

Natural Resources Commission
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SUBMISSION

Draft Report

Active and adaptive cypress management in the
Brigalow and Nandewar State Conservation Areas

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 lodged a submission in October 2013 providing comments on the assessment of adaptive and active management of cypress forests in the Brigalow and Nandewar State Conservation Areas (SCA) (Zone 3).

It is disappointing to note that the Natural Resources Commission (NRC) has basically ignored the issues raised in the original MDEG submission and has made a draft set of recommendations to the NSW Government consistent with opening up conservation areas in NSW to commercial timber harvesting operations.

The discussion of prescribed burning in Table 1 as an active management tool refers only to existing programs of property and asset protection. The opportunity to use controlled mosaic burns as a tool to manage dense cypress regrowth has not been clearly identified in the draft report recommendations. This is despite the fire management tool being raised as an option in many submissions and the recognition of this being the most cost effective method of actively managing white cypress regrowth.

1. Response to draft recommendations:

MDEG does not support the following recommendations in the Draft Report:

Recommendation 1: introduction of grazing within SCAs cannot be clearly identified with improved ecological outcomes, the retention of current prescribed fire practices to protect property assets should be broadened to include active management of class 2, 3

and 4 cypress stands in controlled mosaic burns. The principles set out in table 24 will not adequately manage commercial timber harvesting activities.

Recommendation 2: The elements of an adaptive management framework can be included in the existing Plan of Management process without creating an entirely new process that needs to manage commercial activities within SCAs

Recommendation 4: MDEG vehemently opposes the seeking of secondary commercial benefits from a SCA

Recommendation 5: MDEG opposes the proposed changes to NSW and Federal legislation to facilitate the commercialization of activities within SCAs

MDEG wishes to submit comments on the following recommendations:

Recommendation 3 – as noted above, the process of developing Plans of Management for SCAs is already in place. This important activity needs to be better resourced through the National Parks and Wildlife Service (NPWS) budget. An overarching Adaptive Management Plan for the region is not necessary

Recommendation 6 – The NSW Government adoption of the *Brigalow and Nandewar Community Conservation Act 2005* was in response to expressed community desire to have cross tenure and cross sectorial participation in decision making of the management of the four zones identified within the Act. This arrangement through the Community Conservation Area Advisory Committees provided the input described in this recommendation. The NRC is countering the negotiated agreement made through this process in 2009 by recommending commercial ecological thinning activities.

2. Comments on the Review findings:

2.1 Past white cypress pine management

The draft report fails to identify that the specific silvicultural program of the Forestry Commission to ringbark large eucalypts has caused a change to areas of forest type.

The plantation style management of forestry operations will not be solved by continuing to operate commercial logging in areas of dense white cypress within SCAs. There is enough evidence within areas of past forestry activity to demonstrate that cypress domination is not solved through harvesting programs.

The active suppression of wildfire to protect stands of white cypress has also led to an unnatural occurrence of this vegetation type within the areas under assessment.

The fact that white cypress is particularly sensitive to fire has not been clearly identified in the draft report. The use of fire as a management tool is outlined in Tables 19, 20 and 21. However, the fire strategy recommendations to NPWS provided on p 101 of the draft report do not carry through to any key higher level recommendations.

2.1 Current forest condition and future trajectories

MDEG is concerned that the NRC is proposing to commit commercial timber harvesting operations over 30% of the SCA area.

The conclusion that Goonoo SCA has large areas of dense white cypress is not supported by local community members with a good knowledge of that area. Table 18 (p92) notes that Goonoo SCA has 5 patches of class 2 white cypress density, 2 patches of class 3 and no patches of class 4. MDEG does not support the NRC recommendation that Goonoo SCA requires ecological thinning particularly on a commercial basis.

MDEG questions the NRC conclusion that climate change is likely to cause an increase in white cypress areas in the future. It is not clear within the report how this conclusion was made. Climate change is likely to increase wildfire events in the region thus controlling the re-emergence of white cypress in many areas.

2.3 Actively managing SCAs

MDEG fails to understand why the NRC would recommend grazing in SCAs as a method of managing cypress regrowth. The reason why this vegetation type has been classed as a woody weed or invasive native species on private land is because stock, particularly cattle, will not eat it.

Any introduction of grazing into SCAs will have a significant impact on the resilience of native grasses, erosion impacts on water courses and increase the threat of weed introduction into the area.

There are no identified ecological outcomes from grazing in natural areas and very little has been provided in the NRC report. The following statement in the report confirms MDEG concerns in regard to the proposal to reintroduce grazing into SCAs:

'A lack of comprehensive monitoring of – and data on – grazing impacts on white cypress pine forests has meant it is not possible to assess how livestock grazing affects conservation values or fire risk.' (p 97)

MDEG supports that active fire management be used as a tool to control cypress pine regrowth. It is the best and cheapest method of ecological thinning.

The reintroduction of commercial logging activities as an active management tool is completely rejected. The impacts of logging activities including roading, soil disturbance through machinery movements, damage to surrounding vegetation and the removal of old trees (stags) for safety purposes cannot be adequately managed through the principles of ecological thinning as outlined in Table 24.

