INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN NEW SOUTH WALES

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The Hon. Scott MacDonald M.L.C. Parliament House, Macquarie Street, SYDNEY NSW. 2000

> Re: NSW Legislative Council General Purpose Standing Committee No. 5 Inquiry into the management of Public Land in New South Wales.

Dear Sir,

I refer to your letter dated 30th May, 2012 in which you invited the Branch to make a submission to the above inquiry and thank you for the opportunity to do so. We note with some concern the apparent narrowness of the Terms of Reference; however, we provide the following responses in good faith.

Introduction.

In considering the Terms of Reference it should first be noted that in terms of nature conservation in Australia, the State of NSW when compared to most of the other States of the Commonwealth, is at present not particularly well endowed with land reserves dedicated to nature conservation, despite the efforts of government over the last decade or so. While NSW has a little under 9% of its total land area dedicated to nature conservation it is a long way from achieving the recognised international minimum of 15% and lags substantially behind the other states, i.e. Victoria (in excess of 13%), Tasmania (in excess of 30%), South Australia (in excess of 12%), Western Australia (in excess of 15%) and the ACT (in excess of 30%) with, unsurprisingly, only Queensland achieving less than NSW. A further deficiency apparent in the NSW system of conservation reserves is that they are disproportionately representative of the south east corner of the State and the Sydney – Newcastle Region. Most if not all of the arid and semi arid west of the State is poorly represented within the conservation estate e.g. only 3.2% of the Riverina Bioregion is conserved in conservation reserves. Similarly the Darling Riverine Plains has 2.4% reserved, the Western Slopes Bioregion 2.1%, the Broken Hill Complex 2.0% and the Cobar Peneplain 2.4%.

Considering the above, the Branch considers that the forest parks of the North East Forest Agreement and more lately the River Red Gum Forests, wetlands and arid woodlands/shrublands which also include Toorale National Park and Murrumbidgee Valley National Park (Yanga) form a critical part of the NSW conservation estate. Their acquisition is both appropriate and timely particularly as they act to conserve such undeniably significant ecosystems which are generally under threat and are now becoming a very scarce natural resource in New South Wales. While, by virtue of its location in Coastal NSW, this Branch has had significant involvement with the Lower North East Forest Agreement and the resulting Forest Parks, it has not had such an intimate involvement with the recent establishment of Yanga National Park near Balranald and Toorale National Park near Bourke nor the Riverina Red Gum Forest Parks of the Murray and Murrumbidgee Valleys. Despite this however, due to the intimate involvement of the Branch in a similar acquisition process involving the Curracabundi National Park Group in the Gloucester Shire, we feel that similarities in acquisition policy are such that we have an appropriate basis on which to comment. The Curracabundi Group included joint Commonwealth and State funding for the acquisition by purchase of large areas of marginal grazing lands consisting of dry forests, woodlands and grasslands generally held in freehold and Crown Leasehold tenure. Core areas of Crown Land were also included.

(1) While the terms of reference of the Inquiry group the parks together it needs to be understood from the beginning that the acquisition of Toorale and Yanga Stations was essentially a different process to that involving the acquisition of the Riverina Red Gum Forests and the Native Forests of the North East, principally involving the conversion of existing State Forest Estate to conservation reserves. It is therefore proposed in terms of 1 (c) of the terms of reference to consider the separate processes as follows:-

The Establishment of Yanga and Toorale National Parks.

It is noted that both these parks were established as a secondary consequence of the purchase of water licenses by the Commonwealth Government as part of the Murray-Darling River water by-back strategy. As such, the irrigation water values of both properties was the significant factor in the purchase with the residual value of each property being significantly less once the water rights became alienated. However, considering the extremely good condition of much of the native vegetation on the two properties due to historically low stocking rates, their nature conservation values exceeded their commercial value and accordingly they were purchased for inclusion in the NSW conservation estate.

In light of this, the purchase of the water licenses by the Commonwealth can be seen to have had the major economic and consequent negative social impact on local communities rather than the establishment of the two National Parks. It is our contention that the establishment of the parks would in fact over time negate against any such negative social and economic impact and would provide, in their own right, a positive economic stimulus to local communities. The capacity of National Parks to act as a drawcard and focus for on and off park tourism is well understood and documented.

