Submission No 260

INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN NEW SOUTH WALES

Organisation: NSW Farmers' Association

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SUBMISSION TO
GENERAL PURPOSE STANDING COMMITTEE NO.5

MANAGEMENT OF PUBLIC LAND IN NSW

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Recommendations

RECOMMENDATION 1

That proposed conversions of Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas include early engagement to ensure that neighbouring landholders and the community more broadly are not adversely affected, in the planning, transitional or operational phase of proposed conversions.

RECOMMENDATION 2

That a legislative requirement be introduced to require the publication of a Better Regulation Statement prior to the introduction of legislation that will transfer Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas.

RECOMMENDATION 3

That consideration be given to developing and adopting a standard methodology to estimate the triple bottom line costs and benefits of converting Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas.

RECOMMENDATION 4

That the level of hazard reduction in publicly managed lands be increased and that broadscale, burning regimes be expanded across the landscape to achieve reduced fuel loads and hence reduce the severity and spread of bushfires.

RECOMMENDATION 5

That all land managers support a tenure-blind, risk management approach to hazard reduction.

RECOMMENDATION 6

That sustainable grazing be investigated as a primary method of achieving bushfire hazard reduction in areas of the National Park estate.

RECOMMENDATION 7

That appropriate fire breaks and fire trails be established at and within the boundary of all publicly managed land to ensure private property is protected from bushfires emanating from National Parks, State Forests and other publicly managed land.

RECOMMENDATION 8

That public land managers actively participate in the Hotspots program.

RECOMMENDATION 9

That the NSW Government adopt a Weed Control Plan that delivers a tenure-blind, strategic approach to weed control across the landscape that includes the following:

- *A transparent and auditable process with coordination between all bodies involved;*

- *Increased funding for research and development into biological control agents for significant weeds;*
- *Increased funding for community awareness to impress the importance and necessity of responsible weed control;*
- *Disclosure of notifiable noxious weed status of property at point of sale;*
- *Effective cost recovery mechanisms to allow control authorities to administer weeds legislation on recalcitrant landholders on a user-pays basis, without disadvantaging ratepayers.*

RECOMMENDATION 10

That State and Federal Governments collaborate on a fully integrated and coordinated approach to controlling vertebrate pests across all tenures, including consideration of cross-border impediments to vertebrate pest animal control, to be resourced appropriately as an ongoing concern.

RECOMMENDATION 11

That a logistics driven program of weed and pest animal threat containment and eradication be developed and implemented, supported by modern information technology (such as GIS mapping underpinned by integrated, real-time database tracking)

RECOMMENDATION 12

That commercial harvesting of kangaroos in state forests – particularly state pine forests – be investigated and that eastern zones of NSW be opened up to commercial kangaroo harvesting.

RECOMMENDATION 13

That the Travelling Stock Reserve system be maintained.

RECOMMENDATION 14

That Livestock Health and Pest Authorities (LHPAs) pay their share of fencing repairs and capital improvements for Travelling Stock Reserves and Routes damaged by LHPA activities.

RECOMMENDATION 15

That consideration be given to the range of activities permitted to be undertaken in National Parks and State Forests, with a view to allowing controlled grazing and selective logging in some areas.

RECOMMENDATION 16

That the NSW Government work closely with NSW Farmers at a state and local level to develop safety and access protocols in relation to shooting in National Parks.

RECOMMENDATION 17

That the NSW Government instruct NPWS to amend its Bee Keeping Policy to identify and make new hive sites available to apiarists within National Parks.

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1. Introduction

NSW Farmers appreciates the opportunity to respond to the *Inquiry into the Management of Public Land in NSW* being conducted by General Purpose Standing Committee No 5.

NSW Farmers is Australia's largest state farming body, representing the majority of commercial farm businesses in NSW, ranging from broadacre, meat, dairy, wool and grain producers, to more specialised producers in the horticulture, egg, pork, oyster and goat industries. Responsible management of our land and water resources is fundamental to the success of these farm businesses, and the families who own and operate them.

There are more than 43 500 farm businesses in NSW contributing more than $8.3 billion to the NSW economy per annum, representing some 3.4% of the NSW economy.[1][2] Given that every dollar from on-farm production has a multiplier earning effect across agribusiness pre- and post-farm gate of 1:5, the true value of agriculture to the state is even higher.[3]

As custodians of approximately 72% of the land mass of NSW, farmers take their role as land managers seriously.[4] This requires active management of the landscape, recognising that farmers exist in a dynamic operating environment, often adjacent to publicly managed land. This active management is fundamental to addressing the massive weed and pest animal challenge facing landholders right across the country, especially in NSW. Agricultural businesses in NSW already invest more than 3 million person days per year managing their weed, pest, land and soil problems.[5] There is a very real and legitimate concern that 'locking up' parcels of land for the purposes of National Park estates or other types of conservation areas could lead to weed and pest animal incursions that could affect not only the conservation area, but also the lands adjacent.

Demand for food is set to increase by 70% by 2050 as the global population rises to around 9.1 billion people.[6] Already, the Asia-Pacific region is home to nearly two thirds of the world's hungry people.[7] This makes farmers in NSW well placed to improve the livelihoods of some of our closest neighbours by investing in new infrastructure and technology to produce more food and fibre from the same amount of land, assuming land use conflict does not see even more productive agricultural land lost to competing interests.

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[1] Australian Bureau of Statistics (2011) *Agricultural commodities, National and State 2010-11*, Cat no. 7121.0
[2] NSW Parliamentary Library Research Service (2012) *Agriculture in NSW (July 2012) Statistical Indicators 4/12* p.i
[3] Australian Bankers Association, 2011, *Proposed Plan for Murray Darling Basin submission*
[4] Australian Bureau of Statistics (2011) *Agricultural commodities, National and State 2010-11*, Cat no. 7121.0
[5] Australian Bureau of Statistics (2008) *Natural Resource Management on Australian Farms*
[6] United Nations (2009) *How to Feed the World in 2050*
http://www.fao.org/fileadmin/templates/wsfs/docs/expert_paper/How_to_Feed_the_World_in_2050.pdf
[7] Food and Agriculture Organisation of the United Nations (2010) *Global Hunger Declining, But Still Unacceptably High*
http://www.fao.org/docrep/012/al390e/al390e00.pdf

The average Australian farmer grows enough food to feed 600 people every year, 450 of whom live outside Australia.[8] Australian farmers produce approximately 93 per cent of Australia's daily domestic food supply, and export 60 per cent (in volume) of total agricultural production.[9] Effective public land management regimes must ensure that surrounding farmers can continue to contribute strongly to the global food security challenge.

