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Local Land Services

Submission to the Local Land Services North Coast Natural Resource Management Plan

Introduction

The Clarence Environment Centre (CEC) is a volunteer organisation with a 32-year record of environmental advocacy in the Clarence Valley, having maintained an office presence in Grafton/South Grafton for that entire period.

Having been heavily involved in natural resource management (NRM) for the past 8 years, fulfilling weed eradication projects and contracts for a range of government agencies, including Local Land Services (LLS), the Centre is extremely interested in any NRM policies that are under consideration.

Discussion

Having read through the Plan, we are left somewhat disappointed. Given the climate change driven extremes we have encountered over the past 4 – 5 years, we were hoping to find a greater degree of forcefulness, for lack of a better term, in ensuring best practice NRM is occurs across all sectors. Instead, this plan, has the objective to: *“Promote the Landscape Restoration Flagship Program as the region’s overarching approach to delivering integrated landscape scale NRM programs,”* which merely tinkers at the edges of the problem.

Reading the Plan’s Foreword, confirms the complex framework under which the Plan is proposed to operate, *“aligning with the outcomes, priorities and timeframes of the North Coast Local Strategic Plan 2022-2026, the LLS NRM Framework 2021-2026, LLS Sustainable Agriculture Framework 2021-2026, and the Australian Government’s Regional Land Partnerships Phase 2 Program.”*

As a result, we believe there will be a relatively high degree of interest in the Plan from ‘tree-changers’, ‘life stylers’, ‘nature lovers’, and even some hobby farmers, mostly small property owners. This is something that has already been occurring through programs such as the LLS’s *“Protecting Priority Terrestrial Ecosystems”* program in the Pillar Valley area, and the Federal Government funded *“Upper Coldstream Biodiversity Project”*, both of which the CEC was involved in delivering the on-ground works.

However, we believe this level of complexity, with its conflicting aims and competing priorities, will severely hamper the delivery of NRM in areas where it really matters, i.e., across the broader farming community.

It appears that LLS already acknowledges this fact. For example, Objective 6 (“Healthy Resilient Landscapes”), which aims to: “*Establish an NRM Advisory Committee that brings stakeholders together*”, includes environment groups and Farmers Federation as delivery partners. However, farmers are conspicuously absent from Objective 7, which aims to “*Implement best practice on-ground threatened species recovery programs that contribute to landscape scale restoration in priority catchments*”.

This is a huge concern to the CEC because, as clearly displayed in the Plan’s Figure 3.3, (see right) showing the biodiversity corridors and biodiversity hotspots, some 75% of our home area, the Clarence Valley, is virtually excluded from any real attention under the plan. Of course, there is a significant amount of world heritage and national park estate involved, but still a huge area of privately owned land.

A case in point would be the local grazing industry, which covers much of that ‘blank’ area of the valley. Those grazing properties predominately occupy cleared river flats with surrounding forested country where periodic logging supplements the landowners’ incomes.

These properties cover thousands of square kilometres across the north coast, much of it containing crucial wildlife habitat, and providing movement corridors for fauna.

However, on the majority of those properties, over-burning to promote “green pick”, and to reduce “rubbish” (understorey vegetation), is routinely undertaken as an acceptable management tool. This practice is condoned by LLS, despite too-frequent fire being listed under the Biodiversity Conservation Act as a “Key threatening Process” to hundreds of threatened species and communities, not to mention biodiversity as a whole.

We draw attention to the one small area in the valley that is identified as a focus area for NRM (see green area on the above map, shown by the arrow), and described as the “Upper Coldstream biodiversity hotspot”.

We would also like to introduce a ‘plug’ for the Clarence Environment Centre, and its role in recommending the Upper Coldstream to the Nature Conservation Council of NSW (NCC) as an area of conservation significance which led to the federally funded 4-year Upper Coldstream Biodiversity Project. It was the subsequent work undertaken by our team that comprehensively documented the amazing diversity of the area.