It is perhaps not so well understood that the purchase of the two parks was not coerced but rather involved a voluntary offer of sale by the vendors. The purchase of the properties was at market value with terms that clearly benefited the vendor in both cases. This was particularly evident in the case of Yanga National Park where the historic context of the original Yanga Homestead was permanently secured as part of the contract of sale. Other benefits not normally available to a vendor included payment of reasonable legal costs by the Crown and delayed vacant possession of up to two years to allow removal of stock in an orderly way thus minimising economic impact on the vendor as a consequence of an adverse livestock market or seasonal or supply constraints. It is further noted that arrangements were made with the vendors of Yanga Station to delay vacant possession to allow harvesting of existing crops to occur .In the case of high value cropping land originally included in the purchase of Yanga Station, a decision was made by NPWS to exclude this land from the National Park dedication, subsequently returning it to agricultural use thus, further reducing impact upon primary production and the local community.

While the tenure changes signalled significant change in future land use and thus potentially some initial negative economic impact on the local community, this was generally limited as a consequence of the timely injection of Federal and State Government funding in the form of start up and ongoing recurrent funding particularly with consequent investment in staffing, infrastructure maintenance and asset building. Significant and very positive impacts on the local community arose as a result of the initial provision of temporary park management staff and subsequently permanent staff providing new opportunities for members of the local community with preference being given to individuals potentially displaced by the decision to create a new park. Asset works undertaken to facilitate tourism e.g. picnic and camping facilities were sourced locally with a further boost to local suppliers and contractors (A policy of NPWS).

There is an interesting twist resulting from the establishment of these two National Parks in that the public has now been given access to lands that hitherto they have been barred from entering into. The public now has the opportunity to visit thus benefiting from a significant natural recreation or camping experience. Prior to this these areas were "locked up" being closed to the general public.

Tourism – A stimulus and a diversifier.

Tourism can be a saviour to many small and remote rural communities as it generally brings with it a greater demand for local services and a consequent stimulus to local employment. In particular it can act to slow the steady loss of small rural populations to larger regional centres by stimulating the local economy such that critical basic community services can be retained. Tourism however depends on the creation of diverse and interesting destinations that will hold the interest of the tourist and cause them to spend time within the community; the longer the better.

The impact of tourism on rural communities is very dependent on the capacity of a community to embrace change and to some extent its success will be measured by the character of the community and its willingness to diversify thus promoting and better utilising the best of its existing attributes. The creation of new National Parks, particularly those which have obvious scenic and recreational potential, have the potential to become tourist hubs with added advantages of attracting a returning patronage.

A good case in point is the Gloucester Shire on the Upper Hunter Region. This small town of approximately 5,000 people was faced with a significant downturn in its economic fortunes as a result of the restructure of the dairy industry together with consolidation and restructure of the local hardwood timber industry following the implementation of the Lower North East Regional Forest Agreement. Rather than capitulate to its fate, the local community through the strong leadership of its Council, quickly grasped the potential for tourism that new National Park areas that were being established within the Shire, could bring. As a result of pressure from the community, government was encouraged to invest in the provision of significant infrastructure within these parks ensuring that the existing drawing power of the Barrington Tops group of parks was enhanced and integrated with off park tourism. Tourism in the Tops has grown disproportionately to the decline of existing rural industries.

As a result of input from the tourist industry, the local community, and government at all levels, major tourist drawcards such as the Historic Copeland Gold Mine, Keramea Historic Homestead and major and very diverse recreation facilities within the Barrington Tops World Heritage Area (all within National Park areas) are now available and effectively underpin a permanent and profitable tourist industry. So closely does the local community and its tourist industry associate with these new areas of National Park that Gloucester is officially promoted as **"Base camp Barrington**

Tops"

A similar situation would appear to be occurring at Yanga National Park and the nearby Murray Valley National Park. As a consequence of an injection of asset funding, visitor facilities have been provided and the historic Homestead and Wool Shed have been opened to the public for the first time. The significance of the wetlands and their associated waterways together with tangible historic remains of the once great wool industry are now being heavily promoted by government and local tourism with the town of Balranald being the prime tourist destination and "base" for discovering "Yanga and the River Red Gums Myriad experiences".(Nature Scapes Edition 1, 2012). Over time the new parks have the potential to impact positively on the local economy thus negating any initial impact of their establishment.

The Establishment of the Riverina Red Gum Forest Parks and North Eastern NSW Hardwood Forest Parks.

