



**The Wilderness Society Sydney**  
**Submission to the Natural Resources Commission**  
**River Red Gum Investigation**  
**September 2009**

This submission was prepared by Peter Cooper, NSW Campaigner for The Wilderness Society Sydney.

The Wilderness Society is a national, community-based, environmental advocacy organisation whose purpose is protecting, promoting and restoring wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth.

The Wilderness Society would like to thank the NSW Government and the Natural Resources Commission for the opportunity to make this submission.

## **Executive Summary**

The River Red Gums Forests of south western NSW occur in one of the most heavily cleared and poorly reserved regions in the whole of Australia. Their conservation values are significant and well recognised by their Indigenous traditional owners and the wider community.

The region is one of the most threatened landscapes in Australia. The Australian Terrestrial Biodiversity Assessment carried out by the National Land and Water Resource Audit (NLWRA) in 2002 found the Riverina bioregion to have:

- The highest measures of landscape stress in the country (including parameters such as habitat fragmentation, altered hydrology, dryland salinity, over-grazing and other land use pressures).
- The poorest levels of river catchment condition in the country.
- The highest numbers of threatened species.
- The highest proportions of threatened ecosystems.
- The widest ranges of threatening processes (e.g. pests and weeds, clearing, salinity, grazing pressure, changed fire regimes).
- The largest on-going decreases in ground bird species.
- The lowest proportion of ecosystems protected in formal national parks and reserves, and highest levels of risk of irreversible loss of those ecosystems.

This submission recommends that the entire State Forests in the region be placed in new Aboriginal-owned National Parks negotiated with their Indigenous Traditional Owners; and that adequate water be provided to the forests.

The forests are suffering from extreme water stress, due to over regulation of the regions' river systems, drought and climate change. Returning water to the forests must be a key strategy in their conservation.

The creation of new National Parks across the entire State Forests in the region would also recognise the forests values as refugia and as a landscape scale wildlife corridor, thus assisting native wildlife to adapt to climate change

New National Parks represent not only the best outcome for the environment, but also for the regions' economy. Both independent research in NSW and the Victorian experience have shown that new National Parks will result in a net gain in employment for the region.

However, it will be important that if the timber industry is removed from the regions' State Forests then a fair and equitable restructure package must be offered to effected workers to allow for a smooth transition to new employment.

We believe that these outcomes are supported by an application of the government's JANIS targets and would be in line with the findings of the Victorian Environmental Assessment Council (VEAC), which conducted a 3 year study into Victorian River Red Gum Forests.

### **Summary of recommendations**

- The River Red Gum Forests must be recognised as a threatened vegetation class and as possessing valuable qualities as refugia in a heavily cleared landscape.
- As such, a minimum of 60% of their remaining cover across both public and private land must be protected.
- This protection should be achieved through the declaration of new National Parks across the entire State Forests in the region.
- That government negotiate with the forests' Indigenous traditional owners over the creation of new National Parks and that joint management structures are declared wherever sought.
- That the forests role in both mitigating local climate change and allowing native wildlife to adapt to a changing climate be recognised and protected.
- That logging is removed entirely from the regions' State Forests.

- That a fair and equitable restructure package be provided to workers affected by the declaration of new National Parks.
- That the removal of logging from the State Forests through the creation of National Parks coincides with a reduction in the amount of timber and firewood produced in the region, so as to not lead to an increase in logging across private land.
- That grazing is removed from the entirety of the regions' forests.
- That, as a minimum, sufficient water be allocated to environmental flows to allow for a major flood event within every 5 years.

