



Nature Conservation Council

The voice for nature in NSW

Local Land Services
State Operations
PO Box 2105
Dubbo NSW 2830
Submitted electronically

5 July, 2017

RE: Submission into Travelling Stock Reserves and Routes Review

Dear Sir/Madam,

The Nature Conservation Council of NSW (NCC) is the peak environment organisation for New South Wales, representing 150 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We welcome the opportunity to comment on the current review into Travelling Stock Reserves and Routes (TSRs) being undertaken by Local Lands Services (LLS) and Department of Industry – Lands. Please see our submission attached.

NCC has previously made submissions on the Crown Lands Legislation White Paper and the draft NSW Travelling Stock Reserves State Planning Framework 2016- 2017 (draft TSR Planning Framework). We have attached these for your reference.

Our organisation remains committed to the preservation of the whole TSR network. The TSR network represents an important environmental asset for NSW whose value is well documented¹.

NCC has representation on several advisory groups involved with the assessment and appropriate management of the TSR network. These include the Linear Reserves Project Steering Group, Roadside Environment Committee and Western Lands Advisory Council.

One member group of NCC, the National Parks Association of NSW (NPA) has been very active in promoting the conservation values of TSRs. NPA convened the Second NSW Travelling Stock Routes and Reserves Conference in 2011. We refer you to the NPA submission for further information.

Please contact Daisy Barham, Campaigns Director, on 02 9516 1488 or ncc@nature.org.au for any further information.

¹ Possingham H., Nix H. (2008) The Long Paddock Scientists' Statement.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Daisy Barham', followed by a period.

Daisy Barham

Campaigns Director

Nature Conservation Council of NSW

Submission - Travelling Stock Reserves and Routes Review

BACKGROUND

The Significance of the TSR Network

The TSR network provides *inter alia*²:

- Refuge areas for many threatened species and endangered ecosystems listed under state and federal legislation,
- Seed sources for environmental restoration programs,
- Opportunity for movement of native flora and fauna and therefore gene flow, particularly, between large areas of natural vegetation (e.g. national parks and state forests as well as other road reserves),
- Long, vegetated corridors representing many climates and soil types often being the best remaining examples of native vegetation in highly cleared landscapes,
- An opportunity for improving the conservation status of threatened ecological communities such as grassy white box woodlands,
- Habitat for a diverse suite of native plants and animals many of which are rapidly disappearing from agricultural areas, many at threat of extinction,
- Valuable ecosystem services such as carbon sequestration, which must be considered in any economic modelling and assessment of TSRs, and
- Potential refuge areas from climate change.

The TSR network also provides a diverse range of social, cultural and economic benefit to the people of NSW³. The importance of TSRs to the community has been made clear in submissions to the Crown Lands Review and the draft TSR Planning Framework. The Government has recognised community support for the retention of the TSR network in public ownership.⁴

² *ibid*

³ Bev Smiles, Cathy Merchant and Kirstin Proft (2011) The NSW travelling stock routes and reserves network Heritage – Habitat – Livelihood, published by NPA pages 35, 42-43.

⁴ Fact sheet – FAQs Open LLS website: “The community told us the importance of TSRs through the consultation process on the draft Local Land Services State-wide Planning Framework, through the development of the new Crown land legislation, and through the recent Parliamentary Inquiry into Crown land.”

The TSR Planning Framework

The adopted TSR Planning Framework contains a set of Guiding Principles to direct the development of Regional TSR plans.⁵ These are:

- Recognition of Aboriginal cultural heritage values;
- Recognition of historic European use;
- Maintain the conservation value and role in landscape connectivity of TSR;
- Sustainable use;
- Identification and co-existence of stakeholder values;
- Economic viability, cost recovery and user pays; and
- State-wide integration.

The Managing Travelling Stock Reserves for Sustainable Outcomes Project (MTRSOP)

The MTRSOP aims to assess the conservation significance of all TSRs, and to put in place management systems that retain and enhance conservation values of the network.⁶ An additional program is funding a similar project for roadside reserves and the methodology is applicable for the assessment of all linear crown land reserve remnants.

The MTRSOP is funded and now managed by the Environmental Trust. It has developed a Rapid Assessment Methodology (RAM).

We understand that MTRSOP is the “TSR conservation assessments under the Environmental Trust Project” referred to in the NSW Travelling Stock Reserves Review Public Consultation Paper (the TSR Review Paper) at page 16.