Unlike the previously mentioned parks both these groups involved the conversion and transfer of existing reserved lands (Principally State Forest and Crown Land) as a consequence of Regional Forest Agreements sponsored by the Commonwealth Government and enacted by the State Government. Some of crown land and State Forests contained short term permissive occupancies or occupational permits which were either allowed to expire naturally or were terminated with compensation being paid to the permit holder according to improvements made. Many of these entitlements were supplementary to other agricultural holdings and were rarely utilised except spasmodically during drought time and then only at very low levels. The process of integrating the POs and OPs thus had little or no significant impact on local communities and the compensation paid advantaged some.

The Regional Forest Agreement process was undertaken in an attempt to create an adequate, comprehensive and representative network of conserved forest reserves within North East NSW and subsequently within the Riverine Red Gum Forests of the Riverina District of NSW. Prior to this process eucalypt forests were poorly conserved in the North East while Riverine Forests of the Murray and Murrumbidgee River systems were hardly conserved at all. The new reserves were selected on the basis of sound scientific principles following extensive surveys undertaken as a result of the Regional Forest Assessment process adjudicated by the Resource Assessment

Commission and undertaken by NSW State Forests and the NSW National Parks & Wildlife Service. The selection process was undertaken jointly by NSW State Forests and NPWS with input from both the timber industry and the conservation movement with the intent of creating an appropriate reserve system while maintaining a viable timber industry, albeit somewhat smaller and more efficient and value adding than it had once been.

Decisions regarding yield (including species type and stock diameter) were based upon expected growth rates and yield determined by forests NSW and was the basis on which it was determined that a future native hardwood timber industry would proceed on a sustainable basis. Within the North East significant areas of the forest estate converted to National Parks and the like were in the low yield category, often from slow growth high altitude areas or steep lands or drier areas where defects were common (often possessing high conservation characteristics) while many of the more accessible and faster growing coastal forests were maintained as forests for timber supply. The Red Gum Forests were selected somewhat differently with particular attention being given to the selection of icon areas that both provided an effective conserved reserve which, particularly on the Murray, allowed notional connectivity with the Victorian reserve system on the other side of the river. The new parks where possible also included those areas suitable for the continued recreational use of the river. Again however the principal object of the RFA was to create an effective reserve system while maintaining a smaller and more efficient local timber industry, still viable but making best use of the remaining resource.

As a consequence of the reduced area of State Forest there logically had to be a reduction in yield over time and thus significant injection of funds for industry adjustment was provided by government both State and Commonwealth. Many of the small, generally very old and often seen to be inefficient and uneconomical mills were supported to exit the industry while the larger mills were encouraged to value add and improve efficiency. These impacts on local communities had been predicted and to an extent quantified by a series of social impact studies particularly undertaken during and prior to the Regional Forest Assessment process in North East New South Wales. Principally as a consequence of these studies considerable resources were put to supporting displaced timber workers many of whom were seen at that time to be difficult to place in alternative employment. Many of these displaced workers came from small towns and villages where their income was critical to the economy and long term well being of their community.

Displaced timber workers and forestry workers were therefore given priority for redeployment as trainee field staff in both National Parks and occasionally State Forests. This scheme occurred throughout the RFA area and contrary to early opinion turned out to be an absolute success with the bulk completing their probation period and then becoming valued permanent staff. Many of these staff have since progressed through dedication and training and are now in supervisory positions, particularly within NPWS and are providing a greater contribution to their community than they could ever have done in the past. As an example six displaced timber workers from the Gloucester District were appointed to the local NPWS as trainee field officers in 1998 as a result of closure of one of the local mills following the RFA. Of that original six there are at least five that are still employed by NPWS, three of who are now in senior field positions.

Meanwhile, in order to help supplement local employment, moves were made by government to stimulate the tourist industry that serviced these small timber towns. As previously described, considerable input through government agencies was put into the development of funding strategies to provide and identify an extensive range of essentially new and attractive tourist destinations with high quality facilities, particularly within the new park system but also off park in conjunction with private enterprise. As a result of the determination of local communities to survive, together with the initial economic stimulation provided by government, the natural values of many of these areas have become such a drawcard that within very few years the timber industry, though in many cases still viable, has been locally eclipsed as a local employer by a nature and agricultural based tourist industry.

The Branch is accordingly well aware of the impact that the establishment of an adequate and representative system of conservation reserves in NSW has had on many rural communities. However, the process undertaken by government, though sometimes cumbersome and to some, hard to fathom, was in the long run to the best advantage of all, inevitably to benefit both the rural and urban community alike. Change is always difficult to manage and inevitably there will be some who will be negatively impacted upon for a time. It is the Branch's belief that in this process the people of NSW were definitely the winners with those individuals, not so well disposed, being compensated or otherwise supported.