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## **Ecological Values of the area**

The River Red Gum State Forests of south-western NSW are unique wetland-forests that support critical biodiversity and other natural values and retain natural processes integral to Indigenous cultural values. These forests:

- Are the largest areas of vegetation in one of the most heavily cleared and poorly reserved landscapes in Australia.
- Include 84,000 hectares of wetlands listed as internationally significant under the Ramsar Convention.
- Contain the 2 largest River Red Gum Forests on earth, both of which have been recognised as Significant Ecological Assets under the Living Murray process.
- Represent a vegetation corridor from Kosciusko to the Coorong, which will allow native animals to adapt to climate change.
- 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 and Superb Parrot.
- 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.
- Play a major role in native fish migration, spawning and recruitment during flood events and provide habitat for 4 globally threatened fish species.

## **The Victorian Environmental Assessment Council River Red Gum Investigation**

The Victorian Environmental Assessment Council (VEAC) exists to *“conduct investigations that are requested by the Victorian Government relating to the protection and ecologically sustainable management of the environment and natural resources of public land.”* (VEAC website).

In April 2005, the Victorian Environment Minister commissioned VEAC to:

(a) Identify and evaluate the extent, condition, values, management, resources and uses of riverine red gum forests and associated fauna, wetlands, floodplain ecosystems and vegetation communities; and

(b) Make recommendations relating to the conservation, protection and ecological sustainable use of public land as specified in Section 18 of the *Victorian Environmental Assessment Council Act 2001*.

A discussion paper was released by VEAC for public comment in October 2006, followed by draft proposals in July 2007. A final report was released by VEAC in July 2008, which the Victorian Government responded to following a report prepared by a Community Advisory Panel. A copy of these reports is included as Appendix 1

Key recommendations coming from VEAC as a result of their investigation that relate to this submission were:

- The creation of five new and three expanded National Parks along the Murray, Ovens and Goulburn Rivers, along with a series of other forms of reserve outcomes, which increased the size of the parks and conservation reserve system from 69,640 hectares to 173,240 hectares.
- A major reduction in State Forest available to logging, from 106,910 hectares to 12,290 hectares, with a recommendation that government examine industry restructure packages for affected businesses.
- Enhanced involvement of Indigenous people and Traditional Owners, including co-management of Barmah National Park and Nyah-Vinifera Park through Boards of Management, and Aboriginal Advisory Committees for a number of other park and reserve areas.
- Domestic stock grazing to cease immediately across most public land, with a five year phase-out for water frontage land.
- A recognition that the most urgent and serious environmental problem in the investigation area was the need for delivery of sufficient environmental water to halt the imminent loss or degradation of large areas of flood-dependent riverine forests and wetlands.
- The conclusion that the consolidation of these areas into large and well connected reserves is an important component ensuring long term viability and allowing for species movement across the landscape. Strong habitat linkages also provide a buffer for the future effects of climate change.

VEAC predicted a net economic benefit to Victoria of \$107m/year based on achieving adequate environmental water for flood-dependent ecosystems (excluding the costs of the environmental water). Benefits arise due to increased valuation based on the environmental attributes in new parks,

increased protection of wetlands, cessation of grazing on streambanks and increased tourism and recreation.

The Victorian Government announced the creation of new National Parks in Victoria in December 2008 and then formally responded to VEAC's recommendations in March 2009. The Victorian government has explicitly recognised

*"... the importance of protecting the ancient river red gum forests along the River Murray and its tributaries currently threatened by drought and climate change so that they can be enjoyed by future generations. The red gum forests are highly valued by the community for a range of cultural, recreation and tourism activities as well as for timber".*

The Victorian government has therefore specifically provided, through the creation of new River Red Gum National Parks

*"for the protection of the red gum forests, while enhancing recreation and tourism opportunities in the region and protecting the social and economic health of affected communities."*

Given the similar scope between the VEAC and NRC River Red Gum Terms of References and the significant body of work prepared by VEAC in relation to this, The Wilderness Society urges the NRC to draw heavily upon VEAC's findings and recommendations. This is with particular regard to the provision of adequate water to the forests, the creation of large areas of new co-managed National Parks and the benefits to the community flowing from this.

