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Forests Assessments  
Natural Resources Commission  
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28th August 2009

**RE: River Red Gum Forest Assessment**

Dear NRC,

TEC welcomes the opportunity to make this short submission to the NRC's assessment process. It is a very positive step that the NRC has been given the task of assessing the River Red Gum forests. It is essential that the threats faced by these forests are assessed rapidly and that strong conservation recommendations addressing these threats are made.

We wish to make the following comments addressing the terms of reference:

The environmental crisis facing River Red Gum forests is extremely serious. A decision needs to be implemented and new National Parks created before the end of the year.

Expert advice in conservation planning and forest ecology should be engaged directly to provide advice to the NRC on this issue. There is no evidence from the existing information that any such expertise is currently involved. With the main goal of the process being ecological assessment it is difficult to see how the community can have confidence in the outcomes unless such experts are engaged to provide advice to the Commission.

Given the lack of detailed environmental survey in the region the precautionary principle should be applied in terms of environmental protection and reserve outcomes.

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.

TEC supports the inclusion in the terms of reference of water management and the impacts of climate change on future water availability.

A viable regional reserve system should be specified in the terms of reference as a key outcome of the assessment. This should comprise secure reserve tenures that protect from all damaging uses, such as logging, mining, grazing and inappropriate recreation.

Interim protections should also be imposed to protect Ramsar wetlands from illegal patch-clearfelling while the assessment takes place.

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 should also be indicated.

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.

Kind regards,

David Burgess  
Natural Areas Campaigner