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# **Submission**

to

## **Inquiry into Management of Public Lands in NSW**

Compiled for Clarence Environment Centre  
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Honorary Secretary  
30<sup>th</sup> July 2012

# Submission to the Inquiry into Management of Public Land in NSW

## Introduction

The Clarence Environment Centre has maintained a shop-front in Grafton for over 22 years, and has a proud record of environmental advocacy, which has focused on conservation and the protection of biodiversity.

## Overview

The Inquiry into Management of Public Land in NSW was initiated by two political parties, the Shooters & Fishers, and Nationals, that have always made no secret of the fact that they are opposed to the concept of conservation reserves that “lock-up” what they see as resources. Those Parties are driven by self-serving ideals that include the exploitation of that land for various recreational pursuits, and commercial opportunities.

Primarily, the Shooters and Fishers Party want access to all public land by sporting shooters to hunt a range of native and introduced animal and bird species, while the National Party wants to allow logging, mining and cheap grazing leases in national parks. The extreme damage to ecosystems and loss of biodiversity that result from all the above activities is only too clear and well documented.

## Critique of the Terms of Reference (TOR)

The Clarence Environment Centre will focus on the north coast, an area where we have specific involvement with the management of public lands.

**TOR 1.** *The conversion of Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas, including the:*

*a. Process of conversion and the assessment of potential operational, economic, social and environmental impacts.*

**Comment:** As far as we are aware, no private land was annexed for conversion to national park, the National Parks and Wildlife Service, through to the OEH today, will only consider the acquisition of land that is freely offered to them, and refuse to even approach private landowners with such a proposal.

About a decade ago, considerable areas of vacant crown land was transferred to the national parks estate, predominantly as nature reserves. Most of that crown land was still vacant, simply because it was undesirable for farming or timber production and hence had never been taken up by the early free selectors.

*b. Operational, economic, social and environmental impacts after conversion, and in particular, impacts upon neighbours of public land and upon Local Government*

**Comment:** Much of the crown land that was converted to national park had traditionally been used by neighbours to graze their cattle at extremely low rental rates, and the cessation of this 'perk' has angered those neighbours, who have sustained a 'hate' campaign against the NPWS ever since, blaming the service for all manner of mismanagement, little of which is justified.

Part of that hate campaign has included claims that the Parks service does not pay local council rates. Nor do Forests NSW pay council rates on the NSW forest estate for that matter, but seldom do we hear the same complaints.

However, this is an impost on some councils such as the Clarence Valley Council

which has a very high percentage of its LGA under public ownership. We believe this imbalance should be addressed.

*c. That the following cases be considered in relation to Terms of Reference 1(a) and 1(b):  
River Red Gum State Forests in the Southern Riverina, Native Hardwood State Forests in Northern NSW, Yanga Station in Wakool Shire, and Toorale Station in Bourke Shire.*

**Comment:** As stated earlier, the Clarence Environment Centre (CEC) cannot comment on issues in other areas of the state. However, we do have significant knowledge about the hardwood forests in Northern NSW. Having said that we are unclear whether 1.c relates to the management of State Forests, or those that were transferred to the national parks estate. For this comment, we will assume it is the latter.

As already mentioned, the CEC, and its individual members, have had significant involvement in the management of national parks in our region, both on a voluntary and professional basis. Therefore, we can assert that, in general, all the state forests that were transferred to the national parks estate as a part of the Regional Forests Agreements, were heavily logged prior to their hand-over. Parks such as Ramornie National Park, where the CEC undertook an official flora survey as part of the development of a Plan of Management, is still suffering from weed invasion that was exacerbated by that extreme logging event, and would not provide a commercially viable timber resource for several decades to come.

In terms of biodiversity, that recovery could take up to 50 years. Already Bell Miner Birds have taken up residence in the Lantana thickets, and the Bell Miner Associated Diaback (BMAD) has already begun to occur in the neighbouring Ramornie State Forest as a direct result of logging regimes that remove in excess of 70% of the canopy. When determining BMAD to be a Key Threatening Process in 2009, the NSW Scientific Committee clearly identified canopy loss above 35% as being a trigger for the disease. Yet Forests NSW continues to log an average 40% of basal area, that equates to 40% canopy loss at the very least, but which in reality sees much of the forest virtually clear-felled, because of loopholes in the legislation.

