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NEFA

North East Forest Alliance

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

Dear NRC,

RE: River Red Gum Forest Assessment

The North East Forest Alliance is a voluntary conservation alliance of groups and individuals that for 20 years has actively sought a comprehensive, adequate and representative reserve system for the forests of NSW.

Initially we focused on the forests of northern NSW, but since 2003 many of us have been involved in the need for a CAR reserve system in other parts of the state and support the work of the National Parks Association in vigorously promoting the need for action in forests that are in severe decline due to environmental stress which is being exacerbated by management practices such as logging and grazing.

We are very glad that the NRC has been given the task of assessing the River Red Gum forests. This needs to be done quickly. Already the delaying tactics of Forests NSW have seen many forest areas seriously degraded by intensive logging with no regeneration events due to the lack of water.

With respect to the terms of reference for the assessment we make the following comments:

- The environmental crisis facing River Red Gum is severe - it is already well past the eleventh hour. A decision needs to be implemented and new National Parks created before the end of the year.
- 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. Having first hand experience of the coastal assessment process I cannot stress enough the need for expertise independent of forestry interests. For the community to have confidence in the outcomes ecologists need to be 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 support the inclusion in the terms of reference of water management and the impacts of climate change on future water availability.
- We believe 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.

I have been involved in the development of the Code of Practice for Private Native Forestry. Industry and forestry demanded in that Code that no regeneration be expected after logging until two regeneration events had occurred in the logged area. A regeneration event was defined as flooding. Wendy Craik of the MDBC has said that in many areas it has been 15 years or more since there has been a flood.

Clearly a logging industry that cannot predict regeneration and that continues to log regardless of climate variability is unsustainable.

This assessment is the last chance for these forests. Once it is complete the Government will make its decision and there will be no second bite of the cherry. Especially if the Government does as it has elsewhere in the state and gives long-term wood contracts to industry.

As such, this is an historic opportunity for the NRC, you actually get to make recommendations that will determine the future of these forests, and the species that depend on them. The credibility of the NRC as a science-based organisation is on the line.

Only by ensuring that the conservation voice is heard and that Forests NSW are not allowed to delay, obfuscate and attempt to bamboozle with their wood fiction (FRAMES), can the NRC reach a decision that addresses the climate of the 21st century and will allow these forest to recuperate and have a fighting chance in the times ahead.

Yours sincerely,

Susie Russell, Coordinator