

***SUBMISSION FROM
THE BARMAH FOREST
CATTLEMEN'S
ASSOCIATION
TO THE
RIVER RED GUM
INVESTIGATION***

THE BARMAH FOREST CATTLEMEN'S ASSOCIATION HAS NO CONFIDENCE THAT THE VICTORIAN ENVIRONMENTAL ASSESSMENT COUNCIL (VEAC) CAN FAIRLY AND COMPETENTLY COMPLETE THE RIVER RED GUM INVESTIGATION

THEREFORE THIS SUBMISSION IS LODGED WITH VEAC UNDER PROTEST AND IT IS ALSO SUBMITTED TO MEMBERS OF THE PARLIAMENT OF VICTORIA AND WITH INTERESTED INDIVIDUALS AND COMMUNITY GROUPS

October 2007

EXECUTIVE SUMMARY

In this submission the Barmah Forest Cattlemen's Association responds to the Draft Proposals Paper released by the Victorian Environmental Assessment Council (VEAC). This submission largely follows an earlier submission in which references were cited to support its claims that controlled grazing of cattle is not incompatible with biodiversity conservation.

Indeed, the main point made by this submission is that after 150 years of continuous grazing, cattle have established a mutually beneficial relationship with indigenous species in the Barmah Forest. The Forest is in good condition and no species are under serious threat within the Forest.

Nevertheless, the Cattlemen's Association says there is a need to focus primarily within the Barmah Forest on biodiversity conservation. The Association says the best way to do this is to start with the current situation and incrementally improve management of the ecological community. The extreme solution (creating a National Park) is not necessary. Cattle, grazing at low stocking rates over wide areas, have been shown to actually enhance biodiversity conservation.

1. VEAC's PERFORMANCE The first point made in this submission is that VEAC has not competently carried out its Terms of Reference for the River Red Gum Investigation and there are strong indications of dishonesty that VEAC must answer. The Cattlemen's Association says the River Red Gum Investigation should be taken from VEAC and continue under a competent neutral authority that can review all the submissions received by VEAC.

2. BIODIVERSITY The Cattlemen's Association acknowledges the concept of biodiversity but says the VEAC definition of biodiversity must be broadened to include both agricultural and wild biodiversity and the links between the two. Further, alongside a widened definition of biodiversity conservation, the Cattlemen's Association suggests the concept of mutualism – there is a mutually beneficial relationship between cattle and other species that enhances the survival, growth and fitness of the whole Barmah ecological community.

3. NATIONAL PARK Because a National Park has not been even remotely justified in the VEAC Draft Proposals Paper; until there is clear evidence for changing the classification levels of the Barmah Forest, the Barmah State Park and the Barmah State Forest should continue to be managed under their current classifications. Secondly, because there is no evidence of imminent danger of serious and irreversible environmental harm to the Barmah Forest, the principle of closing the park as a precaution must be rejected in favour of ongoing action research to ensure biodiversity conservation. The Cattlemen's Association says the River Red Gum Investigation must use the current Barmah ecological community as the base-line for future action for maintaining and encouraging biodiversity conservation and there must be a serious longitudinal study of the ecology of the Forest and the effect of human-induced change.

EXECUTIVE SUMMARY (continued)

4. MANAGEMENT The Cattlemen's Association says VEAC's proposals for majority indigenous management are ill-considered, impractical and ignore existing local expertise. The Association has constantly said there must be genuine community-based management based on:

- broad representation of stake-holders;
- respect for and involvement of the traditional owners;
- co-operative resolution of conflicts over rights and uses;
- informed, transparent, participatory decision-making; and,
- diverse, well-considered and monitored use of forest resources.

5. CATTLE GRAZING It is clear to the Cattlemen's Association that VEAC accepted without question the opinion of an anti-grazing lobby. The Association says that rather than simply excluding cattle from the Barmah Forest, the River Red Gum Investigation must continue but by using the current Barmah ecological community as the starting-point for future action and the Investigation must include:

- Development of a baseline assessment of the natural and cultural resources in the Barmah Forest;
- Determining the health of the Barmah Forest under the current management regime;
- Development of restoration and revegetation techniques (if areas are found to be degraded or species found to be under threat);
- Development of methodology to be used to monitor grazing activities so cultural and natural resources are conserved; and,
- Development of grazing management practices which would promote and be complementary to biodiversity conservation.