The point we would also make, is that the Upper Coldstream is not the only hotspot, and the only reason why the rest of the valley is not similarly recognised is because nobody is looking, and right now those landowners are strongly opposed to any form of NRM. The exceptionally high biodiversity in other areas has recently been confirmed, again by the CEC team, while undertaking 2 multi-year regeneration projects in the Chambigne and Shannon Creek areas to the south-west of Grafton. That area's ecology has now been confirmed as equalling that of the Upper Coldstream.

A critique of the Plan

As already indicated, the CEC believes the conflicting doctrines under which the Plan has to operate will make successful NRM impossible without a complete change of direction, with legislative back-up, something no government appears to have the stomach for!

Another example is the consideration of: ***“On-farm soil health, native vegetation, & water quality”***, which is shown as a **priority** under the Plan (see right)

While it is great to see those considerations being acknowledged as a priority, we assert that across the vast majority of farmland, particularly that sector mentioned above, there is little interest in protecting any it. The LLS would be only too well aware of the conflict that can be generated by any mention of protecting native vegetation. This even went to the point where certain politicians considered the murder of an officer attempting to enforce land-clearing legislation, was understandable (Barnaby Joyce's response to the murder of Glen Turner).

We have read the Draft Plan to try to determine what actions are proposed to fix, or even improve, the identified problems with ***“On-farm soil health, native vegetation, and water quality”*** (dot point 7) and found specifics difficult to pinpoint.

We did learn that “customers” will see ***“Coordinated action”***, which consists of: *“Facilitating coordinated action that informs local, state, and national NRM initiatives and policy”*. However, curious to see what the national initiatives and policy was, we found that: *“The National Landcare Program underpins Australia's efforts in assisting best practice natural resource management. The National Landcare Program Phase Two has recently been announced with a number of funding opportunities available”*.

To find the Federal Government's NRM policy is underpinned by Landcare, an organisation largely dependent on part-time, albeit dedicated volunteers, was hardly encouraging.

However, it was gratifying to read the acknowledgement that: *“Natural resource management refers to the protection and improvement of environmental assets such as soils, water, vegetation and biodiversity”*, and also that, *“the Departments of the Environment and Energy, and Agriculture and Water Resources share responsibility for protecting and improving these natural resources through the delivery of the Australian Government's environment and sustainable agriculture programs”*.

PRIORITIES

- Threatened species and ecological communities
- World Heritage Areas
- Corridors and biodiversity hotspots
- Waterways and coastal environments
- Travelling Stock Reserves
- Land Management Framework
- On-farm soil health, native vegetation, water quality
- Natural disaster recovery
- Sustainability credentials

At least, it seems LLS has federal government backing to implement, even an obligation to deliver on this plan. If so, we believe the Plan should present a far more progressive stance in accepting that responsibility to “protect and improve” these environmental assets such as soils, water, vegetation and biodiversity, rather than only intervening on request, which appears to be the current policy.

Suggestions

Population Growth

The Draft Plan accurately sums up the current situation on page 3, whereby “*pressures on threatened species and ecological communities are continuing to rise; native vegetation is under increasing stress from increasing population growth, habitat fragmentation, invasive species threat, altered fire regimes, changing land use, overgrazing and climate change*”.

However, nowhere in the following 60 pages is there any mention of population growth, the major factor that has led to habitat fragmentation, the introduction of invasive species and changing land-use, not to mention increasing pollution and added pressure on water resources and waste disposal.

Population is a worldwide problem, not only for biodiversity and the natural world, that will have to be addressed, but that no one is prepared to face up to. We acknowledge that population growth is not a LLS responsibility, but the conversation must start somewhere, and the Plan has, at least, acknowledged the problem

Grazing

As well, there is no plan to reduce grazing pressures. In fact, despite having mentioned that the environment is under threat from overgrazing, there is not another single reference to the grazing pressures in the entire Plan.

Grazing is one of the greatest, if not the greatest, contributor to erosion and poor water quality; it is the greatest vector of invasive weeds; and is listed as a Key Threatening Process to hundreds of threatened species and ecological communities. Cattle trample and destroy native vegetation and compact soils, and further west, are the main cause of dust storms and water pollution. Yet, the Draft Plan fails to address those impacts. **Why is that?**

We believe the issue needs to be placed front and foremost, beginning with excluding livestock from all waterways. Also, while it could be argued that this is not strictly a NRM issue, animal welfare should also be a priority for LLS, to ensure all livestock are fed and provided shelter from the sun. We strongly believe that the keeping starving animals, and holding animals in paddocks with no shade, should be made criminal offences.