### **National (CAR) Reserve System**

In a report commissioned by the NSW Government, Nix and Mackey (2003) raise multiple concerns regarding the effectiveness of the JANIS criteria, particularly in contexts beyond the temperate forests for which the criteria were originally created. They make the point that targets (such 60% of current extent) are nominal and have been created via a process of political compromise, rather than on any ecological grounds. They further state that:

*"There has actually been no scientific evaluation in Australia to date of the percentage necessary to maintain ecological processes and life support system".*

Perhaps the most fundamental of Nix and Mackey's criticisms is of the lack of recognition that the Criteria afford to the connection between ecological processes and patterns. In the years since the Comprehensive Adequate and

Representative principles were first created, there has been substantial development in the theory of ecological conservation. This recognises that for long term success of conservation efforts, it is important to maintain fundamental processes rather than simply areal representation in reserves. Formal protected areas are now recognised as only one in a suite of tools required for long term ecological health of a landscape and, while necessary, are rarely sufficient (Carwardine *et al* 2009).

While targets may be a useful tool in achieving conservation goals, the area to be conserved should be determined by the ecological context. In many cases, decisions based on the JANIS criteria could be considered woefully inadequate (Watson *et al* 2008).

**However, whatever assessment approach or criteria are used, The Wilderness Society sees the creation of new large-scale reserves as essential as the forests are a clearly vulnerable ecosystem.**

Within the River Red Gum Forests, recognition of key threats, including, but not restricted to forestry will be important. Water availability, including consideration of quantity and timing is paramount both in survival of mature trees as well as recruitment of juveniles (Wen *et al* 2009). Measures to ensure that water regimes are suitable for the range of organisms present in the River Red Gum Forests must go far beyond the boundaries of any protected areas created.

River Red Gum must be considered as a vulnerable ecosystem because it is subject to continuing and significant threatening processes in the form of reduced water availability. Studies have recognised the extremely high levels of stress and decline of the forests, with up to 75 percent of trees stressed, dead or dying (Brett Lane and Ass Pty Ltd 2004, Cunningham *et al* 2007).

The Australian Terrestrial Biodiversity Assessment carried out by the National Land and Water Resource Audit (NLWRA) in 2002 found the Riverina bioregion to have:

- The highest measures of landscape stress in the country (including parameters such as habitat fragmentation, altered hydrology, dryland salinity, over-grazing and other land use pressures).
- The poorest levels of river catchment condition in the country.
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- The widest ranges of threatening processes (e.g. pests and weeds, clearing, salinity, grazing pressure, changed fire regimes).
- The largest on-going decreases in ground bird species.
- The lowest proportion of ecosystems protected in formal national parks and reserves, and highest levels of risk of irreversible loss of those ecosystems.

The region has been identified as one of the most highly threatened bioregions in the country by the National Land and Water Resources Audit (NHT 2002), with more than 80% of the subregion along the Murray River having been cleared of native vegetation since 1788 (NSW SOE 2006). It also has been recognised as one of the highest priority bioregions for new conservation reserves in Australia by both the National Land and Water Resources Audit and the National Reserve System Directions report (NHT 2002, NRMMC 2005).

**The Wilderness Society sees the most appropriate and means of working towards the reservation of the remaining cover, as required for vulnerable ecosystems, to be converting the entirety of the regions' State Forests to National Park.**

### **Value as refugia for threatened species**

JANIS criteria place a particular reference on "*areas of high species diversity, natural refugia for flora and fauna and centres of endemism*" (JANIS 6.1.2)

Riparian areas have frequently been recognised for their biodiversity value, often disproportionate to the area they occupy in the landscape (e.g. Naiman *et al* 1993; Palmer and Bennett 2006). They have a critical role in the landscape, providing ecological refugia that allow persistence of many organisms in times of drought and longer periods during which conditions are hostile in the broader landscape. The manner in which we address the conservation of these areas should therefore take adequate account of their ecological function and how this can be maintained over a long period and in various conditions, such as the overall drier conditions considered likely in the future.