2. Management Practices on Public Lands.

• Fire Management.

Contrary perhaps to common belief the conditions applying to the management of conservation reserves (National Parks) is essentially the same if not sometimes more arduous than on privately owned land, both being equally subject to the Rural Fires Act. It could be argued that unlike private landholders, the National Parks & Wildlife Service (NPWS) and to some extent other government agencies (State Forests NSW, NSW Lands.) have a greater responsibility as they must consider the safety and well being of those members of the public accessing and using the particular reserve area.

As a result of its principal role as a land manager, the NPWS has developed into a primary fire response agency and is particularly well adapted to remote area fire management and has developed a specialist air insertion and air attack capability which is critical for successful fire management in remote areas of NSW. It has effectively integrated with the NSW Rural Fire Service (RFS), particularly in response to major fire hazards. About 80% of all NPWS staff are qualified fire fighters who regularly are involved in wild fire suppression and fuel hazard reduction control. Due to its decentralised nature and built-in mobility, the NPWS can rapidly deploy units anywhere in the state albeit in recent times, interstate and overseas.

Following establishment, each National Park is required to have a statutory Reserve Fire Management Plan prepared for it. The plan defines the strategies to be employed to manage fire appropriately within the reserved lands. A far more coordinated system than existed in the past. The park plans are produced in conjunction with the District RFS staff and are integrated with the local RFS Risk Management Plan to which the community together with NPWS and other government agencies contribute. The plans are compiled utilising scientifically confirmed data including vegetation type, land form, and historical fire activity and frequency, thus allowing the determination of appropriate hazard reduction and wild fire strategies. The plan identifies Asset Protection Zones and Strategic Fire Management Zones which are areas prioritised for fuel reduction operations during safe periods to limit fuel available to larger and more dangerous fires during the fire season.

The local Fire Management Committee considers hazard reduction targets on an annual basis and these are generally based on the data held in the two plans. Hazard reduction targets are generally set on a state basis and are mandatory. Hazard reduction generally includes a number of activities including fuel reduction burning but may also include mechanical fuel reduction as well as construction of fire breaks and other opportunity structures (e.g. water points, heli-pads). It also includes construction and maintenance of strategic fire trails.

In the past, hazard reduction targets have sometimes been hard to achieve. This has generally been as a result of adverse weather conditions and/or due to the fact that NPWS staff involved in fire management were often sidelined because they had to deal with numerous other land use responsibilities with often competing management priorities. This problem would now appear to be lessened now that cadres, within each region, have been appointed who are committed entirely to hazard reduction and fire control duties and cannot be used for any other purpose.

NPWS works closely with private landowners and though there is not necessarily an obligation, generally do provide assistance whether it is in the form of planning, preparation, access, support or joint operations. In the case of wildfire, NPWS frequently undertakes protection activities on private land at the request of the land holder or RFS, often despite the fact that the private landowner has not necessarily complied with their obligations under the Rural Fires Act.

• Weed and Vertebrate Pest Management.

The management of weed and vertebrate pests across NSW involves the input of a plethora of government authorities, each seemingly vying for a separate constituency with the consequence being only limited inter-communication and equally limited coordination and direction. These authorities include Livestock Health and Pest Authorities (LHPAs), local councils, weed county councils, wild dog boards as well as public land management authorities including the National Parks and Wildlife Service, NSW State Forests and Department of Lands and probably several others. Strangely, the only authority which is likely to have a more holistic view and thus the potential to coordinate effectively ,particularly at a catchment level, the Catchment Management Authority (CMA), has only a peripheral input generally in the form of occasional project funding. This lack of coordination results in waste and discord and is an understandable frustration to private landholders as it doubtless is to some of the land management agencies.

While notionally there is a legal requirement for both private landholders and public land management agencies to adhere to the same practices in regard to weed and vertebrate pest management, in practice this is rarely so because of the lack of sufficient resources (both government and non-government) but also more importantly an inability to pool resources and to coordinate controls across tenures. Unfortunately weeds and vertebrate pests do not respect boundaries and fence lines, thus unless we adopt a cooperative and coordinated approach across all tenures there is little real hope for effective control across the landscape.

This lack of cooperation and coordination is exemplified by the less than adequate treatment of the perennial weed known generally as Scotch Broom that has infested large areas of the Barrington Tops Plateau and which includes both public and private land. While in this case the National Parks and Wildlife Service has developed a containment strategy and expended many hundreds of thousands of dollars over the years to implement the strategy, adjacent land owners both government and non-government have done little, with the result that while contained in the park the weed is effectively unconstrained on adjacent private land and State Forest and is spreading northward without any chance of containment.