We assert that starving animals are the result of over-grazing at that point in time, and LLS, having levied rates on rural landowners on the basis of carrying capacity, is responsible for animal welfare.



***Trampled to death
the not so mighty Clarence***

LLS should also be far more proactive in this field, particularly in the Grafton area where the RSPCA has repeatedly failed to act on reports of these types of animal cruelty.

Water quality

When it comes to water quality, the current situation can only be described as scandalous, with the condition of local rivers completely unacceptable.



This is what the Orara River normally looks like.

Not only are those few existing laws governing erosion control not being enforced, but the NSW Government has actually recently enacted legislation that reduces the protection of waterways from erosion (Integrated Forest Operations Approval remake 2019). Those changes reduced buffer zones along all gullies, creeks and rivers, and allowed an increase in logging intensity including clear-felling.

The on-going fall in, dare we say, ‘plummeting’ water quality is acknowledged in the Plan from the outset (page 3), with the statement that: *“Waterway health is declining from riparian vegetation clearing, diffuse source water and sediment pollution, and invasive species; and the capacity of the land to sustain a range of productive uses and support natural ecosystems in the long term is at risk from declining soil fertility and erosion”*.

The above impacts have seemingly occurred under the stewardship of LLS, and its former entity, the Catchment Management Authority, along with the former Departments of Agriculture, Land and Water Conservation, Soil Conservation, and others. If all of those agencies have failed, and blatant illegal activity, such as the clearing of riparian vegetation, are still occurring, how is this latest plan going to fix the problem?

As a result, we believe Objective #17, i.e., *“Implement integrated practice change programs that deliver improvements in on-farm soil health (ground cover), native vegetation, water quality and biodiversity”*, will be extremely difficult, dare we say impossible, to implement within the general farming community. It has all been tried before under the now defunct Native Veg Act and other programs. Therefore, unless it is strongly supported as state and federal government level, and not turned into some political ‘football’ between “left” and “right”, we hold no expectations that this latest Plan will yield any better results.

Bushfire management

There is absolutely no greater threat to biodiversity on planet Earth than fire, greatly exacerbated by climate change and a rapidly heating world. However, while wildfire and changing fire regimes are acknowledged as a threat to NRM (page 19), we are horrified to find that there is no plan to prevent catastrophic fires from occurring.

Other than a brief reference to: “*Reinstating indigenous NRM activities, such as cultural burning*”, there is nothing, and the subsequent claim that it is, “*integral to building resilience to natural catastrophe*”, indicates that, once again, the Plan is purely reactive, aiming to deal with the consequences of catastrophes, rather than preventing them.

We, as a society, have been talking about the benefits of cultural burning for decades but, locally at least, the practice hasn’t progressed beyond the occasional field-day demonstration.

The reality is that, as a direct result of more than 200 years of damaging European presence in Australia, the forests of today bear absolutely no resemblance to those in which indigenous Australians developed their “cultural” burning. As a result of this, and the ongoing impacts of climate change, we have grave doubts about the ability to successfully undertake the practice today, or reap the claimed benefits that cultural burning will deliver.

Having said that, we strongly support giving cultural burning a red-hot try over a period of several years, to see if it can deliver the promised benefits for threatened species, and the environment in general. If it does prove to be successful, that would be great, but if it doesn’t, a **serious** bushfire management plan must be put in place as a matter of extreme urgency. In fact, given the clear warnings that the scientific community have been issuing for decades about worsening bushfire conditions, a plan should have been developed and implemented long ago. The fact that it hasn’t, is a major indictment on all governments over the past four decades.

If LLS is serious about long-term environmental protection, and for that matter, serious about erosion control, water quality, or sustainable agriculture, a serious long-term bushfire strategy is paramount. A strategy that prevents catastrophic fire, not merely trying to mitigate the impacts.