The region has been subject to very high extinction rates, with at least 16 vertebrate fauna now considered extinct in the region and a further 63 vertebrate fauna species threatened with extinction. The forests contain likely habitat for at least 46 threatened fauna species and 23 threatened flora species, including species such as the iconic Barking Owl, Squirrel Glider, Southern Bell Frog, Superb Parrot and Regent Parrot.

VEAC explicitly recognised that "*[t]he relatively small and fragmented remaining area of these ecosystems is a last refuge for many of the 350 threatened and near threatened plants and animals*" in its final 2008 report.

Due to the high level of threat in the Riverina region, it is vital that all regionally significant species are identified and appropriate targets set for their conservation.

The forests represent a vital drought refuge for animal species as moist riverine forests in a predominantly semi-arid environment and, as such, considerations must therefore be placed on the forests values as refugia.

## **Climate change**

### Adaptation

The NSW and National Biodiversity and Climate Change plans require that there is detailed assessment of natural refuges and habitat linkages, and identification of ecosystems and species that are vulnerable to climate change. Reserve design and size must protect all identified refuge and corridor areas, with buffers, and dramatically improve reserve outcomes for all species vulnerable to climate change.

A National Action Plan has been developed for Australian biodiversity in response to greenhouse climate change (NRMMC 2004). This seeks to develop "*strategies to reduce the physical barriers to movement to facilitate the migration and dispersal of terrestrial species and communities that are vulnerable to climate change*".

Both the Murray River and the River Red Gum Forests have been identified as a key "biolinks" and should be reserved in their entirety to protect the integrity of this landscape scale wildlife corridor.

Recent developments in the theories of ecological conservation recognise that for the long term success of conservation efforts, it is vital that they occur on a landscape level. National Parks across the entirety of the State Forests would recognise this shift in thinking, but should also be followed up through conservation measures off reserve.

### Mitigation

The recent intense debate on climate change in Australia has focused on greenhouse gas pollution coming from fossil fuel energy sources. Largely forgotten in the debate is the major role played by trees and other vegetation in absorbing greenhouse gas pollution and storing it out of the atmosphere.

Also forgotten is the contribution of tree clearing and logging to increases in CO<sub>2</sub> in the atmosphere – clearing and logging in NSW alone releases more greenhouse pollution than adding 4 million cars to our roads.<sup>1</sup>

The IPCC Report, released on 18 November 2007 estimates that 17.3% of international greenhouse gas emissions are caused by forestry, including land clearing and deforestation. This is second only to fossil fuel emissions which account for 56.6% of emissions.

A recent study led by the University of Queensland, "Modelling Impacts of Vegetation Cover Change on Regional Climate", has also shown that landclearing has a 'significant' effect on regional climate, increasing temperature and decreasing rainfall in NSW.

Protecting and restoring NSW's native vegetation needs to be a critical policy and management consideration towards reducing the effects of climate change. This would further bring policy inline with the Natural Resource Commissions own recommendations adopted within the NSW State Plan.

## **Water**

VEAC recognised that *"...if flows are not restored to forest and wetland systems, they will suffer irreparable damage and will be permanently lost for future generations"*.

The Wilderness Society strongly supported VEAC's draft recommendations R10, 11, 12, 13, 14, 15, 16 and 17 (attached in Appendix 2). We also strongly support the provision, as a minimum, of a large flood event within every 5 years as vital to the ongoing health and viability of the floodplain forest ecosystems and the health of the river as a whole. Similar outcomes must be provided in NSW to ensure adequate water for the forests.

VEAC's draft recommendations complimented the 2002 Murray Darling Basin Commission expert panel findings. The science is clear – a large volume of water must be provided to maintain the existing forest/wetland/river system or the decline will continue to catastrophic levels.

