

Please attach the following **one-page summary** to your submission.

Comments on the Interim Report for the Independent Review of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)

Summary

Name of author/organisation:

Circular Head Branch Timber Communities Australia

Contact details:

Andrew McMaster

President

Smithton

Date:

Monday, 3 August 2009

Which chapter(s) of the interim report are you commenting on?

6 Forestry

Key points of submission

(please identify up to three main priorities or focal points of your submission):

Concerns that there may have been a lack of balanced input in preparation of the reviews report.

More importance needs to be placed upon the fact that Tasmania's RFA now reserves 97.5% of high quality wilderness as determined by the National Wilderness Index.

Branch members are extremely proud of the balanced achievements made by the Tasmanian RFA process, and seek to have those achievements reflected in the final reviews report

References (if possible, include a bibliography of any documents you may wish to make available)

Professor in Mackey, B.G., Soulé, M.E., Nix, H.A., Recher, H.F., Lesslie, R.G., Williams, J.E., J Woinarski, C. Z.R., Hobbs, J. and Possingham, H.P., 2007, Applying landscape-ecological principles to regional conservation: the WildCountry Project in Australian. Key Topics and Perspectives in Landscape Ecology. Cambridge University Press, Edited by Jianguo Wu and Richard J. Hobbs.

The Wilderness Society, WildCountry Panel available at http://www.wilderness.org.au/articles/wc_science

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Do you want this submission to be treated as confidential?

(please state 'yes' or 'no') no

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Circular Head Branch

Smithton Tas 7330

President
Facsimile
Secretary



**Timber Communities Australia
Tasmanian State Office**

Tas 7026
Phone:
Fax:
Mobile:
Email:
[Http://www.tca.org.au](http://www.tca.org.au)
A.B.N. 33 008 665 736

Submission to

Interim Report for the Independent Review of the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*

Members of the Circular Head Branch of Timber Communities Australia are extremely concerned that there may have been a lack of balanced input in preparation of the reviews report. TCA research shows that there may have been a predetermined view opposing the achievements of the RFA process held by some providing that input.

This is despite the fact that the Tasmania RFA now reserves 97.5% of high quality wilderness as determined by the National Wilderness Index.

The world class achievement is also dismissed by the Wilderness Society in its substantive submission to this review;

In paragraph 6.63 the review states Still Wild Still Threatened also submitted that the science of the agreements was 'overwhelmed by political interference'. Similarly, the International Fund for Animal Welfare suggests that 'serious flaws in the information and scientific process underpinning the RFAs undertaken to date have been identified.'

Following TCA's check of the references shows that the first claim is based on a letter of "concerned Scientists" released during the 2004 Federal election campaign by the Wilderness Society, the second group quotes a Bond University study that in turn quotes criticism from the Wilderness Society.

Therefore the independent reviewer needs to be made aware of the following relevant extracts of the paper co authored by Mackey, B.G., Soulé, M.E., Nix, H.A., Recher, H.F., Lesslie, R.G., Williams, J.E., J Woinarski, C. Z.R., Hobbs, J. and Possingham, H.P., 2007, *Applying landscape-ecological principles to regional conservation: the WildCountry Project in Australian. Key Topics and Perspectives in Landscape Ecology*. Cambridge University Press, Edited by Jianguo Wu and Richard J. Hobbs. This paper claimed that "only about 6 percent of Australia is in a secure protected area". This is despite the *Australia State of the Environment 2006 Independent report to the Australian Government Minister for the Environment and Heritage* by Beeton RJS (Bob), et al (2006 *Australian State of the Environment Committee*), published in 2006 stating "Australia's terrestrial protected areas... now extend across almost 81 million hectares or 10.5 per cent of Australia".

An extract of this paper, showing critical comment on the RFA is attached to this submission. Comment such as that the adequacy and representative criteria of the CAR reserve system was not met.

No wonder the reviewer report questions the effectiveness of the CAR reserve system.

Members of the Circular Head branch of Timber Communities Australia request that Chapter 6 *Forestry* be completely reviewed, as we totally disagree with the 'recommendations' that are formed on what we view as a incorrect basis that the CAR reserve system is scientifically flawed or in some way not adequate or representative.

Branch members are extremely proud of the balanced achievements made by the Tasmanian RFA process, and seek to have those achievements reflected in the final reviews report.

Andrew McMaster
President
Circular Head branch
Timber Communities Australia

Attachments

Extract from *Applying landscape-ecological principles to regional conservation: the WildCountry Project in Australian*

Given the importance of core protected areas to WildCountry, a logical starting point in defining the components of an appropriate scientific framework is to consider the criteria developed for the Australian Regional Forest Agreement (RFA) process (AFFA 2003). Three main criteria were adopted for the RFA, namely: comprehensiveness, adequacy, and representativeness (CAR). Comprehensiveness refers to the extent to which the pre-European distributions of forest ecosystem types are captured by the protected-area network. Representativeness refers to how well the within-forest type variability is sampled by the protected-area network. Adequacy refers to the likelihood that the protected-area network will ensure the long-term viability of the biodiversity that resides therein. In practice, the criteria of adequacy and representativeness were not substantially applied in the RFA process, and targets were only set for the first criterion – “comprehensiveness.” Thus, following extensive assessments, forest tenure was changed in each region so that a nominated percentage of the pre-European distribution of forest types ecosystems was included within the protected-area network. Targets were also set to ensure a percentage of the potential habitat of threatened and rare vertebrate animal and vascular plant species were captured within the protected-area network. Interestingly, wilderness targets were also prescribed but on the basis that wilderness quality reflects a social value of no biodiversity conservation relevance.

The RFA criteria, as applied to date, have been useful in helping to promote the implementation of explicit conservation criteria and systematic reserve design in Australia (e.g., GBRMPA 2003). While they remain relevant to WildCountry, it is equally important to appreciate their limitations. The RFA criteria ignore landscape condition and thus do not explicitly consider the impact of human land-use activity on ecosystem structure and function, and animal habitat. Furthermore, landscape variation in primary productivity was not considered. Thus, in identifying priority conservation areas the distinction was not necessarily made between heavily perturbed, low productivity and relatively intact, high productivity forests.

In practice, the setting of percentage targets for representation (i.e. the comprehensiveness criterion) proved to be a relatively arbitrary process without strong and explicit scientific foundation. In any case, it is arguable whether the concept of setting percentage targets for representation is relevant in intensively cleared landscapes where only fragments of native vegetation remain. In these circumstances it could be argued that all the remnant patches have conservation value. Similarly, experience gained from studying land degradation in southern Australia has yielded little by way of guidelines as to the ecologically permissible percentage of native vegetation that can be cleared within intact landscapes. In both these contexts, the risk with a CAR approach as applied in the RFA process is to promote ecologically and numerically minimalist conservation outcomes, whereas the WildCountry conservation objectives are expansive and long-term. Nonetheless, the CAR criteria as originally conceived remain useful and relevant to the problem of systematic reserve design, and as such are one set of inputs to a WildCountry scientific framework.