It is vitally important that the conversion of Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas not exacerbate an already significant challenge across all tenures in managing weeds and pest animals and minimising bushfire risk.

Landholders are already actively involved in natural resource management activities on a daily basis, with agricultural businesses in NSW spending the most overall on weed, pest and land and soil activities nationally[10]. As such, it is vitally important that any measures to change the tenure of a parcel of land do not adversely affect the weed, pest and land and soil activities being conducted on adjacent land. Unfortunately, this has not always been the case for past conversions of Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas, as outlined further in this submission.

2. Conversion to National Park Estate

2.1 Process of Conversion

The process of converting Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas has been highly variable since the first protected area was declared in 1866[11]. Whilst early conversions have been driven by a range of motives and involved varying levels of community engagement, conversions in the past decade have been typified by political expediency and poor community engagement.

For example, it is widely acknowledged that

> *"In 1995 the Carr Labor Government was elected on a nature conservation policy committed to the significant expansion of the terrestrial reserve system and the establishment of a system of marine parks. In the period from 1995 to [July 2010], 472 reserves, totalling 2.7 million hectares, have been added to the reserve system".*[12]

Whilst not wishing to downplay the importance of areas of state and national significance, the rapid pace with which these conversions took place meant that some communities felt disengaged from the process, perceiving that conversions in some

[8] Australian Farm Institute (2009) *Australia's Response to World Food Security Concerns* http://www.nff.org.au/get/2107.pdf
[9] Prime Minister's Science, Engineering and Innovation Council (2010) *Australia and Food Security in a Changing World* http://www.innovation.gov.au/Science/PMSEIC/Documents/AustraliaandFoodSecurityinaChangingWorld.pdf
[10] Australian Bureau of Statistics (2008) *Natural Resource Management on Australian Farms*
[11] NSW Parliamentary Library Research Service (2010) *NSW National Parks and Reserves*, p. 1
[12] NSW Parliamentary Library Research Service (2010) *NSW National Parks and Reserves*, p. 3

instances were dictated by political agendas rather than local community input, as explained further in Case Study 1 below. It should be noted that the 472 reserves declared in this 15 year period represent approximately 55% of the total number of areas protected in the last 146 years.

NSW Farmers would strongly support any moves to better involve the local community and all affected landholders in discussions about proposed conversions to National Park estate or other types of conservation areas from the outset, rather than after a decision has been made from on high. It must be recognised that this will involve the introduction of innovative and effective community engagement strategies to ensure authorities listen and respond to the community. It is important to note that farmers across the state are currently being asked to respond to a range of natural resource management reforms, including (but not limited to) the draft Strategic Regional Land Use Policy, the Native Vegetation Regulation review, a review of the *Environmental Planning and Assessment Act 1979* (NSW), draft wind farm planning guidelines, the Proposed Murray Darling Basin Plan, a review of water storages, the development of the National Wildlife Corridors Plan, and the Clean Energy Future legislative package. Consequently, farmers – and rural communities more broadly – are experiencing an overwhelming sense of reform fatigue, which highlights the need for the NSW Government to think carefully about the best ways in which to genuinely engage the community in the implementation of conversions already committed, as well as any future conversions.

> ***RECOMMENDATION 1***
> *That proposed conversions of Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas include early engagement to ensure that neighbouring landholders and the community more broadly are not adversely affected, in the planning, transitional or operational phase of proposed conversions.*

2.2 Impact Assessment

Members across the state remain unconvinced about the often over-stated social and economic benefits of converting productive agricultural land into National Park estate or other types of conservation areas, given the projected benefits often fail to be realised. As a recent example, the Draft National Wildlife Corridors Plan states that benefits "can include rural and regional employment opportunities in natural resource management and tourism"[13]. Given that there is no reference or supporting material to substantiate this claim, it is not possible to consider the social and economic data that has presumably contributed to this assertion. Whilst there may well be benefits, it must be recognised that the social and economic benefits of preserving tracts of land for biodiversity purposes have been overstated in the past, which can create scepticism within the local community.

[13] Department of Sustainability, Environment, Water, Population and Communities (2012) *Draft National Wildlife Corridors Plan* p. 14

Case Study 1: Riverina Red Gum Reservations

The passage of the *National Park Estate (Riverina Red Gum Reservations) Bill 2010 (No 2)* provides an example of poor process driven by real or perceived political agendas. The Bill – designed to transfer State forest land in the Riverina to National Park estate – was introduced 19 May 2010, passed by the Legislative Assembly that day, passed by the following morning and assented 24 May 2010. The bulk of the Bill provided for the land transfers necessary to establish the new reserves, creating more than 100 000 hectares of new protected areas comprised of 65 922ha of national park, 15 259ha of regional park and 20 684ha of Indigenous protected area. The Bill also provided for the revocation of some State forests and for them to be vested in the Crown as Crown land.

Two of the key findings of the 2009 Natural Resources Commission assessment that was a driver for the conversion emphasised the need for 'active management' of river red gum forests. The first reading speech refers to "the need for active and adaptive management, including a large-scale trial of ecological thinning". However, it was unclear at the time – and remains so – how the NSW Government will interpret 'active' and 'adaptive' management, and how these management techniques will be implemented, particularly noting recent restructures within the Office of Environment and Heritage. Nor is it clear what management regimes have been or will be put in place by the NSW Government to managing bushfire risk noting the significant fire events that took place in the region in 2002, 2006 and 2009.

The Bill was poorly timed from a community perspective, with farmers in the area reporting that they felt 'overwhelmed' by natural resource management reforms, noting that the region represented (and remains) the epicentre of the Murray Darling Basin Plan debate. Given the unacceptably short timeframes associated with the Bill, members reported that they were not consulted on the proposed future direction of the National Park Estate, nor how they would, or could, be affected. Members were particularly concerned about access to stock watering points, noting that 125-150 individual Western Lands leases were expected to be affected by the legislation based on boundaries within 50m of Riverina Red Gum communities. It should also be noted that at the time, the Livestock Health and Pest Authority districts within the bounds of the proposed estate were either 'in drought' or 'marginal'.

