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Forest Assessment
Natural Resource Commission
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Submission on NRC Preliminary Assessment Report on River Red Gums and Woodland Forests

The North East Forest Alliance (NEFA) is a loose alliance of numerous groups and individuals in northern NSW committed to seeing a Comprehensive, Adequate and Representative reserve system on public lands, the protection of all oldgrowth forests and genuinely ecologically sustainable forest management in productive forests. We played a significant role in the forest assessment process in NSW. Legal actions initiated by us in 1990 and 1991 forced the NSW Government to undertake environmental impact assessments for forestry activities. The Forestry Commission of NSW as it was then known began to produce EISs. NEFA again challenged some of these in court. In the meantime the National Forest Policy Statement (NFPS) was signed and State and Commonwealth Governments undertook to engage in comprehensive regional assessments with an aim of creating a system of forest reserves that would be comprehensive, adequate and representative and meet a set of national reserve criteria.

NEFA has seen the Forestry Commission morph into State Forests of NSW and now Forests NSW. What is consistent is that they are a bureaucracy that continues to be secretive and unaccountable. Much of their so-called 'science' is un-published or has been self-published and thus not subject to peer review. Their so-called experts have been shown time and again in numerous fora, from courtrooms to scientific expert panels, to be lacking in credibility. They are masters of spin that have never protected any merchantable tree from logging unless they have been forced to do so.

So it is unfortunate, and indeed unusual that the NRC has accepted the Forests NSW spin and reproduced much of it in this report. Most scientists of repute are highly critical of Forests NSW management, silviculture and environmental assessment and yet significant chunks of the preliminary report particularly Chapter 3 reads like a Forests NSW PR document with the usual errors to which, those of us watching for 20 years now, are accustomed .

As an example: I read with incredulity on p54 that of the 410,000 ha of river red gum forest the net harvest area is approximately 111,000 ha ("Forests NSW pers. comm."). And like all readers I thought, well what is the problem, if nearly 75% of the forest is reserved? The fact that it is quoted as Forests NSW pers. comm. ie anonymous, is the signal to be wary. Sure enough on p58/9 when the FMZ figures are tabulated it is clear that it is the reverse, almost 75% of the forests are the net harvest area.

An error like this is symptomatic of report writers taking the forestry perspective without question. It casts a pall of incredibility over the NRC report, as it regurgitates Forests NSW claims about environmental assessment, sensitive timber harvesting, and post-logging monitoring. All without objective basis. All fantasy.

The NRC would do well to read the NSW Auditor-General's most recent report into Forests NSW where the failure of FNSW to provide the annual reports to parliament, to reconcile its pre-logging estimates with actual harvested volumes and its FRAMES software etc are well documented.

The NRC tells us that Forests NSW protects the large mature hollow-bearing trees. Yes, if a tree is over 2m in diameter it will be protected. This is hardly worthy of praise. The question should be why aren't redgums of over 80cm diameter being protected, given the admitted decline in growth rates, given that they are probably now irreplaceable? Trees of 2m diameter are too big for the equipment being used, that's why they are protected, and because they are now so rare. Really, the wholesale acceptance of the Forests NSW position by the NRC is embarrassing.

The forests of the Riverina bioregion are the most significant example of failure of the NFPS, in that despite their well documented decline, Government inaction continues to allow their ongoing degradation.

The time for making the life or death decision for these forests and the ecosystems they support is now. Failure to seize the moment could well lead to decline beyond repair.

As such the report and process of the Natural Resources Commission can only be described as a inadequate and likely to lead to major ecosystem collapse.

The NRC failed to provide a level playing field, something that had been a key to previous NSW forest assessment processes, where the key stakeholders were provided with the tools and the data to enable our own assessment and critique of such. In this instance the NRC has refused to provide conservation stakeholders with the data on forest inventory, growth rates etc. Conservation stakeholders have been forced to resort to FOI for our data, so it has only been partial, to some extent outdated and missing key information. Where previously we have contributed what has generally been accepted by government as some of the most comprehensive and feasible proposals to enable good outcomes for conservation while providing for genuinely sustainable industry, the NRC has denied us this possibility.