Because of serious concerns held by the Cattlemen's Association about VEAC's performance this submission is being lodged under protest. However, whether the River Red Gum Investigation continues under VEAC or another more credible authority, the Cattlemen's Association in this submission will address four major issues:

1. Biodiversity conservation;
2. National parks;
3. Management of public land; and,
4. Cattle grazing on public land.

Much of this submission has been drawn from the detailed submission lodged in December 2006 and in the interests of brevity the references cited will not be repeated.

The Association's 2006 submission is on public record.

PRELIMINARY COMMENTS

This submission responds to the Draft Proposals Paper released by the Victorian Environmental Assessment Council (VEAC) in July 2007. The Barmah Forest Cattlemen's Association also lodged an earlier submission in response to VEAC's October 2006 Discussion Paper. The Cattlemen's Association confirms the opinions expressed in its 2006 submission.

In its earlier submission (and again in this submission) the Cattlemen's Association says that, although it has views that extend beyond the scope of grazing in the Barmah Forest, the Association will restrict its submission to its main area of expertise. Both submissions raise the issue of biodiversity and the relationship between the concept of biodiversity and cattle grazing. Both submissions discuss strategies for encouraging and restoring biodiversity.

In this submission, as well as expressing concern about VEAC's performance, the Cattlemen's Association will address four major issues:

- Biodiversity conservation;
- National parks;
- Management of public land; and,
- Cattle grazing on public land.

Much of this submission has been drawn from the detailed submission lodged in December 2006 and in the interests of brevity the references then cited will not be repeated. The Association's 2006 submission is on public record.

1. VEAC'S PERFORMANCE

Right from the outset of the River Red Gum Investigation, the Cattlemen's Association was concerned about the performance of VEAC. The Association's concern began with observations of bias but after the release of the Draft Proposals Paper in July 2007 VEAC's competence to carry out its Terms of Reference was in serious doubt. From that Paper there were also indications that VEAC pre-determined its 2007 proposals for National Parks.

1.1 BIAS

In its December 2006 submission, the Cattlemen's Association warned against bias apparent in the VEAC 2006 Discussion Paper saying:

"... there is an inherent bias in the VEAC Discussion Paper that must be resisted and corrected during the consultation. Clearly seen (even as early as Page 1 of the Paper) is a bias toward considering any use of the land as a "demand" that is "competing" with biodiversity protection. The Cattlemen's Association objects to this prejudicial stance. In this submission the Association will prove there is a mutually beneficial relationship between wild and domestic biodiversity".

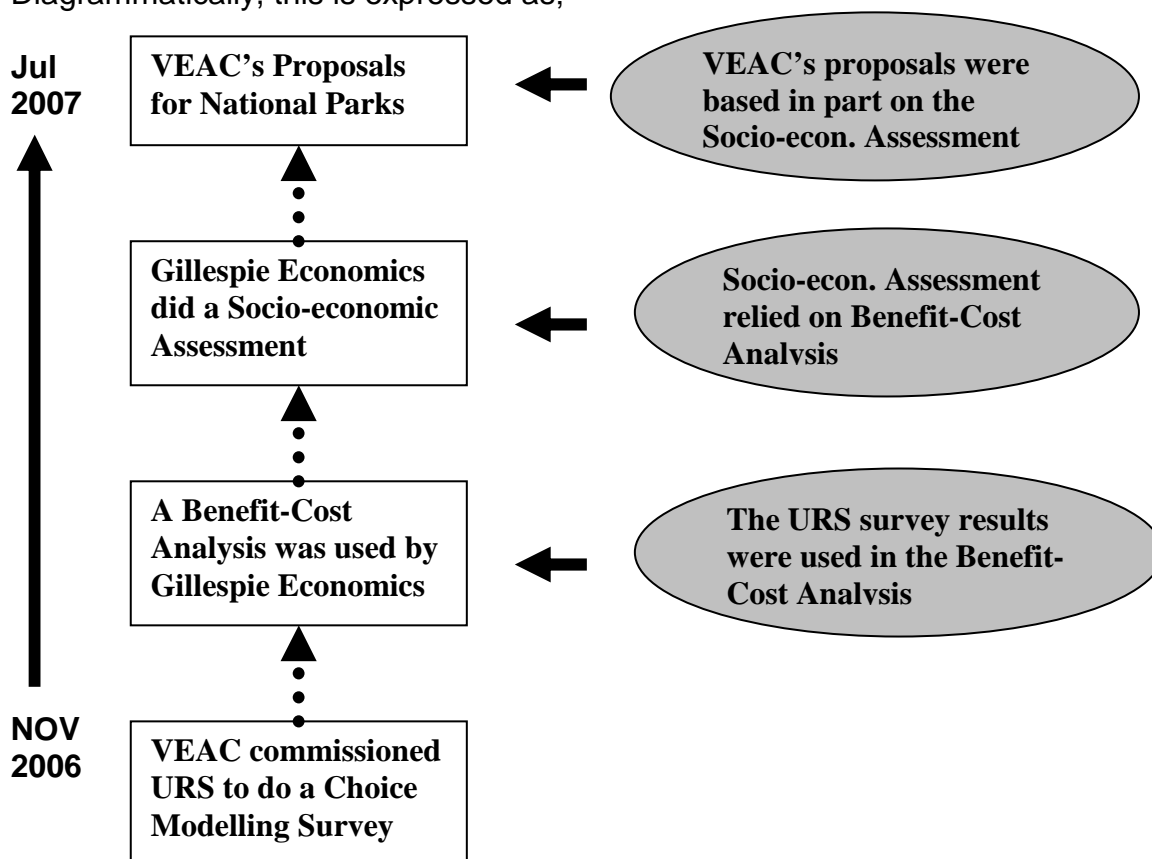
VEAC's 2007 Draft Proposals Paper shows this warning was not heeded. For example, in the Draft Proposals Paper the only options considered for the Barmah Forest were either a "do-nothing" option or a national park.