A major loophole is the failure to specify a minimum return intervals between logging events. In Compartment 90 in Clouds Creek State Forest, logging is currently being undertaken for the third time in 3 years, taking timber from areas that were left previously as an offset that allowed 80% basal area logging to occur.

**TOR 2.** *The adherence to management practices on all public land that are mandated for private property holders, including fire, weed and pest management practices.*

**Comment:** There has always been complaints about the management of public lands, particularly from those neighbours of national parks who, as explained earlier, had traditionally enjoyed the use of that land. In many cases those complaints are legitimate, but are generally aimed at national parks rather than state forests because forest neighbours still enjoy the benefits of cheap grazing leases. Unfortunately that has resulted in high frequency fire regimes conducted surreptitiously by the graziers attempting to improve grazing conditions. This of course is a disaster for biodiversity, and does nothing to promote effective regeneration of timber. Yet, rather than incur the wrath of those same national parks detractors, Forests NSW and the State Government continue to allow grazing to occur in many state forests.

Introduced species, particularly flora, are the greatest threat to our ecosystems, and landowners that are told to remove an invasive weed from their properties, while adjoining public land remains untended, have every right to question why. However, it is not the local forester, or park ranger that is to blame, it is successive state governments that have abrogated their responsibility, and failed to adequately fund control and eradication programs.

**TOR 3.** *Examination of models for the management of public land, including models that provide for conservation outcomes which utilise the principles of “sustainable use”.*

**Comment:** The term “sustainable use” is one that is always used when someone wants to exploit a sensitive resource, and in this case is clearly aimed at timber. However, we believe that when it comes to the natural environment, any disturbance has consequences which will most likely be a negative impact on the environment. Therefore, we assert that sustainable use of native forests for timber production is a myth.

We do believe that forests that have already been logged, and disturbance has already occurred with the obvious consequences of reduced biodiversity, and increased pest species, can continue to be logged on a sustainable basis. But that sustainable level requires a greatly reduced level of exploitation. Logging rates must be drastically reduced to no more than 15% of basal area, and greatly extended rotation rates, a minimum of 20 years, ranging upwards of 30 years in less fertile areas. In that way, truly EFSM will be achieved and will ensure ***“that the values of forests are not lost or degraded for current and future generations”***.

We find the inclusion of **TOR 4.** is scary, and allows any extremist view to be considered. As there is nothing specific, we cannot comment on it other than to say it should be deleted.

## **Climate Change**

No land management policy can ignore the 'elephant in the room' which is climate change. In combating that threat, management practices that encourage the maintenance of healthy ecosystems is paramount.

Biodiversity management plans, at federal, state and local government levels all open with statements that acknowledge that mankind cannot survive without biodiversity, and emphasise that **all the food we eat, and most of the clothes we wear are direct products of biodiversity.**

Growing and enhancing forests will help reduce carbon dioxide adding to atmospheric pollution by storing that carbon and providing life-giving oxygen. Clearing forested land for any purpose makes no sense.

## **Grazing.**

Grazing impacts by a variety of hoofed species are well known, being listed as various key threatening processes, and identified as a major contributor to threatened species decline across the country.

Observations in State forests, where grazing is still widely practiced, have revealed that there is a greatly reduced understorey diversity, and suppressed regeneration as a result. Further more, during dry periods cattle congregate in drainage lines, and along creek and gully banks, trampling riparian vegetation, increasing gully vegetation's vulnerability to bushfire, causing erosion, and turning pristine pools into mud wallows.

## Logging.

The term “sustainable”, when associated with the management of forested land for logging, has proved to be a meaningless joke, both when used to support logging in native forests under the Private Native Forestry Code of Practice, and the Regional Forests Approvals. “**Ecologically Sustainable Forest Management**” (ESFM), is supposed to underpin the Integrated Forests Operations Approval (IFOA) and is defined as:

*“The management of forests so that they are sustained in perpetuity for the benefit of society, by ensuring that the values of forests are not lost or degraded for current and future generations.”*

Despite this grandiose claim, it is widely accepted that the logging practices currently being adopted are anything but sustainable, as evidenced by the following quotes:

1. The Institute of Foresters of Australia – Letter to Rob Oakeshott, 2009:

*“In NSW the adopted forest strategy is to **unsustainably cut** the available public native forest through to 2023 at which point hardwood plantations are proposed to be available to make up the very significant shortfall in logs. Unfortunately, the species mix and rate of plantation development in NSW post 2000 makes this unachievable”.*

2. Dailan Pugh, RFA negotiator, July 2011.

*“Timber volumes were intentionally committed above the estimated sustainable yields in north-east NSW by both the FAs and RFA.*

The fact that Forests NSW have drastically overestimated the available timber volumes, is simply compounding the problems now being faced.