As conservationists who were involved in the discussions leading to the Native Vegetation Act and the formation of the NRC and who have championed a voice for science in Government, the NRC process and outcome is a bitter disappointment, as it appears that a thoroughly discredited agency, Forests NSW has called the shots and the NRC has fallen into line.

The NRC report fails to provide any scientific assessment on the impacts of logging and associated activities on forest ecology. Again we have the regurgitated Forests NSW spin about silviculture aiming to reduce water use etc. Silviculture in the Riverina like elsewhere in NSW is aimed to meet timber contracts in the present in the knowledge that in the longer term ie 20 years, there will need to be dramatic reductions in timber volumes because the wood won't be there (again see the NSW Auditor-General's report). Instead we are treated to phrases such as forest management... "now incorporates a focus on protection of environmental values in partnership with sustainable commercial use of timber resources". (p16) Spin over substance. Like the claim, written as fact that "Achievement of prescribed silvicultural and environmental outcomes is assessed after harvesting..." no reference given, no historical evidence supporting the claim. Where are the reports that show that

the threatened species present in an area before logging are still present, without significant decline in population, a year or a decade after logging. We have asked for such reports from north-east NSW and none exist. There is no reference to such a report in the NRC document, as such claims like this are presumably Forests NSW PR incorporated.

One of the most damaging logging techniques being used in the redgums that even some loggers have complained about is Australian Group Selection. Forests NSW have been gap clear-felling and have only moderated this practice as a result of legal action initiated by the National Parks Association. There is no sound ecological reason for AGS in river redgum forests, nor is there evidence of the silvicultural response claimed.

The NRC report suggests that Forests NSW should be trusted to continue some kind of ‘eco-logging’ or thinning, where they log to maximise water use and increase wood volume. Research is apparently being done on this. But no reports are available or have been peer reviewed to substantiate this claim. On the contrary 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. Conservationists are strongly opposed to Forests NSW being given a mandate for ‘ecological logging’ to meet commercial contracts. They are inevitably in conflict.

Similarly GHD (a consultant for Forests NSW) is quoted as saying that harvesting occurs within “externally verified sustainable forest management framework...” what rubbish! Verified by who or what? Yes Forests NSW meet the Australian Forestry Standard (or the Wilson Tuckey standard as it is known in conservation circles). So do Forestry Tasmania, so do all the state forestry agencies by definition, as the AFS is purely a rubber stamp that recognises that Regional Forest Agreements exist for the area of forestry operations. The fact that these agreements in some places allow the clear-felling of oldgrowth forests is no impediment to certification under the AFS.

Logging in the RRG can never be sustainable as there is now no certainty of future flood events. As a participant in the Natural Resource Advisory Council’s discussions on the Code of Practice for Private Native Forestry, I also know that the logging industry claimed that no significant post-logging regeneration could be expected until after the second flood event. (Wendy Craik when discussing flood events as the chair of the MDBC acknowledged that these could now be decades apart, if they do indeed ever occur again given climate change scenarios for the MDB). Thus the PNF Code of Practice for the River Redgum forests states that regeneration won’t be expected until after the second flood event... 2030? 2050? Long after present management (and the NRC) are forgotten.

The NRC claims to have assessed the forest and its values. But of course it has done nothing of the kind. It has taken data from other sources. It is well known in conservation circles and has been for some years, that Forests NSW have refused access to the Government environment agency to conduct surveys for fauna and flora in these forests. When an agency a) has a vested interest in the results and b) tries to exclude others from gathering information that may or may not corroborate their own surely any critical thinking person might smell a rat?

So, unlike the forest assessments for the east coast and the Brigalow Belt, there is no data on flora and fauna other than for a handful of threatened species. No consideration has been given to biodiversity surrogates or regionally significant species.

The NRC has not considered fauna or flora at all and has merely tabulated the known threatened species and their habitat requirements. In previous forest assessments data on hundreds of species was compiled, their habitat modelled and mapped and the impacts of logging on that habitat considered. Here, we have a sample Forests NSW logging prescription for a species that suggests significant areas are set aside. How many Harvest Plans did the NRC actually assess to determine the frequency of threatened species prescriptions being implemented? How well do these prescriptions protect the relevant species over time? How many post-logging sites did the NRC visit to see what these prescriptions look like in the field?

