

Forests Assessment  
Natural Resources Commission  
Email: forests@nrc.nsw.gov.au

RE: River Red Gum Forest Assessment

Dear NRC,

I am very glad that the NRC has been given the task of assessing the River Red Gum forests.

It is crucially important that the Natural Resources Commission rapidly assess the extreme threats facing the River Red Gum wetlands and recommend strong conservation action to avert those threats. 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 River Red Gum State Forests of south-western NSW are unique wetland-forests that are the largest remnants of vegetation left in one of the most heavily cleared and intensively cultivated landscapes in Australia. These forests function as filters and buffers ('green lungs') that are crucial to the healthy functioning of the Murray River and its tributaries, which include 84,000 hectares of wetlands of international significance under the Ramsar convention.

These forests of south-western NSW contain the two largest stands of River Red Gum left in the world – Barmah-Millewa and Koondrook-Perricoota-Gunbower, which extend either side of the Murray River and have been recognised as Significant Ecological Assets under the Living Murray process. They contain likely habitat for at least 46 threatened animal species and 23 threatened plant species, including the iconic Barking Owl, Squirrel Glider, Southern Bell Frog, Superb Parrot. Furthermore, they represent a major nesting site for migratory birds and regularly support more than 20,000 waterbirds, including 19 migratory birds listed for protection under international agreements.

The River Red Gum State Forests represent the best remaining vegetation corridors between the Australian Alps and South Australia, providing important opportunities for animals to move in response to human-induced climate change and other threats. They also play a major role in native fish migration, spawning and recruitment during flood events and provide habitat for 4 globally threatened fish species.

The Riverina region is one of the most heavily cultivated and poorly reserved bioregions in Australia, with only 1.9% of the region included in reserves. The River Red Gum wetlands are an ecosystem now threatened with total and irreversible collapse as a result of changes in river flows. This has caused the widespread death and decline of 75% of trees along the Murray and associated rivers.

The logging and intensive grazing of River Red Gum in NSW has a massive environmental impact in this context of an ecosystem in crisis. The logging in the Red Gum uses industrial patch-clearfelling which has a major and significant environmental impact. These logging practices are demonstrably unsustainable, with most areas still operating on yield assessments that are 25 years old and which have never taken into account the massive declines in growth resulting from reduced water availability and a drying climate.

The best estimate of the number of jobs based on public lands in the Red Gum timber industry is 136, which 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. This 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.

I would like to recommend that:

- The NSW Government supports the creation of large new National Parks, in accordance with agreed scientific criteria, which are so urgently required in such a poorly reserved bioregion.
- A generous restructure package for the timber industry is provided from the outset of the assessment.
- The regional assessment is completed rapidly and new National Parks are created by the end of 2009 – which is vital given the severity of the environmental crisis.
- There is proper consultation undertaken with Traditional Owners and that jointly-managed Aboriginal-owned National Parks are created wherever that is sought by them.
- A process is established after the creation of the National Parks to provide the required environmental water to dramatically improve the health of the forests.

In relation to the terms of reference for the assessment of the Riverina Red Gum Forests of NSW, I would like to make the following comments:

- The environmental crisis facing River Red Gum is severe - it is already well past the eleventh hour. I believe that a decision needs to be implemented and new National Parks created before the end of the year.
- I believe it is crucial that the precautionary principle is applied in full – given the paucity of detailed environmental survey in the region. It is important that proper precaution is applied on the side of environmental protection.
- I support the inclusion in the terms of reference of water management and the impacts of climate change on future water availability.
- I believe that the identification of large new National Parks should be specified in the terms of reference as a key outcome from the assessment.
- I support the inclusion of EPBC matters in the assessment but believe that interim protections should be imposed to protect Ramsar wetlands from illegal patch-clearfelling while the assessment takes place.
- I believe it should be clear how the requirements of the EPBC Act will be met, and specifically what process under that Act will be applied and how the approval process will proceed.
- The Terms of Reference need to provide stronger and more specific involvement of indigenous people and consultation with indigenous communities. The TOR should require close investigation of Aboriginal Ownership of conservation reserves wherever sought by Traditional Owners.

Thank you for your time and I hope that the NRC recommend strong conservation action to avert the extreme threats currently facing the River Red Gum wetlands.

Yours truly,  
Lucy Palmer