In addition, recognising the significant value of the Murray Darling basin to its Traditional Owners, we support the Murray and Lower Darling Indigenous Nations call for 'cultural' water allocations to be made to each Indigenous

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<sup>1</sup> From Spatial Estimates of Biomass in Mature Native Vegetation, Australian Greenhouse Office and NSW Auditor General Report data estimating that 74,000 hectares are cleared in NSW each year, releasing 11.4 million tonnes of greenhouse gas. Estimates suggest that native forest logging is contributing 5.11million tonnes of GHG each year, based on conservative estimates of carbon lost when old growth wet forests are logged. This figure is only from forests logged between 2002-2003, on the South coast of NSW only. No other data are currently available. Each 4 million tonnes of ghg is counted as equivalent to one million hence logging and clearing contribute more GHG pollution than 4 million cars.

nation to enable them to implement culturally-based management of Red Gum wetlands.

### **Overview of the timber industry**

The River Red Gum logging industry is a marginal, low value industry. River Red Gum is used predominantly for low value products such as fence posts, sleepers and firewood, with high value products equating to less than 5% of output (BIS Shrapnel report, 2001).

Independent analysts Economists at Large, commissioned by The Wilderness Society and National Parks Association of NSW, have found that the value of the timber industry has been significantly overstated by the NSW Government and estimate the gross mill gate value of the timber sourced from public land to be \$22 million. The disparity between this and the figure given by Forests NSW is in part due to Forest NSW's use of a multiplier. The Wilderness Society agrees with Economists at Large's assertion that the use of a multiplier is inappropriate for policy decisions, as it implies that this value would be lost if the industry were to be replaced. As the industry is not to be removed, but replaced by a strong tourism economy, a multiplier is not appropriate in this instance.

Economists at Large estimate that the value of the royalties paid to the NSW taxpayer at the forest gate to be \$4.1 million, at a profit of \$0.94 million. However, when full costs not borne by Forests NSW are factored in, Forests NSW in the Riverina would actually operate at a loss of \$1.8 million to the taxpayer.

Economists at Large therefore assert that the industry is heavily subsidized by the NSW taxpayer and that these subsidies are having a negative impact on the production of private plantations and industry based on logging on private land.

The Economists at Large report is in line with recent findings by the NSW Auditor General report which found that, across NSW, native forest logging operated at a loss of \$14 million to the NSW taxpayer for the 2007-2008 financial year. Minister for Primary Industries, Ian Macdonald, has also previously admitted that losses have been incurred. A full copy of the Economists at Large report is attached as Appendix 3.

The Red Gum timber industry in Victoria was estimated by VEAC to contribute less than 0.1% of regional economic activity, with a net economic contribution of \$2.5 million per year. In contrast, the tourism industry in the region attracts 8 million visitor days and results in \$970 million being spent each year in the region (VEAC 2007).

VEAC's recommendations for new reserves have been predicted will lead to a net increase in economic value to Victoria of \$92 million per annum (excl cost of environmental water) (VEAC 2007).

## **Regional Employment**

Detailed figures relating to the level of employment supported by the River Red Gum State Forest timber industry have not been made available to The Wilderness Society. However, Forests NSW estimates 463 people are directly employed across both tenures, with State Forests supplying approximately half of the timber. This equates to less than 0.6 percent of regional employment (Forests NSW Environmental Impact Statement, 2009). Of this, 183 people are directly employed by the regions mills, again across both tenures.

Economists at Large, who have produced the only independent research focusing solely on employment across the regions' State Forests that The Wilderness Society is aware of, have estimated that the River Red Gum State Forest timber industry employs 136 people in NSW. They predict that the creation of National Parks across the regions' State Forests would lead to a net gain in employment. Tourism, which makes use of the forests well recognised environmental conservation values, already employs over 1200 people in just 2 of the 3 local government areas where logging occurs in the region.