There was no mention at all of an enhanced win/win management regime which could primarily focus on biodiversity conservation but also allow for sustainable use of the Forest. For example, the Cattlemen's Association's 2006 submission was both broad and specific – covering matters of broad principle like biodiversity conservation, the precautionary principle and Protected Area Network (PAN) parks. The submission was also based on the lifetime experience of cattlemen - in specific detail, the Association made suggestions on, for example, management of the Barmah Forest. There is no indication these considered options were taken into account by VEAC.

1.2. INDICATIONS OF DISHONESTY

In the absence of any explanation from VEAC, it appears as though well over 1000 people and organisations making submissions to VEAC wasted their time – VEAC's proposals appear to have been pre-determined. The evidence for this assertion is in the Draft Proposals Paper and background documents.

To support its recommendations for National Parks VEAC used a "Socio-Economic Assessment". The main technique used by the Assessment consultants was a "Benefit-Cost Analysis". To answer the question as to the value of red gum forests the Benefit-Cost Analysis was based on a "Choice Modelling" survey carried out by a company called URS Australia Pty Ltd. Diagrammatically, this is expressed as;



On the basis of the Benefit-Cost Analysis (that was based on the Choice Modelling survey), the Socio-economic Assessment concluded VEAC's decision to impose National Parks provides significant environmental benefits.

So, in effect, the VEAC proposals for National Parks rely on the validity of the Choice Modelling survey. The validity of this work will be discussed later but it must also be said that the process contains indications of VEAC dishonesty. That is, the VEAC Scenarios 2, 3 and 4 for National Parks (see Page 77 of the Draft Proposals Paper) appear to have been drafted, discussed and used as part of the Choice Modelling survey carried out in November 2006.

At VEAC's request, between February and 1 June 2007, URS prepared a 76 page report. In Section 8 of this report URS said, "Because of the consultative nature of the VEAC inquiry process, no alternative forest management options have yet been designated". These words are clearly wrong - VEAC appears to have made its decision to propose National Parks in 2006.

Firstly, this report was presented at least a month before VEAC released to the public its draft proposals for National Parks. Secondly, work on the report itself began about eight weeks after the closing date for submissions from VEAC's 2006 Discussion Paper. It is inconceivable this work could occur without early access to VEAC's "draft" proposals.

However, there also seems to be unequivocal evidence that VEAC's 2007 Draft Proposals were available to the consultants in 2006. Table 3.1 in the URS Report, (repeated on Page 78 of the Draft Proposals Paper) includes the VEAC draft proposals. The supporting text in URS Report Section 3.1 makes it quite clear that the 2007 VEAC draft proposals were discussed during questionnaire development in 2006.

