

More detailed submission points in relation to the Preliminary River Red Gum report released by the Natural Resources Commission on the 30th September 2008

Major Concerns with the report:

- It does not apply or mention the precautionary principle and doesn't canvas the outstanding and well-recognised conservation benefits of National Parks.
- The assessment is markedly inadequate as far as forest ecology and systematic conservation planning is concerned. In our view, it does not constitute a Forest Assessment.
- With regard to forestry matters it is an unbalanced report with an apparent pro-logging slant.
- 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.
- It does not review the national reserve criteria and how they will be met or provide a basis for any form of systematic conservation planning.
- It does not properly address 99.9% of biodiversity in the forests, restricting itself to a handful of threatened species, without considering biodiversity surrogates or regionally significant species.
- It 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.
- It does not identify refugia, corridors and linking habitats in the region.
- 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.
- It does not provide an assessment of the adequacy of environmental prescriptions on logging and fails to make any comparison with prescriptions applied in other regions.
- It makes no attempt to quantify the economic benefits from National Parks.

Positive Findings of the report:

- 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, 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.