3. The Environmental Defenders Office – Executive Summary, of its report - “**COMPLIANCE FAILURES IN THE PUBLIC FORESTS OF NEW SOUTH WALES**”, July 2011.

*“It is clear that native forests are not being managed in a way that complies with the principles of Ecologically Sustainable Forest Management (ESFM) and the conservation of biodiversity.”*

4. The Victorian Department of Primary Industries - “Economic Policy Settings in the Forest and Timber Industry – An inter-jurisdictional comparison”, May 2008.

*“There is concern that Forests NSW will not be able to meet commitments in Wood Supply Agreements with the current forest areas allocated for commercial forest production. This is evidenced through the fact that Forests NSW is purchasing private native forest resources to meet current commitments.”*

5. The NSW Auditor General - “2009 Performance Audit”:

- a) *To meet wood supply commitments, the native forest managed by Forests NSW on the north coast is being cut faster than it is growing back.*
- b) *The North Coast region has been unable to meet its species commitment since 2004 for blackbutt (the North Coast's most logged species, at 24%).*
- c) *current yield from native forests in the north coast is not sustainable in the long term.*

6. In 2005, Boral was compensated to the amount of half a million dollars for short supply of timber in NSW. That same company is currently in dispute with the NSW Government claiming further compensation amounting to a sum rumoured to be in excess of half a billion dollars.

Forests NSW has been losing money for years, and all of this is being paid for by the taxpayers of NSW, while the forests themselves are being degraded as never before. As one person described it, *“this is a scandalous redistribution of wealth from the people of NSW to Boral and other timber industry heavyweights”*

An estimated 90% of all timber product from Australia is sold as wood-chip, mostly exported at 'give-away' prices while forests, both public and privately owned, are being decimated. Any suggestion that this supposed ecologically sustainable logging should be extended into conservation reserves will simply increase the availability of timber and see ever greater volumes of wood chipped and other low value products shipped off-shore, burned to generate electricity and add to pollution.

We believe part of the problem with the management of state forests is the price of timber. Put simplistically, double the price, and you halve the demand, and make forestry more sustainable and viable.

In every logging operation, you will find rejected logs, huge piles of offcuts, and tree crowns with large amounts of wood that could be salvaged if it was economically viable to do so. Make wood more expensive, and the waste will drop significantly.

At the same time we believe the destruction of native forest for low value product, particularly export wood-chip, has to cease. Taxpayers should no longer be required to subsidise the industry's waste.

## **Mining.**

There will always be a need to mine. However, given what we know about greenhouse gas driven climate change, the need to open more coal mines, and expand the gas industry, particularly unconventional gas, has long since passed. The time has come for a serious move to renewable energy sources, not the polluting energy sources that have led the world to the edge of disaster.

The recent NSW Government Inquiry into coal seam gas acknowledged that unconventional gas is as polluting as coal when used as an energy source. At the same time the International Energy Agency, in its “Outlook 2012”, warned that the world is on track to achieve a catastrophic level of climate change within 90 years, with temperature levels rising by a mammoth 6 degrees.

Australia is currently the world's largest exporter of greenhouse gas emissions, **and that absolutely has to stop, and a policy of NO NEW COAL MINES, and a halt to ALL unconventional gas mining, would go a long way to achieving that.**

Water quality is critically important to Australia and the world. There can be no excuse for mining of toxic minerals like antimony and gold in urban water supply catchments such as is currently proposed for the Coffs Harbour – Clarence Valley regional supply catchment.

To protect aquifers and ground water generally, it is imperative that the process of hydraulic fracturing of underground rock layers must be banned on private as well as public land.

## **Pest Control**

Pest control should be addressed equally across all tenures. It is important that pest animal control be conducted **humanely and professionally**, and not undertaken on any public land by a bunch of part time amateurs (sporting hunters).

Likewise the protection of invasive pests, such as deer, under the auspices of the NSW Game Council must be stopped. **That extreme organisation should be disbanded altogether, a move that would make a direct saving to the Government of more than \$7 million dollars annually which is currently a direct impost on taxpayers after shooting licence fees are collected. There is no place in the Australian environment for “game” species to be protected to provide a sport for hunters.**

Pig-dogging and like practices should be made a criminal offence, and hunting with dogs should be banned altogether in areas where there is an occurrence of threatened species that are vulnerable to dog attack; i.e. koalas.