Victoria has recently converted approximately 90 percent of their River Red Gum Forests to National Park. This resulted in 34 seeking assistance from government, while creating an estimated 63 new positions (*Victorian Government Media Release, 28 August 2009*), an immediate net gain in employment for the State.

The Victorian figures lay rest to claims made by industry and pro-logging stakeholders claims over the amount of jobs at risk as a result of the Victorian decision, which has ranged from 90 to over 1000. Given the disparities between the figures given in NSW – logging advocates have claimed 800 to 1000, which Economists at Large estimate 136 – We urge the NRC to both bear in mind the Victorian outcomes and undertake independent research in NSW to determine the extent of employment in the industry and the potential for job gains following a National Parks outcome.

While the creation of new National Parks represents the best medium and long term outcomes for the regions' economy, The Wilderness Society acknowledges that, in the short term, there may be some negative effects for workers. We recommend that a fair and equitable restructure package be provided to workers affected by the creation of National Parks, so as to allow for a smooth transition to new employment. Previous estimates provided by

The Wilderness Society and the National Parks Association of NSW have placed the cost of such a restructure at \$14 million.

## **Logging Impacts**

As already discussed, the River Red Gum Forests are experiencing extreme water stress. This is being further compounded by the major environmental impacts associated by logging within the forests. The Wilderness Society believes that, especially given this water stress, management should focus on recovery and conservation, rather than resource extraction.

In its final report, VEAC *"identified that past and current uses and management are seriously affecting the long-term viability of the River Red Gum forests and wetlands"* (VEAC 2008).

The Federal Government has also acknowledged the impact that logging is having: *"...clear felling in patches destroys the continuity of the tree canopy and that is having a very significant impact on the ecological character... ...it is having a significant impact on the habitat of nationally listed threatened species."* (Federal Hansard, 28 May 2009, Budget estimates, Environment, Communications and The Arts References Committee)

A previous scientific report prepared for the NSW Government on the impact of patch-clearfelling in northern NSW found that creation of gaps greater than 40m in diameter lead to the decline of hollow dependent fauna and declines in overall species richness (Attiwill *et al.* 1996). Within the River Red Gum Forests, patch clear fells are created that are up to 80m in diameter.

Fallen timber, removed for firewood, is also recognised as being crucial to biodiversity (Mac Nally *et al.* 2002). The removal of fallen timber for firewood impacts greatly on many species and is one of the major threatening processes for threatened carpet pythons and grey-crowned babbler (Davidson & Robinson 1992; Heard *et al.* 2004).

The Wilderness Society supports the removal of logging from the entirety of the State Forests of the region.

## **Grazing Impacts**

*"Grazing has a major negative impact on wetlands, as a result of cattle destroying delicate wetland plants, and damaging important wetland habitats such as lignum and sedges. Similarly, grazing can degrade river frontages and cause erosion, make river and creek banks unstable and cause subsequent siltation, increased pollution and nutrient loads in the river"* (VEAC 2008).

Grazing also impedes natural regeneration of River Red Gum and numerous other species and can contribute to the spread of environmental weeds, as well as contributing to the decline of woodland birds (Reid 1999, Jansen & Robertson 2001).

VEAC has stated that “scientific evidence indicates that stock grazing in general adversely affects natural values, especially biodiversity, water quality and soil condition” (VEAC, 2008) and outlined a number of threats to biodiversity as a result of grazing.

The Wilderness Society recommends that grazing be completely removed from the forests, in line with recommendations made by VEAC for Victorian River Red Gum Forests.

### **Indigenous participation**

The Wilderness Society sees the best outcomes for the region as including worlds’ best practice Indigenous protected areas, comprising a number of large Aboriginal-owned National Parks wherever this is sought by the forests’ Traditional Owners, which would promote land justice, cultural survival and a firm economic base for Traditional Owners.