MDEG rejects that the timber industry can be adequately managed to achieve ecological outcomes.

2.4 Adaptively managing SCAs

The draft report refers to the need to prevent the threat of degraded forests and plants and animals becoming endangered. MDEG wishes to point out that it was precisely the activity of commercial timber harvesting operations within the context of broadscale land clearing that has caused many plants and animals in the SCAs to become endangered.

The rigour of the Western Regional Assessment and the conservation model developed by members of the Western Conservation Alliance identified that the areas currently protected within SCAs were important remnant habitats for threatened plants and animals and the removal of commercial timber harvesting operations was essential to their future survival.

MDEG does not accept that within 9 years of these areas being protected from the damage of logging machinery that their condition is now threatening the recovery of threatened species.

2.5 Cost and potential cost recovery

MDEG is disappointed that the calculations associated with the cost of adaptive management that identify prescribed fire as the most cost effective management tool has not influenced the outcome of the NRC assessment for cypress management.

The draft report focuses specifically on the cost of managing commercial harvesting activities and expects the NSW tax payer to cover between 60% and 70% of these management costs. This is without any clear understanding of the ecological benefit to be achieved through the reintroduction of commercial timber harvesting operations and grazing within protected areas.

The suggestion that a 'goods for services' scheme be introduced does not appear to take in the additional costs of managing the scheme or of clearly identifying any ecological benefit. MDEG is of the opinion that any contracts under these arrangements would be impossible to manage in the remoteness of the SCAs under question. There is further concern that reduced supervision is identified as a cost saving (p 107).

The achievement of the principles of ecological thinning as outlined in Table 24 will be impossible to manage on the ground with commercial operations. MDEG experienced firsthand the difficulties in regulating the provisions of timber harvesting plans developed by Forest NSW. Breaches of the harvesting rules were common throughout the region.

2.6 Implications for local communities

MDEG notes that the draft report does not refer to the substantial restructure package provided to the communities of Baradine and Gwabegar as part of the outcome of the Western Regional Assessment.

This section of the report gives a strong impression that the NRC expects the commercial timber harvesting operations in SCAs, under the guise of adaptive ecological thinning,

will continue to occur indefinitely to provide support to communities that were declining prior to the final Western Regional Assessment decision.

However, it is highly likely that only one harvest of commercial size timber will be possible in any of the areas. The draft report identifies (Table 11 p62) that there are only 74 patches of white cypress greater than 500ha across the SCA estate.

The impact of roading, machinery & vehicle access and other disturbance caused by commercial harvesting operations will counteract any perceived benefits and add to the long term ecological costs. The issue of safety has been used regularly in timber harvesting operations to cause the felling of old stag eucalypts.

MDEG does not believe that the current value of the timber and particularly landscape materials can provide any long term economic benefit to local communities.

MDEG is also concerned that the draft report does not mention the issues of wood supply to the Gunnedah mill in this section.

It is noted that the modeling outlined in Table 27 (p107) is based on 7 years of timber harvesting. MDEG is concerned that the scale of timber removal identified ie 1,000m³ – 14,000m³ per annum of saw logs and 1,800m³ – 23,000m³ per annum of landscaping products is significant and cannot be justified under the guise of achieving ecological outcomes.

2.7 Implementing active and adaptive management

MDEG strongly opposes the recommendations to amend a range of state and federal legislation to legalise the commercial use of native vegetation harvested in SCAs.

The fact that the NRC has recommended this approach is an abrogation of responsibilities. If the NRC is not prepared to protect natural areas from commercial exploitation there is no hope for the future of biodiversity in NSW.

MDEG does not support the methodology outlined to develop an overarching Adaptive Management Plan that allows for management of commercial activities within SCAs in the Brigalow and Nandewar bioregions.

The current *Brigalow and Nandewar Community Conservation Area Act 2005* has provisions for regional officers of different land tenures and community stakeholder groups to co-operate within Community Conservation Area Advisory Committees. The current NSW Government ceased funding these committees.

MDEG doubts that the goodwill and co-operative relationships that occur at the regional level will be maintained if commercial activities are introduced into SCAs in the region.

MDEG recommends that the adaptive management of white cypress through controlled mosaic burns be implemented through the Plans of Management for the 30 % of SCA

areas identified to have dense white cypress regrowth. This can be managed through existing arrangements with community based advisory committees in conjunction with the National Parks and Wildlife Service Landforms and Rehabilitation Team.

MDEG supports ongoing monitoring and evaluation of adaptive management for ecological improvement in protected natural areas across NSW. However, MDEG does not support that adaptive management include commercial activities within these areas.

MDEG is of the opinion that the required consideration of the objects of the *National Parks and Wildlife Act 1974* will not be met through the recommendations of the draft report and that it will be impossible to achieve the stated aim that:

'opportunities for cost recovery or other commercial benefits must be a secondary consideration to the promotion of improved ecological, cultural and recreational outcomes.' (p 15)

Particularly in the context that:

'The thinning regime would need to include a certain amount of larger trees (production volume) to make the activity commercially attractive' (p 115)

MDEG does not support the direction recommended by the NRC for the future active and adaptive management of white cypress in the Brigalow and Nandewar SCAs.