Two years after the Bill was assented, some members are no clearer as to how they will be affected by the conversion. Members are reporting that they remain unclear about the different types of reserves; how these reserves will be managed; and what the implications for stock access are, noting that some overlap Western Lands leases.

The process of conversion and assessment of impacts associated with this legislation were, in the view of NSW Famers, entirely inadequate. It should be noted that this process was replicated for the National Park Estate (South-Western Cypress Reservations) Bill 2010 in November 2010. This case study serves to highlight that decisions to convert Crown Land, State Forests and agricultural land into National Park estate and other types of conservation areas must be made *with* the community rather than *on behalf of* the community, and that time should be invested in engaging potentially affected landholders and the broader community, including a full assessment of potential impacts.

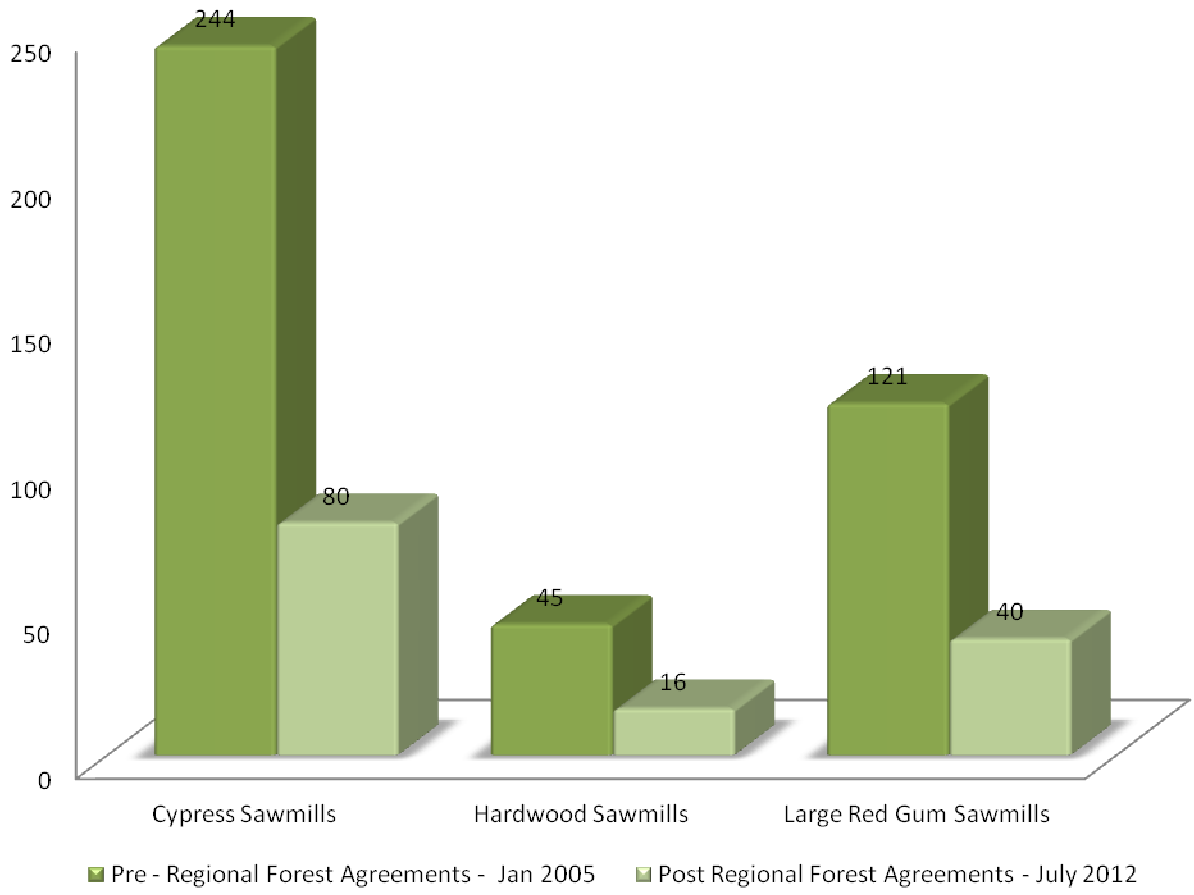
For example, the conversion of Toorale Station near Bourke to National Park estate in 2010 was projected to attract 10 000 visitors annually to the region, but visitor numbers were less than a fifth of that projected in the first year[14]. It should be noted that when operating as a successful floodplain grazing property, Toorale Station provided 10% of Bourke's business and 4% of the shire rates[15]. Similarly, only 8000 of the projected 50000 annual visitors were recorded at Yanga National Park near Balranald, formerly Yanga Station, in 2010[16]. Members remain strongly committed to the former Toorale Station being returned to a productive agricultural enterprise, recognising its potential to demonstrate world's best practice farming techniques and grazing management, delivering carbon, water and biodiversity stewardship outcomes, whilst achieving sustainable food and fibre production and the socio-economic benefits it brings to the local community and beyond.

The impacts of proposed conversions to National Park estate or other types of conservation areas should have been identified upfront before laws affecting these changes were introduced to Parliament. As an example, we understand that Better Regulation Statements, normally published ahead of major legislative changes, were not prepared in relation to the *National Park Estate (Riverina Red Gum Reservations) Act 2010*, or the *National Park Estate (South-Western Cypress Reservations) Act 2010*. NSW Farmers considers it inappropriate for such significant decisions to be taken without an independent assessment of the social and economic impacts. To ensure communities have access to important socio-economic information affecting their region, NSW recommends that a legislative requirement be introduced to *require* the publication of a Better Regulation Statement prior to the introduction of legislation which will transfer land to the National Park estate or other types of conservation areas.

Such analysis may have identified the employment implications of reducing forestry activities across the western region of Forests NSW. An analysis of publicly available forestry data indicates that the number of sawmills across the western region was reduced from 26 in January 2005 (ie pre- Regional Forest Agreement) to the current figure of nine. The resultant impact on employment was severe, with only 35% of the original number of staff now directly employed in the industry in the western region. Direct employment in the region dropped from 462 in January 2005 to the current figure of 164. Whilst the percentage drop in employment was roughly equivalent across cypress, hardwood and large red gum sawmills, the actual numbers of employees lost was highest for cypress sawmills, where 164 jobs were lost (see Figure 1 below).