In terms of invasive weeds, it is important to note that exotic species do not thrive in a healthy untouched forest. It is only when that forest is disturbed by activities that remove trees (logging, infrastructure provision, housing development etc) that weeds take advantage of additional sunlight, and human vectors such as uncleaned machinery, to proliferate, and in many cases take over completely (for instance Cat's Claw, Lantana, and Morning Glory vine).

Pest control should be addressed equally across all tenures.

## **Eco Services**

It is important to place a value on native forests other than timber volumes. Currently, no value is attached to forests for the eco services they provide, and we believe this is an imperative. Calculate the value of the oxygen produced, a vital element to the survival of all life on earth, by considering what it would cost to do mechanically what the forests provide completely free of charge. Likewise, what is the value of the clean water we drink, again courtesy of undisturbed forests that filter that water for us?

Pristine forests also attract tourists which provides enormous economic benefits for local communities and the state, far more than the timber industry. Likewise, employment numbers involved in tourism greatly outnumber traditional forest industries. No tourist visits to view a trashed forest.

## **In conclusion.**

- 1. We believe that it is critically important to protect and enhance biodiversity, and that grazing, mining and logging, which are all identified as major threats to biodiversity, should not, indeed must not be undertaken in any national park or other conservation reserves.** Likewise, highly destructive recreational activities such as hunting, 4 wheel driving, and other motorised activities, horse riding and mountain biking must also be banned.
- 2. To protect biodiversity and water quality, grazing activities must be excluded from all publicly owned forests.**
- 3. With a world where hunger affects more than half a billion people, potential agricultural land held by the public estate must be conserved, and protected from mining, subdivision, and infrastructure provision, or any other development, including plantation establishment.**
- 4. Urban water supply catchments must be protected from mining, and excessive forestry.**
- 5. Timber prices must be increased to reduce demand and waste.**
- 6. To protect biodiversity, there is an urgent need to transition to plantation timber. However,**

**suitable siting of plantations that do not impact on groundwater or prime agricultural land is critical.** In developing hardwood plantations, multi species wood lots are preferred to lessen the impacts of insect and fungus attacks that plague monocultures, and prevent the pollution resulting from clear-felling.

7. **Local Government should not be disadvantaged by the failure of public land to contribute to their rate base,** being ever mindful of the tourist dollars being injected into the community by tourism, attracted to the area by national parks and wilderness, and the jobs created through conservation and land care, and other flow-on benefits.
8. **It is important to note that invasive exotic species do not thrive in a healthy untouched forest.** Disturbance must be minimised or avoided, and **maintaining healthy ecosystems on public land must be a priority.**
9. **Pest control should be addressed equally across all tenures. It is important that pest animal control be conducted humanely and professionally, and not undertaken by a bunch of part time amateurs (sporting hunters).**
10. **The NSW Game Council must be disbanded, a move that would provide a direct saving to taxpayers of more than \$7 million dollars. There is no place in the Australian environment for “game” species to be protected simply to provide a sport for hunters.**
11. **It is important to place a value on native forests for the eco services they provide completely free, rather than simply the timber volumes, as is the current case.**
12. **With the reality of climate change, it is imperative that we preserve as much carbon as possible in growing forests.** Forestry practices that include regular burning of logging residues have to stop, and timber extraction rates, particularly for products like wood-chip, that have a short carbon life, must be drastically reduced, **and stopped in native forests completely.**
13. **Healthy forests support a healthy biodiversity.** Current over-logging, grazing, high frequency fire regimes, are massively detrimental to biodiversity. Therefore all steps should be taken to preserve, and improve, biodiversity levels. Biodiversity supports the very fabric of our existence as a species. **All the food we eat, and most of the clothes we wear are direct products of biodiversity.**
14. **Mining of all types should remain excluded from national parks, and that ban extended to all conservation reserves, while coal seam gas mining must be banned entirely across all tenures.** The International Energy Agency warned us in January 2012 that continued burning of coal and coal seam gas has us on track for a 6 degrees of warming within this century. That is a level of catastrophic climate change which we will bequeath to our grandchildren.

We thank you for the opportunity to comment.

John Edwards  
Honorary Secretary.