

SUBMISSION
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DRAFT NATIVE VEGETATION REGULATION 2012
by
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Everyone accepts that there have been changes to Australia's vegetation since European settlement. In some cases, however, these changes have comprised the replacement of one type of native vegetation by another type of native vegetation or the dominance of one particular species of that vegetation. The Native Vegetation Act effectively assumes that the native vegetation that exists at this particular time is the preferred form of vegetation. This assumption needs to be questioned.

I was raised on a 1,000Ha wheat and sheep farm located midway between Brookton and Corrigin in W.A. (200km east of Perth), a farm that had been virgin country taken up by my father in the early 1900s. My wife and I also owned and operated a farm on the Monaro and in conjunction with our younger son and his wife now operate a 940Ha mixed farm at Harden, N.S.W. Natural resource management activities that I was involved with during the 1990s include:

- Chairing the first Landcare Group formed on the Monaro
- Chair of the Upper Murrumbidgee Catchment Co-ordinating Committee
- A member of the Murrumbidgee Catchment Management Committee
- A member of the NSW Vegetation Committee
- A member of the Serrated Tussock Task Force
- A member and then Chair of the Study "The Community Development of Perennial Grasses for Multiple Ecological Uses".

I was one of the authors of the booklet "The Australian Landscape, Observations of Explorers and Early Settlers". I also spent 25 years working as an engineer with the SMA/SMEC on hydroelectric and other water resources projects in Australia and South East Asia. It was while heading up a team carrying out the feasibility study for a potential major hydroelectric project in north Queensland during the 1980s that I became aware that many commonly held beliefs about native vegetation cover are incorrect.

A study in Tasmania (R C Ellis – Long-term Effects on Vegetation and Soil of Burning or Not Burning) found that with the exclusion of fire, a grassland could be overgrown by rain forest within 100 to 130 years. I have also observed many areas that have been wet sclerophyll that are now overrun by rain forest. Although not in N.S.W., a readily accessible example of this is the Mt Glorious National Park near Brisbane.

In other cases, what was grassland has been overgrown by eucalypts. Stewart Rylie in 1840 (Journal of a certain tour in 1840) described the Kybean Range to the east of Nimmitabel as "*The mountains comprising this range are all bare of timber (except in the gullies) and are covered with species of heath and coarse wiry grass.*" This area is now a wilderness area to

protect old growth forest. As another example, based on photos taken during the 1950s, there has been a significant increase in the trees and shrubs in the Kosciusko National Park since that date.

Ian Pulsford in a doctorate thesis (1991) “History of disturbances in the white cypress pine (*Callitris glaucophylla*) forests of the lower Snowy River Valley, Kosciusko National Park” estimated that the original tree density had been 20 to 30 trees per hectare. He put the current density at 2,000 to 3,000 trees per hectare with the proliferation in the number of callitris pine occurring during the 1870s. Eric Rolls in “A Million Wild Acres” postulated that the original tree density in the Pilliga region had been 3 to 5 trees per hectare and the proliferation of the callitris pine in the Pilliga also occurred during the 1870s.

Channel 9, about 2 years ago, produced a program showing the change that had occurred to the vegetation in the rangelands in western N.S.W. Areas that had been grasslands are now covered by shrubs and even quite large trees. In the program it was stated that an enquiry into the changes in the rangelands vegetation had been carried out in the early 1900s.

The above are examples of where the native vegetation that exists now is significantly different from the native vegetation that existed at the time of European settlement. The critical question is whether the vegetation that exists now and is protected by the Act is preferable to the native vegetation that existed at the time of European settlement or even some form of introduced vegetation such as non native pasture.

There can be no doubt that rain forest is a serious threat to wet sclerophyll. The wet sclerophyll has a rainfall cut-off on one side and is being encroached by rain forest on the other side. As a minimum, steps need to be taken to stop further encroachment of the rain forest into the wet sclerophyll.

In areas where there has been a significant increase in the number of trees, such as the lower reaches of the Snowy, the Pilliga and at least some parts of the Kosciusko National Park, there are strong grounds arguing that the present vegetation is less desirable than the vegetation that existed previously. With the high density of trees, there is no longer any grass cover making these areas prone to erosion. The areas are also more prone to intensive fires, causing considerable destruction and loss of native animals. Rainfall events after a severe fire result in rapid runoff causing extensive erosion and sedimentation of streams that can impact on aquatic life. Following the publication of “The Australian Landscape” I was contacted by 4 people who had previously grazed cattle in what is now the Kosciusko National Park and had recently been back into the Park. They all commented that there was less bird and animal life in the Park now than there had been when it was more open. While many people dismiss anecdotal evidence, these people by the nature of their work were keen observers of the environment. Their observations are also supported by a WWF study of the Monaro grasslands that found there was greater biodiversity in areas that had been grazed compared to areas that had been locked up. In view of the above, I believe that there can be no doubt that the vegetation that currently exists and is protected by the Act is inferior to the vegetation that existed previously.

The shrubs and trees that have overrun what was grassland in western N.S.W. have choked out the grasses leaving the soil bare and vulnerable to erosion. In addition to being more vulnerable to erosion, the land that previously provided grazing for both domestic and native animals is now essentially worthless from either biodiversity or commercial considerations. Once again, there are strong grounds for stating that the vegetation that currently exists and is protected by the Act is inferior to the vegetation that existed previously.

While the intent of the Native Vegetation Act is commendable, the reality is that it has produced or is protecting outcomes that have a negative environmental impact. There is now a lot more information available than when SEPP46 was pronounced and the Native Vegetation Act was drafted. Rather than amendments, the Act needs to be completely reworked by people with knowledge and experience in these matters.