[14] The Land (18 October 2010) *National Parks Flop* http://theland.farmonline.com.au/news/state/ agribusiness-and-general/general/national-parks-flop/2326089.aspx?storypage=0
[15] Sydney Morning Herald (2011) *Station buyout a 'waste of money'* http://www.smh.com.au/environment/station-buyout-a-waste-of-money-20111223-1p8ln.html
[16] The Land (18 October 2010) *National Parks Flop* http://theland.farmonline.com.au/news/state/ agribusiness-and-general/general/national-parks-flop/2326089.aspx?storypage=0

Figure 1: Direct Forestry Employment Pre-and Post-Regional Forest Agreements Old Riverina and Western Region



RECOMMENDATION 2

That a legislative requirement be introduced to require the publication of a Better Regulation Statement prior to the introduction of legislation that will transfer Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas.

2.3 The Economics of Establishing National Parks

One of the fundamental difficulties in assessing the value of establishing national parks is the difficulty in determining the potential benefits. Numerous studies have been conducted considering different modelling processes to estimate potential benefits including contingent valuation and travel cost methods. Each of them in themselves is contingent on the public perceptions and social values together with more determinable values of estimated popularity and expenditure.

In contrast, the costs of establishing national parks are a little easier to quantify. The different types of conservation cost include:

- Acquisition costs - including costs of acquiring property rights to a parcel of land;

- Management costs - those associated with management of a conservation program, such as those associated with establishing and maintaining a network of protected areas;
- Transaction costs - those associated with negotiating an economic exchange;
- Damage costs - those associated with damages to economic activities arising from conservation programs; for example, damages to crops and livestock from wild animals living in protected areas adjacent to human settlements can result in significant losses in income; and
- Opportunity costs - costs of foregone opportunities; that is, they are a measure of what could have been gained via the next-best use of a resource had it not been put to the current use[17].

> ***RECOMMENDATION 3***
> *That consideration be given to developing and adopting a standard methodology to estimate the triple bottom line costs and benefits of converting Crown Land, State Forests and agricultural land into National Park estate or other types of conservation areas.*

3. Public Land Management Practices and Requirements

As stated above, NSW Farmers remains concerned that 'locking up' parcels of land for the purposes of National Park estates or other types of conservation areas can lead to weed and pest animal incursions and increased bushfire risk that affects not only the conservation area, but also the lands adjacent. NSW Farmers is supportive of productive agricultural land being retained for that purpose into the future, and would therefore not be supportive of future purchases of productive agricultural land for the purpose of conversion to National Park estate. NSW Farmers would prefer to see funds budgeted for future private land purchase redirected towards weed and pest animal control in existing national parks.

3.1 Bushfire Risk Management

Publicly managed lands are often the source and usually provide the bulk of the fuel load in bushfires. It is important in the establishment and ongoing management of public lands that due consideration be given to the potential bushfire risks, control and hazard reduction.

In NSW, hazard reduction remains a contentious issue for NSW Farmers members, particularly with respect to publicly managed land. Under the *Rural Fires Act 1997*, land managers and owners are responsible for conducting hazard reduction to protect existing dwellings, major buildings or other assets susceptible to fire. Hazard reduction works provide areas of reduced fuel that can significantly reduce fire behaviour and aid

[17] Naido, Balmford et. al., *Integrating economic costs into conservation planning*, TRENDS in Ecology and Evolution Vol. 21 No. 12

fire suppression activities. Members are concerned that insufficient hazard reduction activities are being conducted on public land such as national parks.

> ***RECOMMENDATION 4***
> *That the level of hazard reduction in publicly managed lands be increased and that broadscale, burning regimes be expanded across the landscape to achieve reduced fuel loads and hence reduce the severity and spread of bushfires.*

NSW Farmers believes there is still much that can be done to prevent the inappropriate outbreak of bushfires across rural NSW through careful planning and sound policy. Ensuring appropriate hazard reduction activity across all land tenures remains an absolute priority.

> ***RECOMMENDATION 5***
> *That all land managers support a tenure-blind, risk management approach to hazard reduction.*

The preparation of Bush Fire Risk Management Plans will assist in delivering more positive hazard reduction outcomes at a local and regional level in NSW. The purpose of these plans is to protect life, economic assets (such as buildings, stock, crops and forests), and natural and cultural heritage. The Plans identify the risk rating and management strategies for each area.

NSW Farmers encourages the investigation of the use of sustainable grazing as a primary method of hazard reduction, including within areas of the National Park estate. Sustainable grazing could serve a number of purposes including the reduction of fire hazards, supporting local producers with additional access to feed for their livestock, and reducing the cost and risk of prescribed burning.

> ***RECOMMENDATION 6***
> *That sustainable grazing be investigated as a primary method of achieving bushfire hazard reduction in areas of the National Park estate.*

The interface between public land and private land is a critical factor in the management and control of fires. Under current native vegetation legislation, there are exemptions to allow for clearing around farm infrastructure, including fencelines, for the purposes of bushfire mitigation. Given the propensity for fires to originate in public lands and spread on to private lands, leading to economic loss of stock or crops, it should be a requirement of public land managers to ensure suitable buffer zones are created. Under Section 100 of the *Rural Fires Act 1997*, it is an offence for a person who owns or occupies land to permit a fire to escape from that land under such circumstances as to cause injury or damage to the neighbouring land. The same basic principles should apply to public land managers.

RECOMMENDATION 7

That appropriate fire breaks and fire trails be established at and within the boundary of all publicly managed land to ensure private property is protected from bushfires emanating from National Parks, State Forests and other publicly managed land.

Much of the Australia's native flora relies on bushfires as part of its reproductive cycle. Most eucalypt ecosystems depend on frequent low intensity fire to maintain natural nutrient cycles and the balance between established trees and their competitors and arbivores. In recognition of this, the Nature Conservation Council, together with a number of organisations including NSW Farmers and the Rural Fire Service, initiated the *Hotspots* program, which provides landholders and land managers with the skills and knowledge to actively participate in fire management for the protection of life and property, while at the same time ensuring healthy productive landscapes in which biodiversity is protected and maintained. It is important that public land managers also participate in this process.

RECOMMENDATION 8

That public land managers actively participate in the Hotspots program.

