From: [redacted]
Sent: Tuesday, 21 August 2012 8:54 PM
To: EHPP Landscapes & Ecosystems Section Mailbox
Subject: Native vegetation review

Dear Sir/Madam,

Please find attached the submission to the NSW Native Vegetation Review

I trust you will consider the submission as outlined

Regards

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Review of Native Vegetation Legislation
NSW Office of Environment and Heritage
NSW Government

21st August 2012

Introduction:
Having attended a meeting in Tamworth on the 20th of July, I would like to make some comments on how the draft code of practice for managing INS will affect my ability to sustain and improve my property. Having a copy of the code of practice I will attempt to comment on each section 1 – 10.

1. Purpose of the Code of Practice
The code of practice for re-establishing native vegetation is commendable, however we must not loose sight of the diversity we are trying to re-establish.

Are we trying to return to the pre-settlement days?
To a landscape nature held in balance, with some aboriginal influence (mainly fire)? Will we set a date (1990 – 1980 – 1970) and start from there?

The damage has been done 50 years before these dates. And it was not until the 1960's we saw the repercussions for INS.

We cannot start over, but there must be a date somewhere in the 1960's or 70's when nature relinquished her control over INS.

There is ample documentation (aerial photos, maps etc) of the extent of INS in the late 1960's to mid 1970's. The balance was right on well-timbered country (white cypress contained in small areas).

I feel this is the point we should look at to conserve and create a climate for the regeneration of numerous trees and shrubs white cypress has out competed over the last 40 years.

2. Area of Application of the Code
Area of the code covers a wide range of trees and shrubs making it difficult to control them with one set of regulations (I think the Namoi CMA is doing this well).

3. Species declared INS in the Namoi Catchment

Declared INS in the Namoi catchment has been well covered. In my case white cypress / hopbush / sifton bush and sticky daisy bush (shiny leaf).

Apart from white cypress, hopbush is causing most problems. Sheep have been removed from a lot of this country whilst cattle and kangaroos don't appear to eat seedlings.

As with all INS, fire has always been nature's control. In country left in its natural state it will eventually burn with a lightning strike.

Pine however does not produce litter and within 12 to 20 years removes all vegetation within its drip line, thus protecting itself.

300 years in the past fire must have occurred every 20 – 30 years to create the vegetation landscape.

4. Species must be acting invasively

- Cypress pine spreads from seed at about 100m per year on flat ground on dense stands.
- A single tree on a hill can cover 500m with wind blown seed.
- Seeds washing down creeks forms lines of pines on banks – roots hold soil together however most vegetation is removed.
- Sticky daisy bush follows shade on larger trees – hopbush is windblown 50 – 100m per year.
- Sifton bush travels on stock and wind

Of all these 4 species, pine has the greatest ability to change a vegetation community, particularly on steeper country with greater water velocity.

The question is how far back do we go through the three generations of pine since the 1970's to control it.

5. Clearing Types Permitted

Burning to control INS is an obvious and time proven answer, however there is a price to pay on the biodiversity of an area. Dense pine has no ground cover after year 10 and is almost impossible to burn.

Vegetation to carry fire will grow within the other species.

My preference for clearing cypress has to chainsaws and brush cutters (hard work / expensive and dangerous) but above all highly selective and no soil disturbance.

6. Clearing types and circumstances not permitted

The problem with a number of INS is that they are not noticed until they have become a paddock scale area. I feel the CMA has to have more flexibility regarding decisions on local species in local areas.

Over the past 20 – 30 years steeper hilly country has been approached and legislated towards being shut up and forgotten and all will be well.

This is the country under dense stands of pine that is suffering massive erosion and scald problems. Lack of ground cover and high water velocity are a disastrous combination in hilly country.

This country is typically well covered with box – I fail to see why we need pine as well.

7. Calculating the area affected by INS

I feel the area of INS covering a property needs to be linked to a period of time. In the 1950's INS was visible from 3% of 6000ac, primarily consisting of individual old trees (1st generation).

In the1970's, the 2nd generation transformed this to 5-10%

In 1985, the 3rd generation extended this to 15 – 20%

In 2000, the 4th generation moved this on towards 40-50%

In 2012, the 5th generation is now 70-75%

Following a wet summer there is a massive generation of small pine 10cm tall. I presume this is occurring all over northern NSW. Scatter sifton bush (5%) can be found on the property. Sticky daisy patches under trees are reaching 30% and Hopbush 40% and spreading.

The percentages of INS I have included range from dense stands to isolated plants and inspite of continued seedling control and rotational grazing the problem continues to escalate.

8. Soil and Ground Cover Disturbance

The only soil surface disturbance with management burning should be the bulldozer pushing a firebreak around the perimeter.

The result of clearing regrowth without soil disturbance (chainsaw) is instant ground cover (up to 50%). In trials we have run in a 12-

month period using 20m transects the standing thick pine remained bare and a botanist documented 62 species of vegetation in the cleared pine. Stock had been excluded for 12 months and transects were 20m apart.

9. Regrowth is protected

I am unsure of the wording of clearing under a RAMA the second time around. Does section 19 over ride a RAMA? It seems that after using a RAMA to clear INS everything from that point is protected irrespective of being declared INS or not.

10. Limitation on the Clearing Methods

- Fire 80% of area can be burnt (this is certainly enough and 250Ha in 2 years is a much as most people could manage)

- Only 80% of INS can be cleared – Any INS that has no economic value (non millable pine) and no environmental value (weigh up the damage) should not be retained.

- Trees up to 20cm can be cleared is quite reasonable, however if the 1990 date is moved back to possibly 1980 or 1970 then there should be an accompanying increase in diameter (towards 30cm).

- A point of contention of course are old individual trees left behind on rocky knobs, protected from fire probably 200 years old and just waiting to start the whole process again.

- 20 stems / Ha of INS to be retained is insanity. If the country is grassy box woodland and has a stem density of Box / Kurrajong / Gum etc to keep even the most ardent environmentalist happy why would you destroy it by leaving white cypress in the mix (this clearly has to change)

- Ins to be retained 30m from bank of creek – if the INS is going to jeopardise the vegetation on the bank of a creek it should be treated the same as the adjoining area.

- There is an argument for soil testing and improving the sulphur deficiency (aerial supering) after regrowth has been removed. This can only be done once otherwise the balance of native grasses is at risk

- PH is bordering on neutral (6.8 – 7.0) even under pine, but apart from a few nitrogen fixers like Glycenes and Hoveas nitrogen is scarce

- Most country invaded by INS has little clover so I feel there is a case for introducing non-native clover or legumes.

In conclusion, just a few comments:

As a family we have been on this property for 5 generations, I have been here for 72 years and have observed a lot of changes since 1940.

Country, which for many years was under-stocked at 1 DSE, is now impossible to muster.

Pristine permanent creeks are now carrying up to 1m of silt, and 2000ac has no water in a dry spell.

Our carbon trials (CMA) indicate that we have an average of 46 tonnes per hectare of sequested carbon in soils in grassy box country (no pine).

There is no better way of storing carbon than grass and trees – with leaves (not needles).

Hoping this can be of some assistance.