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**Nature Conservation Saves for Tomorrow**

**28<sup>th</sup> July, 2014**

**Natural Resources Commission**

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## **BMCS Submission in Opposition to Active and Adaptive Cypress Management in the Brigalow and Nandewar State Conservation Areas**

### **1. Introduction**

The Society has a membership of around 850. It is particularly committed to preserving the natural environment of the Greater Blue Mountains region and to ensuring parts of the Gardens of Stone area are reserved as State Conservation Areas (SCAs) and National Park extensions. However, the Society also has a broader interest relating to any changes in the use of SCAs and National Parks (NPks), to the extent that they may comprise matters of principle, may potentially negate past practices, and may involve 'trials' which (if deemed successful) could be the prelude to their much wider adoption in SCAs and NPks.

### **2. The Society's Position**

The NRC's Draft Report on Active and Adaptive Cypress Management in the Brigalow and Nandewar State Conservation Areas very much falls into the category of negating principles and past practices, and creating adverse precedents which could have implications for other SCAs and NPks.

According to the NSW Office of Environment and Heritage:

*"The State conservation areas are lands reserved to protect and conserve significant or representative ecosystems, landforms, natural phenomena or places of cultural significance, while providing opportunities for sustainable visitation, enjoyment, use of buildings and research."*

As has long been the case, the emphasis is on the roles of SCAs in environmental conservation and preservation as paramount functions. It is absolutely fundamental that these roles in no way be usurped for economic and/or political expedience. Should these roles be in any way compromised, and it would seem that this is the intention behind the NRC's draft report, such actions would stand as a severe indictment of the present government's environmental credentials. It is all too easy for governments to relax a commitment to environmental principles under pressure from focused vested interests and superficial 'input/output' economic arguments.

By recommending that the logging of White Cypress Pine (under the guise of ecological thinning), coupled with grazing and controlled burning practices, be undertaken within SCAs, the NRC is legitimising environmental vandalism.

By recommending that such logging and associated practices be structured to ensure commercial viability, the NRC is financially rewarding environmental vandalism.

**The Society considers the NRC's proposals to be totally against the principles on which SCAs were established. It therefore rejects the draft report and, in doing so, notes that if the NRC is responding to or is constrained by the terms of reference, then the government has a duty to rescind, or at least modify, the terms of reference.**