3.2 Weed Management

Weeds present a massive and increasing cost to agriculture and the natural environment, costing NSW more than $1.2 billion in lost production and associated costs every year[18]. A massive 20% of the flora of all regions of the state are weeds, with 190 of the approximately 1400 weed species across NSW listed under the *Noxious Weeds Act 1993*[19]. The most recent Australian Bureau of Statistics survey of natural resource management on Australian farms[20] found that 90.9% of surveyed NSW agricultural businesses reported weed related activities, spending $475 million per year (collectively) on weed control activities. This equates to approximately $11 000 per agricultural business per annum – more than farmers spend on pests and land and soil problems combined, and more than is spent on these activities by farmers than in any other state.

Weeds are not only enormously damaging to agriculture, but also damage the natural environment, waterways, coastal areas and urban areas and pose a significant threat to biodiversity, with 419 threatened species, populations and ecological communities in NSW threatened by weeds[21].

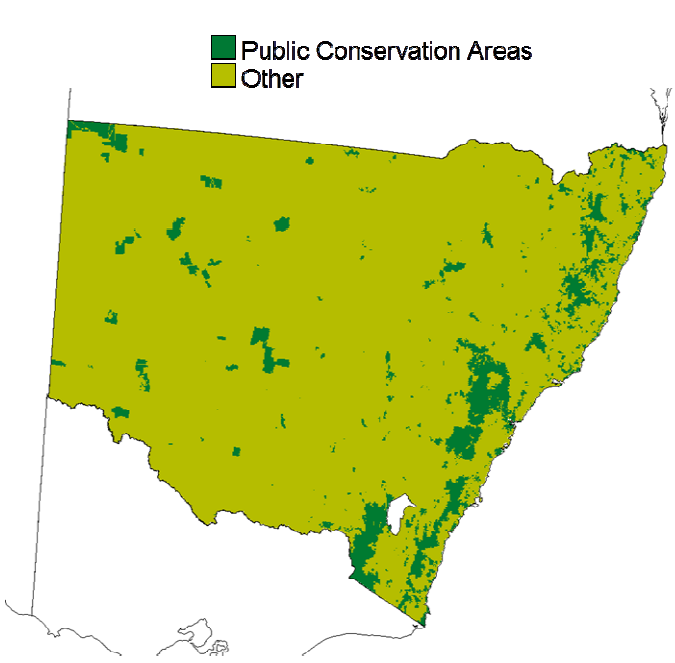
[18] NSW Parliamentary Library Research Service (2012) *Noxious Weeds Briefing Paper No 02/2012*
[19] ibid
[20] Australian Bureau of Statistics (2008) *Natural Resource Management on Australian Farms 2006-07*
[21] NSW Parliamentary Library Research Service (2012) *Noxious Weeds Briefing Paper No 02/2012*

While these economic and environmental costs are staggering, of more concern is that these costs can only increase, given anecdotal evidence that, in some areas, weeds are spreading faster than they can be controlled.

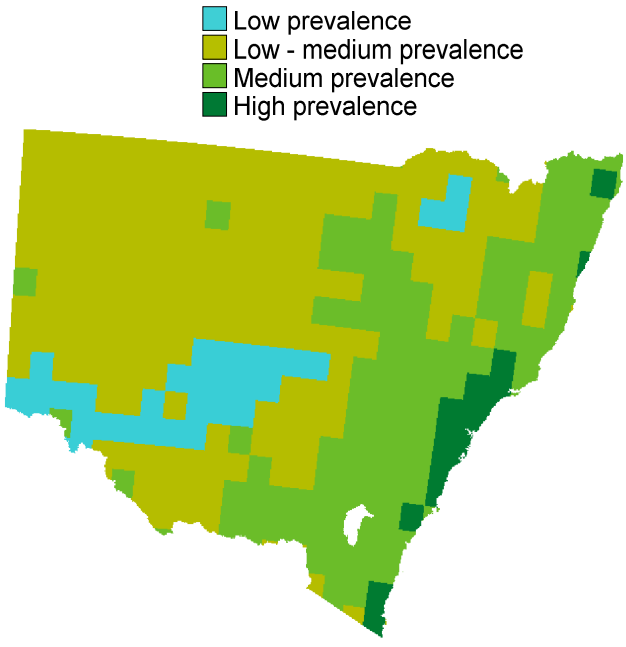
NSW Farmers argues that one of the most significant impediments to controlling the growing weed problem in NSW is the inconsistent approach to weed management across tenures. All land managers – be they public or private – must play a role in weed management. This includes roads and reserves. Figure 2 below highlights a degree of overlap between weed species presence (based on 20 common weed species captured in the ABARES Weeds Occurrence Survey) and public conservation areas, acknowledging that weeds are present across all tenures. A tenure-blind approach is essential.

NSW Farmers acknowledges that some improvements have been made via recent amendments to Noxious Weeds legislation in NSW. However, the amendments fell short of requiring equivalence across all tenures, with implementation costs cited as the reason. Whilst it is clearly costly to actively manage the landscape and undertake weed management activities across the National Park estate and other conservation areas, NSW Farmers argues it is a great deal more costly to fix the problem after it is out of control.

Figure 2: Public Conservation Areas Relative to Weed Species Presence



NSW Public Conservation Areas, ABARES 2005-06



Number of weed species present, ABARES 2009

Similarly, NSW Farmers submits that additional resources must be invested in weeds research, development and extension, including the investigation of biological control of weed species, in order to address the *current* weeds problem.

The current approach to noxious weed management on the Windamere Dam Foreshores is but one example of the failures of poorly planned and executed weed control on publicly managed land. Members in the region are reporting that the noxious weed incursion is increasing at an alarming rate, placing a costly burden on neighbouring properties. Members in the region have the added problem of wild dogs in the area with over 400 sheep lost over the last three years. Members fear that this situation has disastrous potential for woolgrowers in the wider district, as populations of wild dogs on this land is in striking distance of some of the region's renowned superfine wool growing country from Rylstone to Pyramul and beyond. The Foreshores is just one example of publicly managed land that seems to have a different set of rules when it comes to weeds and pest animals.

