



The Goulburn Valley Environment Group Inc.

Po Box 2073 Shepparton Vic 3632 Ph/Fax 03 58 320222

e-mail gveg@shepparton.net.au

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GVEG EPBC Submission

RE: Vic & NSW Environment & Heritage/Natural resources management/Murray Valley NP NSW & Barmah NP Victoria/VIC & NSW/Eco thinning trial in NSW & Victorian River Red Gum Parks

Number: 2013/6713

The Goulburn Valley Environment Group wishes to comment on the proposed thinning trial in NSW and Victorian red gum forests, and particularly on the proposed thinning trials of red gum forests in Barmah National Park.

Our concerns primarily relate to:

- the poor scientific basis for undertaking the thinning trials in Barmah National Park
- the scope and type of thinning
- lack of any form of consultation to-date with local stakeholders.

In principle, our group is not adverse to ecological thinning trials or other adaptive-management trials occurring in Parks, so long as the planning and design of the trials is based on good science. In this case, however, the scientific basis for undertaking the trials in Barmah National does not appear strong. Firstly, an assessment undertaken of red gum stand condition along the Murray valley by Monash University researchers found that stand condition was influenced most strongly by frequency of flooding and concluded that *'dieback of these floodplain forests would be more effectively mitigated by increased water availability through flooding than by altering stand structure.'* (Cunningham et al. 2008). Secondly, assuming that there is a scientific basis for thinning trials, it would then make more sense that the trials be undertaken in red gum forests under the most ecological stress because of lack of flooding (e.g. Gunbower Forest or areas further west) rather than in areas of moderate to high stand condition, as in Barmah National Park. Consequently, because of the lack of scientific justification for locating the trials in Barmah National Park and the likely negative impact of the trials on Barmah Forest's internationally and nationally recognised natural values, Goulburn Valley Environment Group believes that the thinning trials should not proceed in their current form and definitely not in Barmah National park or other forests where increased flooding could be used more effectively to improve tree health.

We note additionally that:

- the scope of this project far exceeds VEAC recommendations both in size of project and size of timber to be thinned and fails to address VEAC concerns regarding the maintenance of Moira grass plains.

- the use of commercial harvesting equipment and practices in a Ramsar site needs much stronger justification in terms of a scientific design if it were to be approved, given the detrimental impacts of such machinery on a site considered a matter of National Significance

Now more than ever following the recent completion of the Murray Darling Basin Plan we must ensure the environmental management of our floodplains capitalise on water returned to the rivers as environmental flows.

John Pettigrew
GVEG President

Protecting the environment for generations to come