

Natural Resources Commission
GPO Box 4206
Sydney NSW 2001

Friday 25 October 2013

SUBMISSION

Brigalow and Nandewar Cypress Forest Management

Mudgee District Environment Group (MDEG), based in the Mid-Western Region local government area in NSW, is working for the conservation of our natural heritage and a sustainable future for our children.

MDEG appreciates the opportunity to provide comments on the assessment of active and adaptive management of cypress within western woodland ecosystems in the Brigalow and Nandewar State Conservation Areas (Zone 3).

MDEG participated in the Western Regional Assessment process that resulted in the *Brigalow and Nandewar Community Conservation Area Act 2005*.

An article published in the North West Magazine (14 October 2013) outlines issues with timber supply from the region and suggests that the use of ecological management will '*give Gunnedah Timber a much broader access into conservation areas, which currently they can't access.*'

The article identifies that it would take an Act of Parliament to de-gazette the conservation areas and that the proposal to open up State Conservation Areas for commercial thinning activities under the guise of 'ecological thinning' would avoid the legislative process.

MDEG considers that the sudden need to actively and adaptively manage cypress in Brigalow and Nandewar Zone 3 areas is a back door method of opening up the reserves to commercial timber harvesting.

The article states that '*everyone in the timber industry knows that if you don't manage Cypress pine it just locks up and basically chokes out the forest.*'

MDEG maintains that cypress 'lock up' is caused by the disturbance of timber harvesting activities, land clearing and other forms of human intervention. The natural woodland areas, with a mix of species, cause competition for cypress that prevents its domination in the landscape.

Past forestry management practices caused the active removal of eucalypt species to encourage plantation style cypress growth.

The State Conservation Areas are not forests. They are reserves of western woodland vegetation communities that are managed for the conservation of threatened species habitat. These areas in the Brigalow and Nandewar bioregions have been successfully managed by the National Parks and Wildlife Service (NPWS) since gazettal in 2005.

MDEG is very concerned that the sudden perceived need for active and adaptive management of cypress in these areas, 8 years after gazettal, is based on the need to continue wood supply to the Gunnedah timber mill. There is no evidence based information obtained through recent scientific research in Zone 3 areas to indicate a need for rapid change in management regimes.

The areas of disturbed woodland habitat, as a result of past commercial forestry activities, will regain a balance over time. Some active management in the form of mosaic burning may help to speed up the process. However, this needs to be tested through rigorous scientific research.

MDEG objects to a backdoor process attempting to open up conservation areas for commercial timber harvesting activities.

The size of cypress logs needed to fit the specifications that Gunnedah Timbers are after is well outside the size of cypress 'lock up'.

The key pertinent issue at hand is the wood supply agreement signed by the previous NSW Government. The volumes of timber promised to the timber industry were totally unrealistic because the Forest NSW timber supply model was faulty.

It is highly inappropriate for the NSW Government to consider honouring an over optimistic agreement by threatening the values of areas set aside for conservation purposes.

MDEG is of the opinion that commercial thinning programs are not consistent with the objects of either the *National Parks and Wildlife Act 1974* or the *Brigalow and Nandewar Community Conservation Area Act 2005*.

MDEG considers that the Natural Resources Commission must take into account the impact of commercial timber harvesting activities on:

- woodland species of flora and fauna which inhabit Zone 3 areas;
- threatened species and endangered ecological communities;
- the high conservation value of the areas as contiguous remnant native vegetation in central NSW;
- healthy soils in an area of natural phenomenon; and
- the cumulative impact of such practices on a conservation area which can be subject to mining and petroleum activities

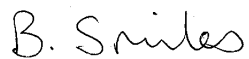
MDEG is also aware that Zone 3 areas are not covered by the Brigalow and Nandewar Integrated Forestry Operations Agreement.

Any requirement for improved adaptive management of cypress regrowth within Zone 3 areas should be conducted through programs developed by NPWS based on scientific research.

MDEG does not support the introduction of commercial timber harvesting activities within areas gazetted for conservation purposes. This will set a precedent across NSW that cannot be supported by the wider community.

Western woodland species are among the most threatened within Australia. Their habitats need to be protected from commercial activities.

Yours sincerely,

A handwritten signature in black ink that reads "B. Smiles". The signature is written in a cursive, slightly slanted style.

Chairperson
MDEG