RECOMMENDATION 9

That the NSW Government adopt a Weed Control Plan that delivers a tenure-blind, strategic approach to weed control across the landscape that includes the following:

- *A transparent and auditable process with coordination between all bodies involved;*
- *Increased funding for research and development into biological control agents for significant weeds;*
- *Increased funding for community awareness to impress the importance and necessity of responsible weed control;*
- *Disclosure of notifiable noxious weed status of property at point of sale;*
- *Effective cost recovery mechanisms to allow control authorities to administer weeds legislation on recalcitrant landholders on a user-pays basis, without disadvantaging ratepayers.*

3.3 Pest Animal Management

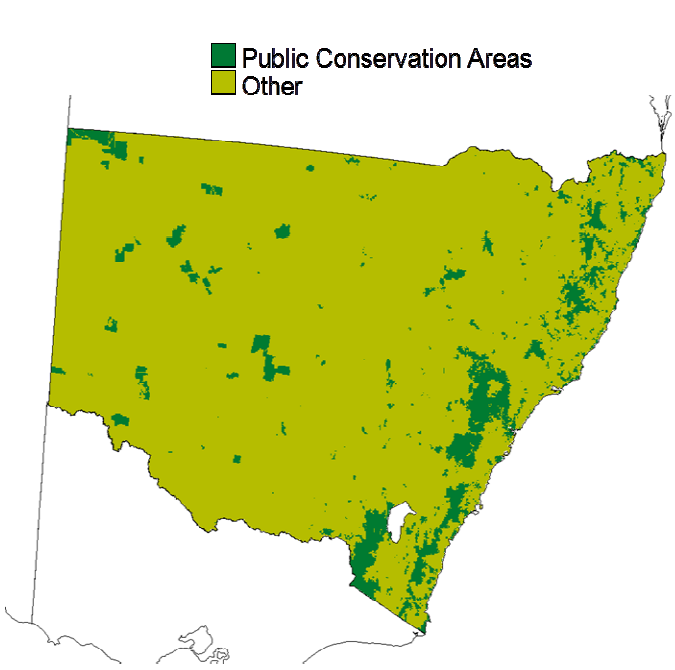
Pest animals have significant economic, environmental and social impacts, not only in NSW, but right across Australia. Whilst estimates vary depending on the pest animals included, and the scope and methodology of the study, "there appear to be no Australia-wide estimates of agricultural losses measured with the economist's concept of welfare and no national or statewide estimates of environmental loss based on the same concept"[22]. However, the Australian National Pest Animal Strategy cites a McLeod (2004) study of eleven of Australia's major pest animals as having "negative impacts in Australia value at over $720 million per annum"[23]. Given the increased pest animal presence across a number of species since this study was conducted, NSW Farmers estimates the current costs of pest animals to be significantly higher.

[22] Invasive Animals Cooperative Research Centre (2009) *The economic impacts of vertebrate pests in Australia* p. 1
[23] Natural Resource Management Ministerial Council Vertebrate Pests Committee (2007) *Australian Pest Animal Strategy – A national strategy for the management of vertebrate pest animals in Australia*

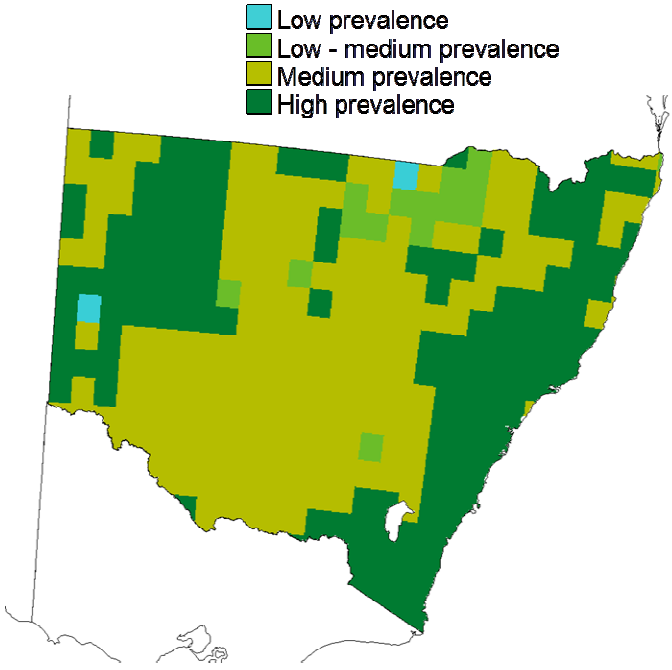
As is the case for bushfire and weed management (see above), there is a clear need for a tenure-blind approach to pest animal management. There is also a clear need to ensure a nationally consistent framework for vertebrate pest animal control, whilst allowing regionally appropriate management regimes as developed at the local level. Our members on the NSW/Victorian border in particular have stressed the need to remove cross-border impediments to facilitate more effective wild dog – and indeed all vertebrate pest – control.

Figure 3 below highlights a clear correlation between introduced pest species prevalence (for cats, deer, dogs, foxes, goats, horses, rabbits and starlings) and public conservation areas, with high prevalence across the majority of public conservation areas.

Figure 3: Public Conservation Areas Relative to Introduced Species Prevalence



NSW Public Conservation Areas, ABARES 2005-06



Number of introduced pest species present, ABARES 2006

The findings of the NSW Farmers wild dogs survey (see Case Study 2 below) highlight that wild dogs have been a problem in NSW for well over a decade, and show no sign of reducing in number. The results highlight a massive challenge – but also a significant opportunity – for the NSW Government and all key stakeholders involved in wild dog control to better coordinate effort and improve landholder engagement across all tenures.

RECOMMENDATION 10

That State and Federal Governments collaborate on a fully integrated and coordinated approach to controlling vertebrate pests across all tenures, including consideration of cross-border impediments to vertebrate pest animal control, to be resourced appropriately as an ongoing concern.

Case Study 2: Wild Dogs

Wild dogs cost Australian agriculture at least $66 million annually[24], without taking into account the significant disease spread costs attributed to wild dogs, nor the social costs of dog attacks. There are also costs to our wildlife, as in addition to preying on stock, wild dogs also prey on native animals. NSW Farmers conducted a member survey throughout January and February 2012 to determine how entrenched the wild dog problem is in NSW. More than 140 responses were received across the state.