"For each of the forest areas, the appropriate ranges over which the attribute levels may vary over 20 years under current management strategies (with no new initiatives), and with options for enhanced management, (underlining added) were determined by (VEAC) staff and experts in the relevant fields".

VEAC will need to explain how, sometime well prior to November 2006, the development of a questionnaire could include draft proposals for National Parks not available to the public until July 2007. If this observation is fact then (a) the VEAC Proposals must have been drafted even before the October 2006 VEAC Discussion Paper was released to the public, (b) the public consultation was dishonest and (c) all submissions were a waste of effort.

If VEAC does not have a credible explanation for these observations it must follow that the community consultation following the VEAC Discussion Paper was a gross deception.

1.3 INCOMPETENCE

VEAC seems to have selectively addressed its Terms of Reference – completely ignoring resource use issues and the “development” aspect of ecological sustainable development. Also, in its own objectives, VEAC declared it would achieve integrated conservation and land management and has failed to address these objectives with reference to grazing.

There is no evidence VEAC addressed several important Terms of Reference. Under its Act, VEAC must take into account the social and economic consequences of its recommendations and must consider any existing or proposed use of environmental or natural resources. Then the Minister for Environment specifically requested VEAC to identify and evaluate the resources and uses of riverine red gum forests and to make recommendations relating to the ecological sustainable use of public land (underlining added).

The Cattlemen's Association notes that VEAC was instructed to consider appropriate access for commercial opportunities (including grazing) and to consider a comprehensive, adequate and representative reserve system. In the opinion of the Cattlemen's Association, VEAC failed to address its Terms of Reference and this amounts to incompetence.

There is also no evidence of VEAC trying to achieve a balance between economic development and biodiversity conservation. The principles of ecologically sustainable development broadly embrace economic development that provides for biodiversity protection, inter-generational equity, and enhanced social welfare.

The Victorian *Commissioner for Environmental Sustainability Act 2003* (quoted by VEAC) clearly aims at (a) enhancing individual and community wellbeing and welfare by following a path of economic development that safeguards the welfare of future generations and (b) providing for equity within and between generations. To achieve its objectives the Act provides “guiding principles” that include (a) integration of economic, environmental, social and equity considerations and (b) development of a strong, growing and diversified economy which can enhance the capacity for environment protection.

The Cattlemen's Association says VEAC has deliberately excluded economic development in its proposals and this, too, amounts to incompetence.

In addition VEAC did not have the competence to address its own declared objectives. In explaining its objectives VEAC said it would be recommending a land use model that incorporates sustainable management in the context of the overall pattern of land use (underlining added). VEAC expanded this theme by saying its recommendations would allow for a wide range of uses and activities under which conservation and land management could be integrated and include (among other stake-holders) farmers. VEAC said its recommendations would reflect consideration of the management demands created by various land use categories.

The Cattlemen's Association says there is no evidence that VEAC even attempted to address its stated objective of achieving integrated conservation and land management and that this, again, amounts to incompetence.

However, the most dramatic indication of VEAC's incompetence is in its use of shoddy science to justify its National Parks proposals. It seems clear that VEAC arrogantly regarded any science as "good enough" or alternately decided no-one would notice the pseudo-science. Either alternative again demonstrates gross incompetence.

As outlined at page 2 above, VEAC in its Draft Proposals Paper relies on a socio-economic assessment using a benefit-cost analysis based on a choice modelling survey. The problem for the Benefit-Cost Analysis, the Socio-economic Assessment and ultimately for the VEAC proposals, is that the Choice Modelling Survey is fundamentally flawed.

Firstly, although there is no mention in any of the documentation as to how many questionnaires were delivered, the Cattlemen's Association is assuming 2000 were delivered to addresses in Bairnsdale, Melbourne, Mildura, Echuca, Wodonga and rural Victoria. Of this 2000, only 52% (1045) were returned.

The second problem with the Survey is that of the 1405 respondents many were confused and simply did not understand what they were doing.

It could reasonably be argued that people responding by placing a value on the future protection of a bird, fish or tree might not understand they are expressing preferences for wider environmental issues – particularly, closing public land for National Parks! It is also true that of the people participating in the "Choice Modelling" survey, many said they were confused. Even the survey consultants found this confusion to be significant.

