



Institute of Foresters of Australia
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Ms Naomi Stephens
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National Parks and Wildlife Service
PO Box 1967
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Re: Ecological Thinning Trial in New South Wales and Victorian River Red Gum Forests
Reference EPBC 2013/6713 (draft 23.01.2014)

Dear Naomi,

I refer to your invitation to the Institute of Foresters of Australia (IFA) of 4 March received 11th March 2014 to provide comments on the trial documented in the report "Ecological Thinning Trial in New South Wales and Victorian River Red Gum Forests Reference EPBC 2013/6713 (draft 23.01.2014).

I note that the closing date for public comment was 27 March 2014. One of our NSW committee members Mr Ron Wilson has spoken to Mr Mick O'Flynn regarding submission of a late response with the advice that a response provided this week may be taken into consideration. A response any later will be too late.

The IFA is a key stakeholder in forest management and scientific research relating to Australian forests and many IFA members have worked as Foresters in the River Red Gum Forests. It is unfortunate that the IFA was not in a position to make a response by the due date so I am providing a very brief set of comments which we would be only too pleased to provide additional detail and commentary at a later date. The IFA has made detailed public submissions about the management of River Red Gum forests on a number of occasions including to the original NRC assessment for the Red Gum Forests in 2009 and to the NSW General Purpose Standing Committee Number 5 review of the NSW public forests in 2012. Copies of those submissions which include proposals for thinning of Red Gum Forests can be made available on request.

I note from the draft document which describes the intended methodology of the trial that two levels of stem retention as well as a no thinning control will be used. Any felled timber in excess of 45-50 t/ha⁻¹ will be removed to a site where it is stockpiled for public collection purposes.

The IFA position is that we strongly support thinning of River Red Gum Forests to promote health of the thinned forest and therefore wish to see the trial proceed. However, we believe that the methodology could be varied to address concerns held by the IFA.

One key concern with the design of the trial is that the retention of woody debris seems to be fixed at 45-50 t/ha⁻¹. Fire is a major hazard to River Red Gum Forests and relatively high levels of woody debris will become a fire hazard. The IFA also has research evidence that the level of woody debris does not need to be high for biodiversity or general ecological health of the forest. A recent article (<http://dx.doi.org/10.1016/j.foreco.2011.03.012>) from 2011 is; "Benchmarks of fallen timber and man's role in nature: Some evidence from eucalypt woodlands in southeastern Australia" is presented in this paper by Vic Jurskis.

The IFA suggestion is that a thinning option is included where only a minimal amount of woody debris is left following the felling process, instead of the 45-50 t/ha⁻¹ level. The IFA is also concerned that the proposal to leave 45-50 t/ha⁻¹ of fuel onto the ground in a forest situation where natural fuel loadings are very much less than that volume would be a breach of the Rural Fires Act. We suggest this proposal to supplement the forests coarse woody debris should be reviewed by the relevant Bush Fire Management Committee.

Another concern is that the timber produced from the trial will be taken to a holding site and stockpiled for public collection purposes. The IFA believes that in the longer term ecological thinning will become a routine practice in the River Red Gum Forest to maintain forest health. When the River Red Gum Forests were transferred from State Forest to National Park or other reserve status there was a considerable social upheaval in the affected communities due to closure of sawmills and harvest and haul contractors. The main issue was loss of permanent employment. Prior to the transfer of forest to reserves, markets had been developed for a range of log types including firewood which was sold to Melbourne and Canberra as well as local markets.

The IFA believes that the timber being removed for ecological thinning should be used commercially so that some employment in the sale and distribution of such timber occurs in the relevant areas. The OEH should also retain a portion of the sale proceeds to offset the trial costs involved. During this trial there may be an opportunity to explore the sale of timber rather than stockpile it for public collection purposes.

There are additional suggestions which have been made in other IFA submissions but which time does not permit inclusion in this comment.

I request that consideration is given to the two points made above and that relevant IFA members will be pleased to communicate further during the process for developing ecological thinning protocols.

Yours sincerely

Ross Peacock
NSW Chairperson



DOC14/25390

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Dear Sir/Madam

I am writing to inform you about an opportunity to provide feedback on an ecological thinning trial planned for the River Red Gum forests in Victoria and New South Wales. The aim of the trial is to determine whether ecological thinning has a positive effect on the ecological health of the river red gum forests.

In January 2013 the ecological thinning trial was referred to the Federal Minister for the Environment under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*. The Minister decided that the trial be assessed for significant impacts on the environment.

The Commonwealth Government has directed that a Public Environment Report (PER) be prepared and released for community information and feedback. The PER provides information on the design of the trial, and the measures to reduce risks. Community members are invited to provide their feedback on plans for conducting the trial.

Viewing the Public Environment Report and Providing Comments

The Public Environment Report can be viewed on

<http://www.environment.nsw.gov.au/newparks/riverredgums/rrgresearch.htm>

Copies of the Report may also be viewed at the:

- Office of Environment and Heritage, Level 14, 59 Goulburn Street Sydney NSW 2000.
- Department of Environment and Primary Industries, 8 Nicholson Street East Melbourne 3002.
- Campaspe Regional Library (Echuca Branch), 310 Hare Street Echuca Victoria 3564.
- Department of the Environment, Canberra. Please email the Department at EPBC.Referrals@environment.gov.au to arrange a copy to be available for viewing at the Department

Public comment is invited until 27 March 2014. Responses can be provided by email to thinning.trial@environment.nsw.gov.au or by post to the PER Planner, PO Box 1049 Griffith NSW 2680.

The Victorian Department of Environment and Primary Industries and the NSW Office of the Environment and Heritage are joint proponents of the project. All submissions received will be reviewed by the joint proponents.

The Federal Minister will consider feedback from the submissions when considering whether to permit the trial under the EPBC Act.

I hope you will take the opportunity to provide feedback on this important trial.

Yours sincerely



4/2/14

Naomi Stephens
A/Director Park Conservation and Heritage
National Parks and Wildlife Service