- The overwhelming message from survey respondents was that not enough is being done to control wild dogs in NSW, with 88% of respondents saying not enough is being done; 11% saying that they were unsure and only 1% reporting that enough is being done. The challenge for all key stakeholders is more effectively communicating just what is being done on the ground to address what is clearly a significant wild dog problem in NSW.
- 54% of respondents reported that their properties are adjacent to publicly managed land. In the South East, 80% of recipients reported that their properties are adjacent to publicly managed land.
- On average between 2000 and 2012, 63% of respondents annually reported losses to their sheep flocks and 34% losses to their cattle herd.
- 91% of respondents to date have had dogs on their property before, 58% of which first noticed dogs on their property more than 10 years ago, indicating that the problem is well-established.
- 54% of respondents reported that they keep photos/diary records to document the problem, and to assist in reporting to authorities.
- 89% of respondents reported that wild dogs have had an impact on their stock (mostly sheep and cattle), with some reporting more than 100 stock lost in a single year.
- Baiting and aerial baiting (83%) is the most commonly reported control method, closely followed by trapping (66%) and other (50%) (eg shooting, relocating stock). 46% of respondents reported that they have made change in stock numbers/patterns as a control method.
- A massive 88% of respondents have noticed an increase in wild dog numbers in recent years. Respondents indicated that the main causes of recent increase were believed to be insufficient/ineffective control on public land (77%), insufficient resources (49%), baiting patterns (44%), lack of coordination (41%) and seasonal conditions (37%), highlighting a key area of opportunity for the State Government, LHPAs and all key stakeholders to work more collaboratively on wild dog prevention, eradication and management strategies.
- 85% of respondents indicated that they report sightings to the LHPA or Wild Dog Management Advisory Committee.
- 46% of respondents indicated that they are a member of a Wild Dog Management Advisory Committee.
- Only 54% of respondents indicated that there is a wild dog management plan for their area, with 28% reporting that they are unsure. This highlights another area of opportunity for all key stakeholders.

[24] Pest Animal Control Cooperative Research Centre *Wild Dogs in Australia http://www.feral.org.au/wp-content/uploads/2010/03/WildDog.pdf*

NSW Farmers would welcome consideration of the development of a spatial methodology to allow systematic, real-time, map-based call logging of pest animal sightings and outbreaks. This could also be applied to weeds mapping. NSW Farmers is concerned that there is currently limited – if any – integration of information, making it difficult for all levels of Government to gain a clear picture of the problem, the extent of management activities, and the ongoing costs across Government.

> ***RECOMMENDATION 11***
> *That a logistics driven program of weed and pest animal threat containment and eradication be developed and implemented, supported by modern information technology (such as GIS mapping underpinned by integrated, real-time database tracking)*

Still on vertebrate pests, NSW Farmers supports the commercial harvesting of kangaroos in state forests, particularly state pine forests. NSW Farmers believes that the haul area of forests should be added to the surrounding farm areas for the purpose of determining quotas. NSW Farmers is also seeking an extension of commercial harvesting zones to coastal areas of NSW. Much of Eastern NSW is covered by National Park estate and accordingly has a substantial kangaroo population which can lead to unsustainable numbers affecting nearby farmland. NSW Farmers members who live in these areas feel unfairly prejudiced by the current policy which restricts commercial harvesting on their land. NSW Farmers submits that there is no plausible environmental reason that commercial culling not be allowed in these areas and that, at a minimum, it should be extended further toward the coast in areas that are still predominantly agricultural.

> ***RECOMMENDATION 12***
> *That commercial harvesting of kangaroos in state forests – particularly state pine forests – be investigated and that eastern zones of NSW be opened up to commercial kangaroo harvesting.*

3.4 Travelling Stock Reserves

Travelling stock reserves (TSRs) play an important role in agricultural operations. This was clearly evident during the recent prolonged drought where livestock owners were able to travel and graze stock along TSRs, therefore sustaining them through drought.

In addition to the direct benefit to landholders who access TSRs for stock movement or grazing, TSRs also play an important role from a local biodiversity and public good perspective. Whilst TSRs provide a range of benefits, determinations in respect of their use must be made at the local level with the grazing or transporting of stock the primary reason for TSRs.

NSW Farmers understands that the NSW TSR system was to have been reviewed by the Livestock Health and Pest Authorities following the 2009 review, but it does not appear

that this review was conducted. However, the Land and Property Management Authority did conduct a pilot of its environmental and public benefit assessment process with a number of TSRs in the Hunter region through 2009 and 2010. It is understood that this process has allowed the Land and Property Authority to establish an assessment process to allow TSRs to be privatised if the TSRs were to be referred back to the Crown from the LHPAs. As TSRs involve an interactive relationship between the local landholders, NSW Farmers believes that while options for their closure and privatisation should be considered, the assessment of their continued existence should be made at the local level with direct landholder consultation.

In determining the role of TSRs and their place in the local landscape, potential revenue streams must be considered to ensure cost maintenance. NSW Farmers believes it is reasonable to charge livestock managers a commercial rate of agistment on Travelling Stock Reserves and other reserves, except when stock concerned come from properties that are drought declared or fire or flood affected.

RECOMMENDATION 13

That the Travelling Stock Reserve system be maintained.

The maintenance of TSRs should rest with the LHPAs who manage them. As those deriving benefits of TSRs are those that pay for their use, accordingly, LHPAs should bear the cost, which could in turn be passed on to those who use TSRs through the charge-out costs. Furthermore, damage associated with TSRs should be covered by LHPAs.

RECOMMENDATION 14

That Livestock Health and Pest Authorities (LHPAs) pay their share of fencing repairs and capital improvements for Travelling Stock Reserves and Routes damaged by LHPA activities.

3.5 Multiple-Use Regime

NSW Farmers believes that consideration should be given to the range of activities currently permitted to be undertaken in the National Park estate and State Forests, and whether there is scope – and local community support – for a multiple-use regime. NSW Farmers believes that there are a number of National Parks capable of supporting controlled grazing, beekeeping and selective logging (as an example), leading to improved biodiversity, bushfire management and economic outcomes.

Whilst NSW Farmers does not have formal policy on the recent decision to allow hunting in a select number of national parks, the priority for members is ensuring that safety and access issues are resolved well in advance of these activities commencing. NSW Farmers has commenced discussions with the Game Council of NSW to work through these issues.

RECOMMENDATION 15

That consideration be given to the range of activities permitted to be undertaken in National Parks and State Forests, with a view to allowing controlled grazing and selective logging in some areas.

RECOMMENDATION 16

That the NSW Government work closely with NSW Farmers at a state and local level to develop safety and access protocols in relation to shooting in National Parks.