To try to explain this confusing study: people were asked about their personal preferences for levels of protection for a bird (Superb Parrot), a fish (Murray Cod) and trees (Red Gums). The bird, fish and trees substituted for "biodiversity conservation" and "enhanced management" (National Parks).

The confusion was evident in the fact that just 406 people (out of only 1045 people who filled in the questionnaire) said the survey questions they answered were not confusing. That means only 406 people said they knew what they were doing. Even so, some of these 406 would have only thought they understood the questions and did not really know what they were doing.

This means that the personal preferences of some three or four hundred people (many of whom were residents of Bairnsdale and Melbourne) were used by VEAC to propose closing 100 000 hectares of public land.

The Cattlemen's Association submits these results are simply not valid. If the Choice Modelling survey is not valid the Benefit-cost Analysis and the Socio-economic Assessment are equally flawed. Indeed, the Association says this work is of no value and VEAC's proposals for National Parks are not justified.

If this behaviour is not to be seen as incompetent, VEAC will have to explain why it relied on a confusing research study (and the personal preferences of just a few hundred people) to propose one of the most dramatic changes in land-use in Victoria's history.

RECOMMENDATION ONE

If VEAC cannot provide a satisfactory response to the allegations set out above it should be removed from the River Red Gum Investigation and the Investigation must continue under a neutral more competent authority.

2. BIODIVERSITY CONSERVATION

The Cattlemen's Association accepts the concept of biodiversity conservation and its link to the health of the Barmah ecosystem. However, it is important to note that not all scientists believe biodiversity has a clearly established link to the health of an ecosystem. It is not agreed, for example, that an ecological community is healthier if it has twenty species in it rather than only five. There have been numerous experiments to test this proposition and scientists are opposed in their opinions. Even so, the reason the Cattlemen's Association acknowledges the concept is that the Association supports action to protect species shown to be under threat of extinction.

2.1 AGRICULTURAL AND WILD BIODIVERSITY

The Cattlemen's Association claims there is a place for considering domestic or agricultural biodiversity as well as wild biodiversity and links between the two. The Association says it is nonsense to consider biodiversity conservation in the Barmah ecological community out of a context that includes the history of grazing cattle and also a geographical context - the Barmah Forest is surrounded by agriculture.

As the VEAC itself said, "biodiversity means many things to different people" but it then went on to formulate one of the narrowest possible definitions –

"the natural variety of all life forms: the sum of all our native (underlining added) species of flora and fauna, plants, animals and micro organisms, the genetic variation within them, their habitats, the genes they contain, and the ecosystems of which they are an integral part".

Of course, the Cattlemen's Association acknowledges the harm that introduced species can have on an environment. Farmers (as well as native ecological communities) have suffered from the introduction of species that have become pests. However, the narrow ideologically-based definition excluding all "non-native" species ignores the fact that not all introduced species cause harm to the native ecology.

The Cattlemen's Association claims that many introduced species live in harmony with native populations and that cattle have come to constitute one of these species in the Barmah Forest. The Cattlemen's Association has therefore developed its own definition of biodiversity -

The concept of "biodiversity" must be applied to each specific ecosystem in which all forms of life have, over time, evolved into a reciprocal relationship in which one species does not dominate and mutual survival and support is maintained. When, over time, agricultural animals are shown to fit into a natural ecological community, agricultural biodiversity must be considered along with wild biodiversity and both must be included under the heading of biodiversity conservation.

This definition acknowledges fact that the Barmah Forest cannot be regarded as an island of wild biodiversity with no interaction with the ecological communities on its boundary. The Cattlemen's Association recommends broad consultative action on biodiversity conservation that takes account of wild biodiversity, agricultural biodiversity and the links between them.

The fact is that the Barmah Forest ecological community has been subjected to transformation from the time of human intervention some thousands of years ago. This transformation accelerated when European settlement occurred but after 150 years, cattle have attained a symbiotic place in the Barmah ecological community. The Cattlemen's Association says VEAC should have been aiming to reach a solid understanding of the extent of and causes for loss of wild biodiversity and identify strengths and weaknesses in current strategies for dealing with biodiversity loss. The only rational way to approach the concept is to accept the current ecosystem and adopt an action-research approach to restoring lost or endangered species. A National Park is not the solution and it is notable that VEAC conducted its "Investigation" without testing the concept mentioned above and suggested earlier by the Cattlemen's Association.

