

hunter community
environment centre



PO Box 290
Newcastle 2300

28th September 2009

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

Dear Forest Assessment team,

Thank you for the opportunity to make a submission to the terms of reference for the River Red Gum Forest Assessment. HCEC is glad to see that an assessment is finally underway into these extremely vulnerable forests and that the assessment will be swift.

We would like to make the following comments on the terms of reference:

- The environmental crisis facing River Red Gum is severe - it is already well past the eleventh hour and numerous studies indicate that forest health is poor and that the impact on the forests of both the logging regime and the altered water availability has been profound. Given the seriousness of the situation, we believe that a decision needs to be implemented and new National Parks created before the end of the year.
- We are concerned that the expertise required to conduct the assessment in the interests of ecology and conservation may not yet be available to the NRC. It is important that well-recognised experts in conservation planning and forest ecology are engaged directly to provide advice to the NRC on this issue. Given that the main goal of the process is ecological assessment, the community will not have confidence in the outcomes unless such experts are engaged to provide advice to the Commission.
- We believe it is crucial that the precautionary principle is applied to the River Red Gum forests in full, given the paucity of detailed environmental survey in the region. There is little data available on the use of the forests by threatened and vulnerable species, and next to no survey work was undertaken by Forests NSW for the preparation of their appalling Environmental Impact Statement. Given these circumstances, it is vital that a precautionary approach be applied on the side of environmental protection.

- All relevant conservation criteria should be fully and objectively applied, including criteria for the development of a CAR reserve system and criteria relating to biodiversity and climate change. In particular, the extraordinary conservation significance of River Red Gum forests as the only remaining large refuges for species from drought and a warming climate needs to be recognised.
- We support the inclusion in the terms of reference of water management and the impacts of climate change on future water availability.
- We believe that it is crucial that the identification of large new National Parks should be specified in the terms of reference as a key outcome from the assessment. Secure reserve tenures that protect from all damaging uses, such as logging, mining grazing and inappropriate recreation are required.
- We 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.
- We 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 again for undertaking this assessment and providing an opportunity to make submissions to the terms of reference.

We look forward to the release of the assessment report on the 30th September.

Sincerely

Georgina Woods
Secretary
Hunter Community Environment Centre.