3.6 Access for Managed Honeybee Hives in Public Reserves

The Australian honeybee industry has an estimated gross value of product of over $90 million dollars per annum, including honey, wax, paid pollination services and industry services.[25] In addition, paid pollination services are estimated to contribute $107 billion to the Australian economy annually.[26] Approximately one third of Australia's apiarists are based in NSW,[27] producing almost 45 percent of Australian honey.[28]

Access to native floral reserves has been identified as being an essential source to the licensed apiculture industry; contributing up to 70-80 percent of commercial honey production,[29] as well as providing the food resources required to ensuring hive strength.[30]

However, restrictive policies applied by the National Parks and Wildlife Service (NPWS) with regard to providing access to managed hives have constrained the capacity of the beekeeping industry in NSW.[31] The NSW Government submission to the House of Representatives Standing Committee on Agriculture, Fisheries and Forestry's inquiry into the future development of the Australian honey bee industry outlines that, under the policy it has adopted, '[f]uture assess to NSW National Parks [for managed hives] is limited'.[32] The submission outlines that this is on the basis of the honeybee being an 'exotic species' and the listing of feral honeybee populations as a 'key threatening process' under the *Threatened Species Conservation Act 1995.*[33] Under this policy, sites in National Parks and reserves managed by the NPWS '[n]o additional apiary sites will be approved'.[34] Continuity of beekeeping is to be retained where beekeeping has been undertaken by consent or permit on 'lands transferred to the' NPWS.[35]

[25] Honeybee RD&E Plan 2012-17, p 3.
[26] Ibid.
[27] Ibid.
[28] Diana Gibbs and Ian Muirhead 'The economic value and environmental impact of the Australian beekeeping industry' 10.
[29] Diana Gibbs and Ian Muirhead 'The economic value and environmental impact of the Australian beekeeping industry' 37.
[30] Ibid 40.
Ibid 41.
[31] National Parks and Wildlife Service 'Bee Keeping Policy'.
[32] NSW Government submission
[33] Ibid.
[34] National Parks and Wildlife Service 'Bee Keeping Policy', [17].
[35] Ibid.

Dr Doug Somerville, outlined in his paper 'NSW National Parks and Beekeeping', that in the initial implementation of this policy as many as 3,000 sites were lost to beekeepers within lands managed by the NPWS.[36]

NSW Farmers policy on the implementation of environmental regulation is that it should be evidence-based, with a triple bottom line objective. That is, there should be equal weighting to the social and economic outcomes of the regulation, as that afforded to the environmental outcome.

Further, at the NSW Farmers 2012 Annual Conference, members adopted the principle that in the consideration of an environmental objective, a net approach should be considered. The application of such a principle would require the implementers of policy to consider whether, in seeking to achieve one specified environmental outcome, secondary adverse outcomes are created, including the hindering of an environmental good.

Evidenced based

NSW Farmers is concerned that the evidence base utilised by NPWS in the establishment of its Beekeeping Policy and by the NSW Scientific Committee in its key threatening process determination, was not balanced due to a failure to consider counterbalancing literature available at the time. For example NSW Farmers refers to the writings of Rob Manning,[37] and Dean Paini.[38]

Likewise NSW Farmers is concerned that whilst the NPWS outlines that the listing of feral honeybees as a key threatening process will not 'affect the keeping of managed honeybees';[39] it has been cited by the NSW Government to justify its restrictive policy on access for managed hives. This extrapolation fails to make a policy judgment based on the differences between managed and wild hives.[40]

Triple bottom line

As outlined above, paid pollination services are a key driver of economic creation through the Australian horticulture and cropping industries. The impact of the present restrictive policy of the NPWS could have a wide ranging impact upon the economy, commencing at a reduction the economic flow through of this activity, through to 'loss of production through the whole industry' as a result of inability to maintain hives at the necessary health.[41] This risk is more so due to the present worldwide risks to both managed and wild honeybee hives from pest and disease.[42]

[36] Doug Somerville 'NSW National Parks and Beekeeping', *The Australasian Beekeeper* (1999) vol 100, no 10, 404-407.
[37] Eg Manning, R. (1997) The honey bee debate: a critique of scientific studies of honey bees Apis mellifera and their alleged impact on Australian wildlife. The Victorian Naturalist 114(1): 13-22.
[38] Eg Dean R. Paini, Matthew R. Williams J. Dale Roberts (2005) 'No short-term impact of honey bees on the reproductive success of an Australian native bee' *Apidologie* 36 (2005) 613–621
[39] National Parks and Wildlife Service 'Threatened Species Information Questions and Answers: Competition from Feral Honeybees as a Key Threatening Process – An Overview' available online < http://www.environment.nsw.gov.au/resources/pestsweeds/feralHoneybeesFactsheet.pdf>.
[40] Diana Gibbs and Ian Muirhead 'The economic value and environmental impact of the Australian beekeeping industry' 49-51.
[41] Diana Gibbs and Ian Muirhead 'The economic value and environmental impact of the Australian beekeeping industry' 41.
[42] Honeybee RD&E Plan 2012-17, p 16.

Further, a growing body of research points to the therapeutic characteristics of honey derived from *Leptospermum* blossom in the healing of wounds.[43] A Rural Industries Research and Development Council report into these therapeutic properties identified beneficial traits from honey derived from reserves within the Northern Rivers region of NSW. In considering how to develop this resource, the report highlights the need for improved access for apiarists to national parks, to harness areas in which honey with favourable traits have been identified, and to aid discovery of other therapeutic properties in honey derived from native Australian flora.

Net Environmental Benefit

Lastly, NSW Farmers is concerned that in the making of the present NSW Government policy on providing access for managed hives to National Parks, a failure to consider net environmental effects has occurred. That is, by the thresholds presently placed upon the granting of access to National Parks, government has not properly considered the synergy between the agricultural production of honey and 'ecosystem service management'.[44] This includes the pollination of native flora.

RECOMMENDATION 17

That the NSW Government instruct NPWS to amend its Bee Keeping Policy to identify and make new hive sites available to apiarists within National Parks.

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[43] Dee A. Carter, Shona E. Blair, Julie Irish (2010) An Investigation into the Therapeutic Properties of Honey.
[44] Sarina Macfadyen et al (2012) 'Managing ecosystem services and biodiversity conservation in agricultural landscapes: are the solutions the same? *Journal of applied ecology* v 49, 691.