RECOMMENDATION TWO

For the Barmah Forest, the definition of biodiversity must be broadened to include both agricultural and wild biodiversity and links between the two.

2.2 MUTUALISM AND BIODIVERSITY

The concept of mutualism is related to biodiversity. The term was coined to describe a mutually beneficial relationship between species in a wild ecological community but the Cattlemen's Association says it applies to the cattle that have been grazing continually in the Barmah Forest for 150 years.

Mutualism is part of a complex ecological interaction that includes predation, parasitism and competition. The Cattlemen's Association maintains that cattle at low grazing levels over wide areas do not have a negative effect on the ecological interactions of parasitism, predation or competition. Rather, there is an exchange of benefits between cattle and other species - mutualism.

Principally cattle provide important nutrition for other species through the breakdown of compounds by digestion and consequent supply of energy but it is also likely that cattle provide protection for native plants and animals. This definition of mutualism is very important for the River Red Gum Investigation.

If it is accepted that a form of mutualism between cattle and other species has existed for 150 years then the link between biodiversity and mutualism is of critical importance to the Investigation. The Cattlemen's Association contends that wild and agricultural biodiversity do not just add to the Barmah ecosystem - they are the Barmah ecosystem. The VEAC investigation should have included the concept of mutualism and considered the interaction between cattle and wild species.

RECOMMENDATION THREE

Alongside a widened definition of biodiversity conservation, the concept of mutualism must be acknowledged as a long-standing mutually beneficial relationship between cattle and other species that enhances the survival, growth and fitness of the whole Barmah ecological community.

3. NATIONAL PARKS

In reading the Draft Proposals Paper, it is difficult to find any serious rationale for VEAC's National Parks proposal for Barmah. There are broad justifications such as, "... there is a growing body of research demonstrating that stock grazing usually (underlining added) has significant impacts on ecological communities ..." (page 22) and "The populations of many threatened flora species are limited by overgrazing ..." (page 74). Later in this submission issues like a reference to "overgrazing" will be discussed but VEAC has produced no evidence whatsoever that a National Park will enhance biodiversity in the Barmah Forest.

3.1 CHANGING THE CLASSIFICATIONS OF THE BARMAH FOREST

Apart from the strong indications that VEAC had developed its proposals for a National Park at Barmah even before calling for public submissions (see page three), the VEAC proposals are made on the flimsiest of foundations. There is no evidence Barmah Forest would be better managed as a National Park.

VEAC should have investigated the weaknesses in the current management regime before proposing such a major land-management change. Further, even if weaknesses can be demonstrated, the Cattlemen's Association says there should be incremental improvements to further protect biodiversity rather than the extreme solution (National Parks) proposed by VEAC.

The fact is both the Barmah State Park and Barmah State Forest are already part of Victoria's Protected Area Network and are already tightly controlled. A National Park will have no proven benefits for biodiversity conservation.

- The Barmah State Park is already managed and categorised by the Victorian Department of Sustainability and Environment under Category VI of the World Conservation Union definition of management of protected areas. The State Park is a managed resource protected area – a protected area managed mainly for the sustainable use of natural ecosystems. Category VI areas are defined as containing predominantly unmodified natural systems, managed to ensure long term protection and maintenance of biological diversity, while providing a sustainable flow of natural products and services to meet community needs.
- The Barmah State Forest is a reserved forest under the Forests Act 1958. Management of the Barmah State Forest is through Forest Management Plans, Regional Forest Agreements and the more strategic recommendations of the Land Conservation Council.

Both the State Park and State Forest principally aim at biodiversity conservation but provide for a wide range of other activity - including grazing.

VEAC has now proposed lifting the Barmah Forest to Category II of the World Conservation Union definition of protected areas. Under this definition activities like grazing would be excluded but limited recreational and visitor activity might be allowed if it is environmentally and culturally compatible.

The Cattlemen's Association does not object in principle to Protected Area Network classifications for the Barmah Forest but it does object to using inadequate justifications for closing public land that has been used for generations without demonstrable harm.

Behind the National Parks proposal is the idea that original biodiversity can be restored by minimising human intervention and excluding all non-indigenous species. This idea has no foundation – in its 2006 submission the Association showed the world-wide management of National Parks is problematic and National parks do not always achieve biodiversity conservation.