The reality is that with a heating planet, the fire threat can only worsen. To combat that we desperately need a highly mobile, professional, fully equipped fire-fighting force, with rapid response capabilities to deal with it. Surveillance is the key, so that during catastrophic fire conditions, within 30 minutes of smoke being detected, there are aircraft dropping water on it and ground crews on their way.

We cannot allow fires to rage out of control as they did in 2019 because, if we do, we stand to lose entire ecosystems and the fauna that depend on them, and as such, we believe LLS should once again be far more proactive in dealing with the problem, even if only forcefully bringing the matter before state and federal authorities for serious discussion.

Forestry

We have already written about some of the negative impacts of native forest logging in state forests, particularly in respect to water quality. However, it needs to be recognised that there is an even greater threat to biodiversity from private native forestry (PNF), an industry directly under the control of LLS, and is supposedly regulated under a weak and ineffective code of practice which has only recently been weakened even further.

Referring directly to agriculture, forestry and fishing, the Plan claims (page 15) that: “*The Region has a large and capable NRM industry base that is actively engaged in the sustainable resource management*”. Frankly, we strongly disagree with this statement!

The timber industry in particular has been unsustainably logging in our region since the mid 1830's when it began its onslaught on Red Cedar, ultimately driving that species to virtual extinction within 50 years. It then set its sights on the majestic Hoop Pines which turned hundreds of years old trees into box wood, and by the time cardboard cartons became popular after the second world war, that species too had been logged to the brink.

Then it was the turn for hardwood, with the industry plundering ancient Eucalyptus forests. One hundred years ago, 2m diameter trees were being loaded onto trucks, 50 years later log sizes seldom exceeded 1m diameter, a log size current forestry workers can only dream about as they cut the 'saplings' that are all that remain today.

So let us not try to peddle the myth of "sustainable logging", and focus on the reality, that native forest logging has never been sustainable, and has not been economically viable for decades. The following headline from the Herald earlier this year, reporting: "*The state-owned Forestry Corporation suffered a \$20 million loss last year, with NSW taxpayers forced to pay \$441 per hectare to log critical native forests*", says it all.

Logging of public native forests has to end, and in terms of PNF, where the regulator has routinely failed to enforce the code of practice since it was introduced, changes must be implemented to ensure real ecological sustainability. We believe there is a role for LLS to explore alternative income streams whereby landowners can earn an income from retaining forests over the **long** term. By long term, we mean in perpetuity, not as with one current scheme that pays landowners to leave their forests alone for just 20 years, after which they are free to recommence logging. That is nonsensical.

Increasing community engagement where it matters

Earlier in this submission, we mentioned the huge, 'blank' area across the Clarence Valley which is seemingly not considered to be worthy of a focus for NRM effort.

We pointed out that these properties were predominantly used for grazing, supplemented by periodic logging. We also agreed with the perception that LLS felt they would be wasting time attempting to encourage NRM in those areas, and understand why the Plan does not include farmers as Delivery Partners. At the same time, we know the much of that country contains threatened species and crucial habitat, and provides important wildlife corridors. Therefore, we feel there could be significant benefits for biodiversity if those landowners could be offered stewardship payments to protect any of those species, and/or their habitat, that occurs on their land. Most of that country is marginal, in terms of productivity, for both grazing and forestry, and many of those landowners and/or their partners, engage in off-farm employment to make ends meet.

Therefore, we suggest many would be open to the opportunity to become more engaged with NRM if a financial incentive, with proper oversight, could be offered. Large amounts of money are already being spent on site-managed programs under the 'Saving Our Species' scheme, and we see this as complementing, or even reducing the need for those programs.

We should point out that it is in these areas where much of the core habitat occurs for species such as the Koala, Rufous Bettong, Glossy-black Cockatoos, and many others, all of which, particularly the slow-moving Koala, are highly susceptible to impacts from the on-going burning off that is occurring.

Therefore, the newly released Koala Recovery Plan, coupled with the recent listing of Koalas as endangered in NSW, should facilitate funding opportunities that could be channelled into such a stewardship scheme.

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These are some suggestions (wish list) that we sincerely hope can be incorporated into, or promoted by, the NRM Plan, and we welcome any feedback.

We thank LLS for the opportunity to comment.

Yours sincerely



John Edwards
Honorary Secretary