented areas of vegetation. The report fails to consider how the JANIS criteria could be strengthened in these particular circumstances, to maximise landscape recovery potential.

The report does not place sufficient emphasis on the importance of secure water allocation for optimal conservation outcomes. Environmental water flows and flooding are necessary to the survival of these populations. As the impacts of climate change and drought become more pronounced and there are more competing demands for a limited amount of water, the tree populations will decline. Appropriate water management is a crucial consideration for the future survival of River Red Gum populations in the region.

RECOMMENDATIONS

As there does not appear to be a current biological database and the region is poorly surveyed, the NCC supports a commitment to the precautionary principle, which is required the CAR reserve system, and which the NSW Biodiversity Strategy defines as *“Lack of full knowledge should not be used as an excuse for postponing action. In applying the precautionary principle, public and private decisions should be guided by careful evaluation to avoid, wherever possible, serious or irreversible damage to biodiversity through an assessment of the risk-weighted consequences of various options”*. We would

therefore agree with the Colong Foundation that logging activities should be immediately moved away from all potential high conservation value areas/candidate reserve areas.

The NCC also recommends the implementation of thorough mapping, assessment and monitoring programs, conducted by experienced biologists and ecologists. The assessment should use proven conservation assessment mechanisms, and should be based on strengthened JANIS criteria.

Environmental water flows for the region are essential to maintenance of healthy and thriving tree populations. Unless the issue of environmental water flows is given top priority it will be difficult for the river red gums in the region to recover and to survive the impacts of drought and climate change.

The NCC supports the region being declared as a National Park as this will lead to a "strong conservation benchmark that explicitly and fully applies all of the relevant environmental policies, targets and criteria in a scientific manner" (as recommended by the National Parks Association). The lack of National Park status has resulted in poor and uncoordinated conservation regimes in the past. National Park status will protect the River Red Gums populations from logging, mining, grazing and other damaging activities and contribute a more secure and permanent management strategy.

The Nature Conservation Council would like to thank you for the opportunity to make a submission to this preliminary report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cate Faehrmann', with a long horizontal line extending to the right.

Cate Faehrmann
Executive Director