Traditional Indigenous Nations are the original owners of all lands and waters along the Murray and have never relinquished their custodial right to protect and preserve their country. The Indigenous Response to the Living Murray Initiative (MDBC 2003) sets down in detail the aspirations of the 10 local indigenous nations for the future of Murray Darling basin (Attached as appendix 4).

The Indigenous people along the Murray want to be recognized for their cultural responsibilities for care of the Basin, and want to be able to manage the area in a sustainable way (MDBC 2003).

The River Red Gum State Forests are the only substantial areas of public land along the Murray and Murrumbidgee River systems and floodplains. There are little or no other public lands available for acquisition by traditional owners.

The creation of new Aboriginal-owned National Parks from Red Gum State Forests would: provide an improved economic and employment base for indigenous communities in the region; help conserve the exceptional cultural; social and environmental values of these forests; and facilitate the on-going transmission of an ancient and living culture by traditional owners.

The Wilderness Society recognises that the Murray Lower Darling River Indigenous Nations (MILDRIN) promote the provision of ‘cultural’ water allocations to each indigenous nation to enable them to implement culturally-based watering and management of Red Gum wetlands. We urge the Natural Resources Commission to also consult Traditional Owners over these provisions.

Due to the short timeframe of the assessment, we recommend that this negotiation with, and involvement of, Traditional Owners over the forests' future continue beyond the scope of the assessment and into the future.

Within a context of cultural conservation, The Wilderness Society believes that a landscape scale approach to the conservation of culture and cultural values is crucial in recognising the relationship between people and places. As such, protection must be afforded not only to significant sites, but to the whole landscape, as each site exists because of its position and role in this larger context.

## **Community Support**

The outcomes proposed by The Wilderness Society enjoy a high level of support across the community. The Wilderness Society has to date delivered over 15,000 messages from community members to the NSW Government, calling for the protection of the entirety of the State Forests of the region. A number of city councils in NSW have also passed motions acknowledging the significance of the forests and calling for the creation of new National Parks.

The NSW Government has also recognised the protection of these forests as *"an important conservation objective for the NSW Government"* and has acknowledged the *"significance of the river red gums and wetland ecosystems as habitat for threatened species and migratory birds, and is committed to their conservation"*.

## **NSW State Plan**

The NSW State Plan contains a target to improve the condition of important wetlands and a commitment to create a Comprehensive, Adequate and Representative reserve system.

Priority E4 of the State Plan commits the NSW Government to delivering "better outcomes for native vegetation, biodiversity, land, rivers, and coastal waterways." Specific targets in the Plan that are relevant to Red Gum forests include:

- By 2015 there is an increase in native vegetation extent and an improvement in native vegetation condition
- By 2015 there is an increase in the number of sustainable populations of a range of native fauna species
- By 2015 there is an increase in the recovery of threatened species, populations and ecological communities
- By 2015 there is an improvement in the condition of riverine ecosystems
- By 2015 there is an improvement in the condition of important wetlands, and the extent of those wetlands is maintained

In order for NSW to meet the State Plan targets, The Wilderness Society believes new National Parks must be created in the severely under-reserved River Red Gum forests.

## **Conclusion**

The conservation values of the forests and the extreme stress they are facing due to a lack of water are widely acknowledged and accepted. Extractive industries within the forests are both destroying these values and worsening the environmental crisis facing the forests. The conversion of the regions' State Forests to new National Parks represents an opportunity to begin to turn this crisis around while at the same time strengthening and diversifying further the region's economy.

Replacing a marginal industry that is a drain on the public purse with sustainable, long term employment makes good sense, especially given our current economic situation.

New National Parks also represent an opportunity to involve Indigenous people in the management of their landscape.

Coupled with the Victorian decision, the creation of National Parks across the entirety of the NSW River Red Gum State Forest estate in consultation with their Traditional Owners represents an historic opportunity to deliver a cross border, scientifically based outcome that brings us closer to realising conservation outcomes in the region on a landscape scale.