



North Coast Environment Council Inc.

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Honorary Secretary  
John Jeayes  
54 Shoreline Drive.  
North Shore, Port Macquarie 2444  
Phone 65 84 7079  
0402 717 484  
email : [john.jeayes@bigpond.com](mailto:john.jeayes@bigpond.com)

Forests Assessment  
Natural Resources Commission  
GPO Box 4206, Sydney NSW 2001  
Fascimile: 02 8227 4399  
Email: [forests@nrc.nsw.gov.au](mailto:forests@nrc.nsw.gov.au)  
By email

Dear Sir/Madam, Re NRC River Red Gum preliminary report

There are some positive outcomes from the preliminary report. The NRC has conducted some very useful work in relation to water and socio-economic issues. We are pleased to see the following conclusions:

- The true number of jobs in the logging industry has finally been revealed as much smaller than previously claimed – only 157 full-time jobs reported after surveying the majority of timber businesses (including jobs on freehold land and in Victoria).
- The scale of the threat posed by river regulation and climate change has been reiterated – in areas such as Koondrook and Werai State Forests where close to 90% of trees are stressed or dying and vast areas of River Red Gum are predicted to die.
- A rigorous attempt has been made to quantify future water availability scenarios and the impacts of those on Red Gum health.
- The water-related decline in the timber industry has been exposed – even if no National Parks were created, the volume of timber available will be dramatically reduced due to water stress.

However we were amazed to learn recently that documents obtained under FOI allegedly revealed that although the Federal Government knew the logging going on under the NSW Government of River Red Gum was illegal it decided to take no action after the NSW Minister Ian Macdonald made protests of job loss which he alleged would occur if that logging was stopped. It seems then that the Federal Government may have colluded with the NSW Government to allow something illegal to continue. Is this the case?

This decision from the Minister for the Environment is very concerning to NCEC and thousands of environmentalists and it appears that that denial of scientific imperatives will continue if the Regional Assessment of River Red Gums and Woodland Forests conducted by the Natural Resources Commission (NRC) is allowed to stand as a pseudo-scientific document.

Is it true that the study which was supposed to qualify as either a strategic assessment or a conservation agreement under the EPBC Act, to finally ensure that the law was applied in full but the Preliminary Report released is so inadequate that it simply does not qualify as either?

As we understand it the NRC has not conducted a scientific assessment of the conservation values of River Red Gum forests in the study area. You have not made consideration of the national reserve criteria or how they will be met. We are told that the impact of logging on ecosystems has not been considered. That CSIRO findings that large protected areas are vital to the survival of species in a warming world have been ignored. That refugia, corridors and linking habitats in the region have not been identified. That the report fails to address the legal requirements of that EPBC Act 1999.

We are gravely concerned about the completely unsubstantiated claims made in the draft report promoting 'thinning' as a way of reducing water stress and thus improving tree health. We note that there is no evidence to support the claims, and that in fact there is substantial evidence against it. For example, the only available piece of evidence, contained in the River Red Gum Environmental Impact Statement released in June, shows that there is no relationship between tree health and basal area.

Therefore, regardless of how heavily stocked stands are, they are all showing signs of severe stress. All observational evidence also tells against it - State Forest areas that have been logged and thinned intensively are in very poor health.

It is abundantly clear that the only solution to tree stress is increased flooding, and that it is utterly perverse to suggest that logging, an activity that results in dramatic tree mortality, can improve tree health.

We are thoroughly opposed to any form of so-called ecological thinning unless it were first supported by extensive, rigorous scientific trials conducted by an independent body, and it was thoroughly severed from any commercial considerations.

We ask you to also take proper consideration of the international obligations on the NSW Government in relation to the health of the Central Murray Ramsar site, which includes the Millewa, Koondrook-Perricoota and Werai blocks of forest. Those obligations require the NSW Government to prevent any deterioration in the ecological condition of the site. These responsibilities have not been met under the current management regime by Forests NSW. We believe the only way for them to be met is to reserve the site in its entirety in new National Parks.

We have read information sent to us from the office of the NSW Greens MLC, Mr Ian Cohen. By now you will be aware we are sure of the huge biodiversity impact on River Red Gum ecosystems by logging, climate change and the lack of anywhere near adequate environmental flows.

The information of which we were completely unaware however is that provided on job restructure in Victoria which presents an opportunity to address Minister Ian Macdonald's expressed concerns about job loss if National Parks are created in the Red Gum forests.

Cohen points out that the Victorian Government has recently completed an assessment of River Red Gum forests, resulting in the creation of 91,000 hectares of new reserves, a restructure package for the timber industry and a job positive outcome for the region.

The best estimate of the number of jobs based on public lands in the Red Gum timber industry is 136. It amounts to less than 0.2% of regional employment. An independent report shows that the public land based River Red Gum timber industry is worth only \$7.3 million per annum to the NSW economy. The same report shows that creation of large new National Parks would generate \$100 million per annum in economic activity.

The report also shows that River Red Gum logging on State Forests runs at a loss in NSW, with the

returns from royalties not sufficient to recoup the cost of running the operations. The Red Gum timber industry is dominated by the production of 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 (ie 'waste') markets.

The creation of National Parks has been shown to lead to job positive outcomes for regional communities. The Victorian decision has created more jobs than were lost, and it was supported by a generous restructure for any workers who were affected.

You have the chance now to support a fair restructure package for individuals and businesses affected by the changes.

NCEC would then ask that you address the failing to satisfy the requirements of the EPBC Act in your final draft, recommend extensive new Red Gum National Parks because of the need for a 60% reservation target of this vulnerable ecosystem which has been already 75% destroyed and which could provide refugia for plants and animals in a rapidly warming world and would be crucial to ecosystem resilience.

We ask that you consider sympathetically calls for Aboriginal ownership of new National Parks wherever sought by Traditional Owners.

We request also that you recommend much improved environmental water flows to ensure the health of Red Gum into the future.

As a matter of urgency we urge you to take immediate steps to halt any panic logging activity currently being undertaken which is illegal under the EPBC Act.

Yours sincerely,

John Jeayes (Hon.Sec. NCEC)  
22.10.09