



PIKAPENE AND CHERRY TREE ENVIRONMENT CENTRE Inc
ABN Number 33 787 522 576

SECRETARY

C. Dillon, (02) 66613585 calekate@hotmail.com
1786 Plains Station Road,
Mookima Wybra, 2469.

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To the NSW Natural Resources Commission,

Thank you for the opportunity to comment on the NSW Natural Resources Commissions progress with the long overdue River Red Gum assessment.

Pikapene and Cherry Tree Environment Centre Inc. have been operating for more than ten years. We are located in North Eastern NSW and have a particular concern with the need for appropriate management of forests across NSW.

Although our focus has primarily been on protection of forests of the NSW North Coast, we find it difficult to reconcile why the forests and woodlands of the River Red Gums have not been adequately assessed for their significant ecological values, until the present time. We strongly feel the need to join our conservation colleagues across the state in demanding better recognition and protection of the ecological value of these forests. The imperatives to protect these areas from unsustainable exploitation are becoming increasingly important particularly as the impacts of climate change appear to be most acute in the south west of the state.

We believe that the NRC has conducted some very useful work in relation to water and socio-economic issues as part of the River Red Gum assessment so far.

We are pleased to see the following conclusions made from the assessment:

- The true number of jobs in the logging industry has finally been revealed as much smaller than previously claimed with 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 need to be dramatically reduced due to water stress.

However, we are alarmed 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 scientific evidence to support these claims and that in fact there is substantial evidence against it. We understand 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.

Other failings of the assessment process which need to be rectified include;

- The NRC has not conducted a valid scientific assessment of the conservation values of River Red Gum forests in the study area.
- There is no consideration of the national reserve criteria or how they will be met.
- The impact of logging on ecosystems has not been considered.
- CSIRO findings that large protected areas are vital to the survival of species in a warming world have been ignored.
- Refugia, corridors and linking habitats in the region which are fundamental to the long term survival of much of the region's biodiversity have not been identified and protected.
- The report fails to address the all legal requirements and responsibilities of the Federal EPBC Act 1999

To address these fundamental failings it is imperative that extensive new Red Gum National Parks are established because;

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

We believe

- Much improved environmental water flows need to be provided to ensure the health of Red Gums into the future
- Aboriginal joint co operative management of new National Parks should be accommodated wherever this sought by Traditional Owners
- A fair and equitable restructure package needs to be provided for individuals and businesses affected by the necessary changes in river red gum management.

We ask that particular consideration is taken by the NRC 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 are not being met under the current management regime by Forests NSW. We believe the only way to ensure appropriate management of these significant areas is to reserve the sites in their entirety in new National Parks.

Thank you for considering this submission.

Yours Sincerely

Carol Dillon (Secretary)

On behalf of Pikapene and Cherry Tree Environment Centre Inc.