Weed and vertebrate pest management on newly acquired reserves (NPWS) can be a major concern if problems are not identified and dealt with early in the establishment stage. During the period that a reserve is initially acquired and subsequently gazetted some time can elapse before funding is provided and thus an apparent lack of response can be an irritant to adjacent landholders particularly if they are actively attending to their own pest and weed management problems. This is particularly the case where new reserves that were previously used for marginal agriculture have been established. In many cases the vendor ceases effective weed and pest control activities some time before or soon after an agreement to purchase has been made. In the case of delayed vacant possession this can extend the delay in active management even further, thus causing additional unnecessary neighbour frustration.

This is not to say that there is no cooperation between agencies and private owners and where it happens, good results generally follow despite the system. The advantages to be obtained from a well coordinated and properly funded pest control program undertaken jointly by managers of public lands and private landholders is clearly illustrated in the case of feral pig control in the catchment of the Upper Hunter. Both the National Parks and Wildlife Service and NSW State forests recognised that there was a major feral pig problem across tenures on the Barrington Tops Plateau. However, despite a long term (20 years) and expensive ongoing commitment to pig trapping, populations apparently moving into the park was increasing. The trapping program which was very labour intensive was successful in removing between 180 – 250 adult pigs per year but was not sufficient to really dent the population. Pig numbers were also known to be high in adjacent State Forest and surrounding grazing properties "Glenrock" and "Barry" Stations where feral pig control was limited to ad hoc hunting (shooting and pig dogging) both legal and illegal which was largely ineffective in controlling the population.

In one of those uncommon displays of cooperation the Armidale LHPA and NPWS in conjunction NSW State Forests and the managers of "Barry" and "Glenrock" stations jointly developed an aerial (helicopter) pig shooting program operating from the northern edge of Barrington Tops National Park throughout the two stations and into the western end of Curracabundi National Park. Aerial shooting of feral pigs is particularly effective as it prevents the rapid dispersal that usually follows contact and allows the whole group to be killed without the problem of spooked escapees which is

the norm with ground shooting and particularly with dogs. The result over a two year period was in excess of 1,000 pigs culled on each occasion. As a direct consequence of this program there was obviously a significant impact on the feral pig population then present on private property but of particular surprise was the negligibly small number of feral pigs subsequently moving into the park from outside, the numbers still present in the park being so small that conventional pig trapping almost became unviable.

Accordingly, it is the opinion of the Branch that public land managers have a real responsibility to improve their management of weeds and vertebrate pest species particularly on new lands and in doing this they need to seek a cooperative relationship with private landholders, however one that works both ways with mutual respect for each others views. In the same voice it is well past time that instead of fiddling around the edges, that government consider reforming the existing weed and vertebrate pest control system in NSW to provide unity, coordination and direction. The problem is **NOT** the establishment of conservation reserves per se, be they forest land, past marginal grazing land or wetlands, but rather the provision of adequate resources by government and the consequent development of a tenure blind approach to pest and weed management, state wide.

3. "Sustainable use" Models of Management.

The term "sustainable land use" or probably more appropriately multi-use land management is often raised as a solution to conflict between environmental and exploitative land use however there is rarely empirical evidence to indicate that there is no negative impact on biodiversity and consequent conservation values. Generally the economic priorities overwhelm the necessity to maintain conservation values resulting in a degraded model. When considering the management of conservation reserves (National Parks) the principal objective should be ecological sustainability and this is not always easy to achieve in multi-use with an exploitative model. It needs to be recognised that sustainability as a term is meaningless unless there is a method of defining it .In the case of multi-use models the objective must be compatible or the same. Economic sustainability, grazing sustainability and even biological sustainability are not synonymous with ecological sustainability hence potentially will conflict.