Nevertheless, cattlemen are asked to accept, as a matter of faith, that biodiversity conservation will be enhanced if the Barmah Forest is declared a National Park. Radical conservationists frequently say nations with a higher proportion of Protected Area Network parks have lower percentages of threatened wildlife. But Barmah Forest is already a Protected Area Network.

There is no evidence that creating a National Park will enhance its biodiversity - this is conjecture. VEAC should not have accepted, without definitive proof that Barmah as a National Park will do any more for biodiversity conservation than the current management PAN park regime that includes grazing.

Monitoring of biodiversity in world-wide national parks has been attempted but it is hard to know if programs are succeeding. Monitoring is made difficult by the complexity of ecological systems, by different levels of biological diversity and by management objectives that are difficult to measure.

The Cattlemen's Association says a better starting point for monitoring ecological health should be the current regime – take what is known and build on that knowledge through an action research program. Indeed, the Australian National Parks and Wildlife Service has expressed the opinion that a range of protected areas (including reserves for controlled uses), can all be part of a system of managing protected areas to take account of a range of ecological and human-induced changes.

The Cattlemen's Association notes in this opinion, (a) that reserves for controlled uses can be part of biodiversity conservation and (b) that human-induced changes must be included in the management of protected areas. The central fact of the debate about the Barmah Forest is that it is not a pristine wilderness and declaring it a National Park will not make it so.

RECOMMENDATION FOUR

Because a National Park has not been adequately justified, until there is clear evidence for changing the classification levels of the Barmah Forest, the Barmah State Park and the Barmah State Forest should continue to be managed under their current classifications.

3.2 PRECAUTIONARY PRINCIPLE

The precautionary principle is the only possible justification for proposing Barmah Forest as a National Park but there are no scientific grounds for this proposal. One of the guiding principles of the *Commissioner for Environmental Sustainability Act 2003* says that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. It was put to VEAC that this “precautionary principle” should be applied to the Barmah Forest.

The Cattlemen's Association accepts that the precautionary principle can be and has been of value in the face of pending threats of serious irreversible environmental harm - such as a threat of chemical pollution.

Nevertheless, the Association declares the use of the precautionary principle to impose a National Park on the Barmah Forest to be deceitful - simply because no-one has suggested serious or irreversible damage. The Cattlemen's Association says the use of this principle is just an excuse for not conducting research that might show results unacceptable to conservationists.

It must be said that, world-wide, the use of the precautionary principle has been marked by controversy and confusion. Further, it is virtually absent from forestry management because it cannot be demonstrated that urgent action in forests requires precautionary restrictions ahead of scientific certainty.

The Cattlemen's Association says the precautionary principle raises significant equity issues in biodiversity conservation – its impact is negative only for people whose livelihoods depend on using biological resources. In its 2006 submission the cattlemen pointed out that their mountain cattlemen colleagues were probably the victims of the precautionary principle and bore both the burden of proof and also the socio-economic burden.

VEAC appears to have been drawn in to using the precautionary principle without being certain of the existence of imminent danger of serious and irreversible environmental harm. The Cattlemen's Association denies this urgency and says the precautionary principle should be rejected as a strategy. The Association instead recommends a strategy of ongoing action research.

RECOMMENDATION FIVE

There is no evidence of imminent danger of serious and irreversible environmental harm to the Barmah Forest so the Precautionary Principle must be rejected in favour of ongoing action research to ensure biodiversity conservation.

3.3 THREATENED SPECIES

It is deceitful of VEAC to use threatened species as justification for proposing National Parks For example, at page 74 of the Draft Proposals Paper VEAC says "The removal of grazing in Barmah Forest will significantly improve conditions for the endangered Mueller Daisy". VEAC knows (or should know the Muella Daisy is an annual herb that readily regenerates from seed during heavy rainfall and that grazing has no effect on the Muella Daisy.

Secondly VEAC knows that although there are species listed as “threatened” that live in the Barmah Forest, not one bird, animal fish or plant is under threat of serious decline in the Forest. Yet VEAC continues to use the deceptive statement that many species in the Barmah Forest are “threatened”. The Cattlemen’s Association maintains that data concerning threatened species in the Barmah ecological community must be studied very carefully because the data can be misleading.