COMMENTS ON THE TSR REVIEW PAPER

Introduction

The purpose of the TSR Review Paper is collect information on the use of individual TSRs that will be used in a proposed statewide assessment of TSRs. Although the Review document states: “This review is not about a sell off of TSRs”, it nevertheless includes as one of the 4 categories of TSRs: “TSRs that are no longer used or valued”. It is not clear what the Government intends to do with TSRs that are categorized in this way in this review and the

⁵ Ibid page 4.

⁶ <http://www.environment.nsw.gov.au/resources/grants/160581-annual-report-2016-trust.pdf>

proposed statewide assessment of TSRs and are concerned lest this leads to break-up of connections within the network, particularly since we consider the uses and values as set out in the paper are inappropriate – see next section.

Uses and Values of TSRs

The TSR Review Paper contains a list of five uses and values of TSRs:

1. **Economic** —which includes farming, bee-keeping, and cultural and environmental tourism;
2. **Cultural** —both Aboriginal and European cultural heritage;
3. **Aboriginal rights and interests**;
4. **Recreational** —including camping, horse riding and provide access for fishing and walking trails;
5. **Environmental**.

We consider that these values and uses are arbitrary and fundamentally flawed. Firstly, there is no recognition of the significant economic, social and environmental benefits of ecosystem services that TSRs provide. These include sequestration and storage of carbon, and water and air purification.

Secondly, these uses and values are heavily inter-twined. For example, economic activities such as bee-keeping and environmental tourism rely heavily on healthy native ecosystems, and degradation of environmental values also adversely affects cultural values.

Thirdly, although in relation to environmental values and uses the Review Document states: *“TSRs contain significant environmental values including important remnants of native vegetation in highly cleared landscapes, endangered ecological communities and habitat for threatened species, such as koalas. The long, linear nature of the TSR network ensures that these species can move through and disperse across the landscape”*

The TSR Review Paper elsewhere focuses primarily on the uses of individual TSRs. Where it does refer to networks under “Evidence” it refers only to physical connectivity and not biological connectivity.

Accordingly, we are very concerned that the TSR Review, by focusing on individual TSRs, will overlook or undervalue the significant work that has been done by OEH, the National Parks Association of NSW and others that highlight:

1. The significance of the TSR network for biodiversity conservation and ecosystem services, and

2. The need to maintain the connectivity of the TSR networks for such conservation
3. Opportunities for re-vegetation and rehabilitation of vegetation communities if the TSR network is maintained.

It is beyond the scope of the resources of NCC to provide feedback on the environmental value of individual TSRs that have high conservation value. In 2006 DECC estimated that approximately 80% of TSRs had significant conservation value⁷. We would stress our particular concern with the TSRs in the Central Division of the state, which contain many endangered ecological communities and threatened species that are rare elsewhere.

Fourthly, there is no recognition of environmental restoration and habitat enhancement projects that are already occurring on TSRs. One such project is federally funded and is being carried out in the Riverina region.⁸

Your input on local TSR – Categorisation of TSRs

Below is the categorisation of TSRs provided in the Review:

- **Category 1** – TSRs that are only used for travelling stock or emergency management and biosecurity purposes.
- **Category 2** – TSRs that are used for travelling stock, emergency management or biosecurity purposes, but are also important and used for a range of other reasons.
- **Category 3** – TSRs that are not used for travelling stock or emergency management, but are important, valued and used for other reasons
- **Category 4** – TSRs that are no longer used or valued for any of the above reasons,

We consider the categorisation of TSRs in this way simplistic and unhelpful for management purposes. There is no recognition that some uses of TSRS are compatible and others are not. For example, intensive grazing under a grazing permit is not compatible with use of the land for conservation purposes.

Category 1 areas are likely to be areas of high environmental conservation values because they are only grazed intermittently allowing native vegetation to regenerate after grazing. They also provide ecosystem services such as carbon sequestration.

⁷ Department of Environment and Conservation State of the Environment Report (2006) p. 199..

⁸ Davidson, I. (2017). Enriching biodiversity in the NSW Riverina Bioregion by managing the TSR Network for nature conservation - A large scale habitat restoration project. Report to Murray LLS.

Given that climate change models predict increases in droughts, fire and floods in much of NSW, it is possible that the use of TSRs may increase and that areas in Category 3 and 4 may be used again for travelling stock, emergency management or for biosecurity purposes.