One instance of a multi-use model that has potential to be both ecologically and economically sustainable without causing undue impact on the conservation values of public land is nature based tourism, particularly in National Parks. Unlike other models of multi- use management there can be a nexus between nature conservation and tourism in that they both may tend to feed upon the other. Tourism is vital to the long term survival of the conservation estate as it is one of the factors that gives the estate a value that is clearly beneficial and evident to the public. Conversely any damage that tourism causes to the environmental values of the estate may impact upon the very values that the industry is seeking to exploit thus ecological sustainability is potentially a joint objective. This however is not necessarily a natural compatibility but one that needs to be very carefully managed and nurtured as if unfettered, adverse ecological impact resulting from tourism may in some cases potentially outweigh the benefits tourism is able to provide. Examples of damage to conservation values as a result of poorly managed tourism, particularly in the "old parks", are unfortunately numerous, fortunately however, it is generally not so severe that it cannot be remedied. Present management policies seek to rectify these past adverse impacts and actively limit potential future impacts. Examples of the consequences of unfettered tourism are well documented where tourism activity has inadvertently damaged significant natural values e.g. Royal National Park (Sydney), Morton National Park (Illawarra) and the Warrumbungles (Coonabarrabran). In these and other parks many of the icon areas have been "loved to death" with poorly constructed and informal facilities causing erosion, land slips and avoidable compaction with consequent habitat degradation and destruction. There are many icon sites where uncontrolled removal of firewood has resulted in long term damage to vegetation communities near popular camp sites and day use facilities. Another insidious impact of tourism if not managed carefully is that of the spread of Phytophthora and other vegetation destroying pathogens by walkers and as a result of vehicle use in contaminated areas. Accordingly while tourism can be considered to be a legitimate and generally benign partner, its sustainability cannot be taken for granted . Management needs to be careful and the scope of tourism restrained when there is potential for real ecological damage.

While not exactly sustainable multi-use there are a number of examples where multiuse principles have been applied by NPWS to achieve ecological objectives in the short term. In Oolambeyan National Park (Hay Plain) and Curracabundi National Park (Gloucester/Nowendoc) grazing of livestock including sheep and cattle has been used to manipulate conditions to facilitate Threatened Species conservation objectives. At Oolambeyan NP enclosed target areas were periodically stocked and grazed by sheep to create conditions suitable for the Plains Wanderer, a small threatened bird that requires a low grassy landscape for successful reproduction. Similarly at Curracabundi NP cattle were used to reduce the grassy biomass around historic farm buildings and yards to prevent damage in case of wildfire. These ad hoc programs though probably sustainable in the short term were neither particularly necessary on a long term basis nor particularly sustainable.

While such programs may provide quick conservation management alternatives the cost involved in ensuring sustainability will often be high and it is likely when analysed that the multi-use benefits will be slight and often one sided. The use of stock grazing as a management tool requires effective compartmentation and thus considerable expense on fencing, it necessitates stocking rates that are ecologically appropriate and sensitive to climatic conditions, and this may not necessarily be economic for a long term grazing exercise. Similarly the need to remove stock from conservation grazing areas according to climatic conditions and other conservation management prerogatives makes a less than an attractive proposition to many proponents. Though many proponents of multi–use management initially see benefit in such schemes, particularly neighbours who assume that they will be the first to benefit, this attitude changes when they are faced with a government tendering system which is transparent and objective and does not necessarily favour the local grazier. In both the parks cited considerable difficulties occurred due to the need to de-stock when and if ecological objectives had been achieved.

A more dubious example of sustainable multi-management which is frequently proffered is the so called sustainable logging that is taking place now in public forests of the North East of NSW. This activity results in large areas of public forest land being subjected to industrial scale logging which is essentially akin to clear felling e.g. Taree/Coopernook/Kendall Forest District) with consequent massive destruction and disruption to habitat with consequent severe loss of continuity and structure. As a consequence of the intensity of the initial logging together with silvicultural treatments subsequent regrowth is simplified resulting in permanent change to forest structure and species composition. The effective removal of the high conservation value mature class component and its eventual replacement by what is an essentially even aged monoculture, a young forest that in itself will be in turn subjected to a series of short logging rotations which will never permit replacement of the habitat values already destroyed.

While so called sustainable forest logging can result in high short term profits to industry it invariably leads to degraded native forests or plantations which will lack their past conservation values which are lost for good and can never be replaced certainly in normal lifetimes. There is even doubt as to whether this "sustainable forestry" will in the long run prove to be economically sustainable considering the parlous state of the finances of NSW State Forests and the legal status of present timber harvesting contracts.

The Branch therefore remains dubious about the effectiveness and sustainability of exploitative multi-use activities on public land and in particular in National Parks and consider that when subjected to appropriate analyses generally depreciate conservation values and fail to satisfy ecological sustainability objectives, their prime motivation being short term economic gain and not necessarily sustainability.

Conclusion.

In conclusion the Branch appreciates the opportunity given to it to make comment to the Inquiry and sincerely hopes that its comments will be considered and will be of benefit to the deliberations of the committee membership.

Yours faithfully.

Ian Hodson State Delegate. 22 September, 2012.