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From: [REDACTED]
Sent: Friday, 24 August 2012 9:24 AM
To: EHPP Landscapes & Ecosystems Section Mailbox
Cc: [REDACTED]
Subject: Comments on draft Native Vegetation Regulation 2012

Comments on draft Native Vegetation Regulation 2012

To: The NSW Office of Environment and Heritage
From: David Salt, [REDACTED]
(mobile ph: [REDACTED] / email: [REDACTED])
Date: 24 August 2012

Thank you for the opportunity to provide feedback on the draft Native Vegetation Regulation 2012.

I believe the basic thrust of the outlined changes is wrong and will encourage irreversible loss of native vegetation in NSW. This at a time of accelerating biodiversity loss and increasing uncertainty associated with the growing impact of climate change.

The introductory factsheet you provide on the changes begins with the statement: "The widespread decline in native vegetation has been identified as one of the major environmental issues facing Australia. Impacts include dryland salinity, weed invasion, soil erosion, poor water quality and the direct loss of plants animals and their habitat."

This is all demonstrably true. Then the rest of the information you provide details how the new regulation enables an acceleration of this decline by making it easier to clear native vegetation.

At a recent biodiversity forum here at Australian National University (in the Fenner School of Environment and Society, see <http://fennerschool.anu.edu.au/fenner-school-forum-series-2012-audio-recordings>), Dr Philip Gibbons told the audience that since the native veg legislation had been enacted in NSW there had been a 20% increase in net loss of vegetation. If this is happening under existing protection, stripping back that protection will only make things worse.

Of specific concern is the reduced protection to paddock trees. It's long been known that paddock trees in much of Australia's temperate grazing region are not regenerating. With every year we lose a few more as the old trees die but nothing is coming through to replace them. In recent years there's been a growing realisation that the situation is rapidly evolving into a crisis.

According to recent research by Fischer et al (2009), under existing management practices, millions of hectares of grazing country, currently supporting tens of millions of trees, will be treeless within decades from now. And the loss of this tree cover is predicted to lead to massive declines in biodiversity and grazing productivity. They studied a 1,000,000 hectare area in the Upper Lachlan catchment of New South Wales. Typical paddock trees are often over 140 years old, and in many locations, no young trees have regenerated for decades.

The message being conveyed in the new regulations, however, is that

farmers should be able to remove paddock trees with as little regulation as possible.

Another extremely troubling aspect of the changes is the shift towards watering down compliance and taking the emphasis away from penalising rule breakers. As it is, illegal land clearing is rarely penalised so this new shift will just make a bad situation worse.

I urge the NSW Government to reconsider these changes in regulations. Instead of making it easier to clear, existing regulations should be strengthened not weakened to provide greater protection to native vegetation.

Reference

Fischer J, J Stott, A Zerger, G Warren, K Sherren, & RI Forrester (2009) Reversing a tree regeneration crisis in an endangered ecoregion, PNAS, [ttp://www.pnas.org/content/106/25/10386](http://www.pnas.org/content/106/25/10386)

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David Salt