With Forest Agreements in force for over a decade now there has been plenty of time for Government agencies: Forests NSW and DECCW to monitor these prescriptions and to prepare reports on their effectiveness. We see no reference to such a report in the NRC document, because of course the government agencies have failed to carry out such monitoring. So any claims that such prescriptions might work are based on nothing. The NRC should surely be questioning their effectiveness rather than parroting their existence.

There is no systematic conservation planning, and the NRC report has failed to look at the national reserve criteria (JANIS) and determine how they should be applied in the redgum forests. JANIS determined that 15% of each pre-European forest type should be protected in secure reserves, and 60% where that forest ecosystem was threatened or vulnerable or had been heavily cleared. For some ecosystems the JANIS target was 100%. The RRG qualifies for the 60% threshold and some of the more heavily cleared forest ecosystems for 100% protection. Any proposal from the NRC that fails to advocate the secure reservation of at least 60% of the RRG on public lands will have failed to meet the national reserve criteria. Which in 2009, with the exigencies of climate change, could probably be called conservative.

The NRC Report says that the RRG needs “a more strategic and dynamic conservation planning” (p68). But no examples of what this might look like in the RRG are given.

The Interim report does not identify refugia, corridors or linking habitats while quoting from the CSIRO (2008) report on climate change that such refugia, corridor and linking habitats are important. While a significant part of the report is devoted to the possible effects of climate change there are no practical proposals that will provide our fauna and flora with at least a small chance of adaptation. The key finding of the CSIRO report and indeed several of the references such as Soule, Simberloff etc, are that large protected areas are vital to the survival of species in a warming world. And yet the NRC appears to undermine this view by suggesting that new work on “socio-ecological resilience” suggests a different approach.

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.

On the positive side the NRC has refuted Minister Macdonald’s claims that 1000 jobs would be lost if the RRG industry were to close, by revealing the actual figure to be around 157 full-time jobs including some in Victoria.

The NRC report has also recognised that climate change is a real and immediate threat and that the effect on some State Forests such as Koondrook and Werai State Forests may well see 90% of trees stressed or dying and vast areas of River Red Gum are predicted to die.

Similarly the decline of the timber industry has been exposed. It is in decline, as a result of mechanisation it has been in decline for some time, and in the RRG, it has an additional water-related decline that will see the volume of timber available to the logging industry dramatically reduced due to water stress.

For all of the above considerations the NRC needs to reconsider its approach. Stop accepting Forests NSW view as fact, determine proper environmental assessment methodologies and make Forests NSW data available to stakeholders.

If the NRC fails to do what VEAC has managed, and recommends anything less than a comprehensive, adequate and representative reserve system of secure protection (National Parks) for River Redgum forests, with refugia, corridors and linkages it will deal not only a death blow to those forests, (which will be something to live with!) but it will also seal it's own fate.

It is worth remembering that every forest reserve decision made since the rainforests of northern NSW were protected by Neville Wran, has met with opposition from the logging and grazing industry. Spurious claims about fire hazard have been used to play on the public's fear of wildfire and inflated estimates of social and economic cost have screamed out from the tabloid press and the shock-jocks.

A decade after some of the big reserve decisions in Northern NSW were made, many towns that were meant to 'die' (Wingham, Wauchope, Grafton, Murwillumbah, etc) are thriving. Tourism to National Parks brings significant income to many communities and will do so year after year. Timber volumes decline as inflated timber contracts rob the forests of the largest trees and ongoing mechanisation sees employment decline. The future for Riverina communities is in healing their natural environment, not in continuing to strip it of it's integrity.

A final word on the involvement of the traditional owners, this is vital. Where aboriginal joint ownership or co-management of protected areas is put in place it has led to numerous benefits to local aboriginal communities. Not just in employment but in cultural and spiritual strength. We are all fortunate that the MLDRIN are supportive and indeed actively seeking a greater role in looking after the health of these forests and an end to the land degradation being carried out by the logging and grazing industries.

I'm sorry our response has been mainly negative but your report was truly shocking, it was like a return to the dark ages.

Yours sincerely,

Susie Russell
Co-ordinator