We are also very concerned that people responding to the TSR Review Paper may be unaware of the environmental significance of TSRs, particularly those that are apparently unused (Category 4). This is why we consider it so essential that current and previous survey work by OEH other than just the TSR conservation assessments under the Environmental Trust Project be fed into the proposed State Assessment of TSRs.

Evidence

We note that there is no reference to wildlife corridors, environmental restoration programs, fauna or ecosystems services in the evidence that will be used to assess TSRs. We consider that it is crucial that these matters are included.

Your input on local TSR

As indicated above, NCC is concerned that the TSR Review is only seeking information on individual TSRs and is adopting the categorisation of TSRs which about which we raised concerns above. By doing so, the TSR Review Paper assigns categories to specific TSRs without seeking public comment on whether those categorizations are appropriate. As indicated above, we question whether the extensive existing information of the biological connectivity and biodiversity significance of the entire TSR network will be incorporated into the review.

Proposals to access TSR land

We consider that some of the criteria to be considered are vague and need clarification. For example criteria (2) what is meant by “critical for public use” is not explained. We consider that existing public access should be maintained.

It would appear that criteria (1) and (3):

“Would not significantly impact on the integrity of the existing TSR network at a local or regional scale. This might include considering how large the TSR is, the location of the TSR and the zoning of the land surrounding the TSR.”

and

“Would not cause any fragmentation to the TSR network. ”

refer only to physical connectivity and not biological connectivity between reserves. They should refer to both.

- Criterion (5) uses the terms “other public values” without clarifying what these values may be.

We consider that “the broader social, environmental and economic impacts and benefits” should be considered in accordance with the principles of ecologically sustainable development. This ensures that there is an integrated consideration of environmental, social and economic considerations. The criteria given in the TSR Review Paper are heavily weighted to economic considerations only.

Some activities are likely to materially harm the TSR network, are contrary to ecologically sustainable use of TSRs and continued public access to the TSR network. For example, mining exploration and production, the construction of long distance pipelines and other infrastructure, logging and continuous or intensive grazing, will undermine the environmental, social, cultural and heritage values of TSRs.

Pilot Assessment

We consider that these assessments should be done in an accountable and transparent manner unlike the previous Crown Land pilot studies. We consider that public input is essential and that the public should have the opportunity to comment on the reports from the pilot studies before Government acts them on.

Statewide Assessments of TSRs

A statewide assessment of TSRs is proposed that will rely on information from:

- “this consultation process;
- the results of TSR conservation assessments under the Environmental Trust Project;
- advice from targeted stakeholder consultation.”

As we have indicated above, we consider the Review Document to be flawed in many respects so we are not optimistic that the resulting consultation process will provide high quality objective evidence on the current use of TSRs.

Although we are pleased that the TSR assessments under the Environmental Trust project, which we understand incorporates the development of the RAMs, will be fed into the assessment process we are concerned that other scientific studies of the environmental values of TSRs are not proposed for consideration.

We also are puzzled that the proposed assessment is being undertaken entirely separately from the TSR regional plans that are being prepared under the principles set out in the adopted TSR Planning Framework. We consider that the results of the TSR conservation assessment should also feed into the TSR regional plans as well as information from other scientific studies and assessments and current restoration programs carried out on TSRs⁹

NCC looks forward to taking part in the targets stakeholder consultation for the statewide TSR assessment.

CONCLUSION

We urge the Department of Industry – Lands and LLS to:

1. Maintain and manage the current extent of the TSR network until the proposed statewide TSR assessment is completed,
2. Utilise all relevant scientific data on the environmental significance of TSRs including their importance in biodiversity conservation in the proposed statewide assessment of TSRs rather than just TSR conservation assessments under the Environmental Trust Project,
3. Ensure that the outcomes of the proposed statewide conservation assessment of TSRs and other relevant scientific data and assessments, and findings of restoration studies feed into the preparation of regional TSR plans.

NCC also considers that it is imperative that the Government provide adequate, ongoing, NSW-wide funding to LLS to ensure the continued management, maintenance and enhancement of significant environmental values identified in the conservation assessment and management plan processes.

⁹ Davidson, I. (2017). Enriching biodiversity in the NSW Riverina Bioregion by managing the TSR Network for nature conservation - A large scale habitat restoration project. Report to Murray LLS.