

Natural Resources Commission
By email to: forests@nrc.nsw.gov.au

We welcome the fact that a rapid assessment of River Red Gum forests is being conducted, and that it is to be undertaken by 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. I can see no evidence from the existing information that any such expertise is currently involved. Given that the main goal of the process is ecological assessment, I cannot see how the community can have any 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 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.

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 recognized.

We consider the Terms of Reference should be explicit that the assessment is to identify large areas to be protected as National Park. Secure reserve tenures that protect from all damaging uses, such as logging, mining grazing and inappropriate recreation are required. The Terms of Reference need to specify that a key outcome of the assessment will be an extensive expansion of the formal reserve system.

We support the inclusion of EPBC matters in the assessment, and we support the inclusion in the terms of reference of water management and the impacts of climate change on future water availability.

The Terms should specify 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.

Action to protect these forests is apallingly overdue. The effects of prolonged drought has greatly accelerated degradation from gross over-exploitation. Interim protection should be imposed to protect Ramsar wetlands from illegal patch-clearfelling while the assessment takes place.

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.

The national and regional significance of these unique floodplain forests must be

acknowledged in appropriate terms, informing and guiding assessment and subsequent decisions. For example, assessment and decisions focusing narrowly on vegetation community status, or numbers of threatened plants and animals, or the like, would be a travesty. That is to say, these forests are of intrinsic value, they have been and are being mercilessly trashed, and the importance of reservation, that they may in time recover their integrity, cannot be overstated. The assessment needs to be based on an acknowledgement of this abuse and the current crisis of stressed forests and widespread crown dieback, applying the precautionary principle to the fullest extent, as is appropriate, to achieve extensive new regional National Parks by the end of the year. Anything less will be, not only too late, but too little.

Yours sincerely,

Barrie Griffiths
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