### **3. Specific comments**

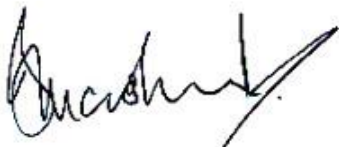
- In May 2005 the government created SCAs in the Brigalow-Nandewar region to protect 60,000 hectares of rare, vulnerable and endangered ecosystems from logging and grazing. The protected hectares encompassed habitat for 47 endangered species of fauna such as the Turquoise Parrot, the Barking Owl, Mallee Fowls and the Swift Parrot. **The resulting SCAs comprise only about 2.5% of the Brigalow-Nandewar region, so notionally 97.5% of the region remained for exploitation by the logging and grazing industries.**
- To enable SCA reservation, the taxpayers of NSW provided \$51 million in compensation for protecting this 2.5% of the Brigalow-Nandewar region from logging and grazing. It is absolutely ridiculous to pay such a sum in compensation and then, less than 10 years later, open the SCAs to the self-same destructive logging and grazing practices! **This would be the most outrageous waste of taxpayers' funds, would constitute a monumental backflip, and would/should be grounds for an independent judicial investigation.**
- The provisional plans involve 'winning' 1,000 to 14,000 cubic metres of sawlogs and 23,000 cubic metres of landscape products a year from the SCAs. Translate this into tracks, trucks and heavy equipment movements, 'borrow' areas, and noise pollution, and it becomes blindingly obvious that this is a recipe for environmental mayhem. **They may be 'winning' a resource, but the environment's 'losses' would be disproportionately much greater.**
- The NRC would seem to be operating in sympathy with a political agenda. In May 2005, then Opposition Deputy Leader, Andrew Stoner, promised to overturn the decision to reserve part of the Brigalow Belt South Bio-Region. He is effectively attempting to 'honour' this commitment (a component of the National Party policy) by 'focusing' the findings of the NRC. Logging the SCAs has no conservation value, but is 'needed' in order to support a moribund timber industry. **One might argue that this is a classic case of the end (deferring the shut-down of a terminal industry) justifying the means (environmental sacrifice), but in terms of our future, the reverse is the case: the end is environmental desecration and the unjustified means involve acceding to the wishes of an industry which refuses to curtail its appetite!**
- The NRC's arguments offered in justification of the proposed and costly backflip (dot-point 2, above) are totally unconvincing:
  - Claims that cattle grazing reduces weed-infestation and lowers the fire-risk have little or no scientific basis when placed in the context of protecting habitat – **taking the argument to the absurd, covering everything with 15 cm of concrete would be similarly efficacious.**
  - Claims that White Cypress Pine trees are an invasive native species such that they must be thinned to enable development of better habitat are an amusing distortion of reality. The \$41 million timber industry restructure fund linked to the 2005 conservation decision enabled thinning of white cypress pine to improve the quality and growth rate of these trees for wood production in state forests; this is far removed from creating endangered ecosystems. **In fact, the notion that this same approach will enhance the ecosystems in protected woodlands is ludicrous!**
  - **Claims that the NPWS regional managers will manage/supervise commercial logging and grazing in the SCAs and thereby ensure satisfactory conservation outcomes are misleading.** The 'management committees' controlling operations will have representatives from NPWS and the grazing and logging industries; the latter two industries will have little commitment to damage limitation, whilst the NPWS representative(s) (having seemingly 'accepted' a need for commercial outcomes) will be powerless. It's not rocket science: **logging and grazing are diametrically opposed to conservation management – requiring NPWS personnel to co-manage the effective**

**destruction of protected ecosystems is opposed to everything the personnel and their organization should be standing for.**

- Claims that to sustain the logging industry and its sawmills there must be a guaranteed resource are simplistically true, but disregard reality. The logging and sawmills needs were catered for in the 2005 restructuring fund (see two ‘wingdings’ above). If the industry has over-cleared private lands and exhausted the potential of state forests, it is clear that instead of adjusting to the decline of a renewable resource, there has been no attempt to scale back this industry to match the renewable resource’s growth rate. The net result is that the industry, having gobbled up the available funds and resources, has now returned cap in hand asking for access to those stands of White Cypress which have been set aside in reserves. **The industry will never be satisfied! The industry has no intention of operating within the constraints of the growth-rates applicable to the White Cypress renewable resource; exploit now and whinge for more is the only plan on offer!**
- Claims that the proposed logging (i.e., thinning) in the SCAs will provide an ‘economic’ source of electricity, if used in a wood-fired electricity plant, do not withstand investigation. The NRC’s own data show that **the process isn’t viable unless it is subsidised by the taxpayer and treated as a form of ‘green energy’ in terms of the renewable energy target; yet such treatment would be totally unjustified.** Thus: wood as an energy resource creates a ‘carbon debt’ because it releases more atmospheric CO<sub>2</sub> per unit of energy than is derived from oil, coal, or natural gas – hardly a recommendation; woodland suffers a net loss of carbon due to the lag (in the order of 50-100 years) between logging and consuming wood-fuel as opposed to locking up the equivalent amount of carbon through new tree-growth; and the combined carbon debt and lag effects increase the GGE rather than reducing them as is the case with true renewable resources such as wind and solar power.

#### **4. Conclusion**

The Society believes that the NRC’s draft report, whether or not constrained by its terms of reference, is politically expedient. It attempts to produce a case in support of the logging and grazing industries accessing SCAs for commercial gain. Yet, in doing so, it disregards the May 2005 agreement which placed these industries on notice and provided funds to facilitate operational changes. These industries have made no obvious changes and, as in 2005, are arguing that the sawmills’ needs should be paramount. This was rejected than and has no place now.



***Dr Brian Marshall,  
For the Management committee.***