The first example used by VEAC is the Murray Cod. Traditional Murray Cod habitat is far from being confined to the Murray and while it is listed as “vulnerable” under the Victorian Flora & Fauna Guarantee Act and “threatened” under the Commonwealth Environmental Protection & Biodiversity Conservation Act, its numbers are not declining.

The Murray Cod is a very adaptable fish. Once it was common throughout almost all of the Murray-Darling system. Local, anecdotal evidence is that the Murray Cod is on a comeback after (apparently) learning to cope with the invasive European Carp. Murray Cod is being regularly re-stocked into water reservoirs, rivers and farm dams.

Certainly, Cod numbers are not decreasing in and around the Barmah Forest and creating a National Park at Barmah will not do anything at all about restocking its original range.

It has been claimed that cattle grazing river banks endanger the Cod but this does not apply to the Barmah region and river flow regulation is much more significant. The way to ensure the long-term survival of Murray Cod is to have healthy rivers and more natural flow regimes. To use the Murray Cod as an excuse to create a National Park at Barmah is deceitful.

Similarly, the Superb Parrot is not under threat of serious decline in the Barmah Forest. Much has been made of the so-called threat to the Superb Parrot and VEAC used its “threatened” status to back up its proposals for National Parks over areas in which the Parrot has not and never will nest.

The facts about the Superb Parrot are that it is now mostly found in central woodland areas of Southern New South Wales and the Australian Capital Territory as well as in Victoria. It is under threat from land clearing, loss of hollows, lack of regeneration of woodland habitat but mostly from the spread of the common mynah that competes for the hollows in which the parrot nests.

Although the Superb Parrot is classed as “threatened” on the IUCN Red List, it is in the lowest category “vulnerable” and is five categories down from the most serious category (extinct). There are an estimated 6500 birds in the wild but they are a popular aviary bird and no-one knows how many actually exist.

It is also true that, in Victoria, the bird is now largely confined to the Nathalia area, especially Barmah State Forest but in recent years, the parrot has (albeit rarely) been sighted in Victoria's central and southern areas. Certainly, its habitat at Barmah needs protection but although it has substantially declined in northern Victoria it is not considered in danger of further decline.

VEAC also uses flora species to justify its proposals. However, the fact is that there are no flora species under threat of decline in the Barmah Forest. Claims by VEAC that, "many communities are threatened and some are listed under the *Flora and Fauna Guarantee Act 1988* for protection" are misleading.

To counter this misinformation, the Cattlemen's Association (in its 2006 submission) commented on the flora species VEAC listed as "threatened" and to which cattle could possibly do harm. For example, claims that grazing cattle have affected Moira Grass were authoritatively shown to have been refuted – it is the change in water regime in the Barmah area as a result of river regulation that allowed the Giant Rush to out-compete Moira Grass.

The Cattlemen's Association also noted that a species on the endangered list (the Small Scurf-pea) is rare in New South Wales but in Victoria it is not only common in the Barmah Forest but commonly found in grassland, grazing country and even table drains. Nevertheless, VEAC identifies grazing, falsely, as a major threat to this species.

The Muella Daisy is also listed under the Flora and Fauna Guarantee Act but as an annual herb, the Muella Daisy regenerates from seed during heavy rainfall or receding flood waters and occurs in seasonally inundated depressions. Grazing has no effect on the Muella Daisy. For VEAC to use this plant as an excuse to recommend a National Park at Barmah is ridiculous.

The Barmah Forest cattlemen's Association also says categorically that there are no other fauna species under threat of serious decline in the Barmah Forest. In its 2006 Discussion Paper, VEAC also listed a large number of birds, animals and reptiles that live in the forest. Some (such as endangered water birds) are said to have been further threatened by cattle trampling nests. From direct practical experience, cattlemen say this is not so.

Principal threats to colonially-nesting water birds are alterations to the natural flooding regimes (and the reduction in breeding opportunities) as well as predation by foxes and cats. A change to the water level brings more birds.

Opponents of grazing are taking every opportunity to blame cattle for the decline of species. For example, the population of snakes like the Carpet Python, Hooded Scaly-foot, Bandybandy and the Woodland Pine Snake is unknown. Nevertheless, it is said that grazing (along with predation by foxes and pigs and illegal collecting for trade) has created a potential threat to the Carpet Python. The proposed strategy to protect the (unknown population) is to totally exclude grazing from Carpet Python management areas.

The Cattlemen's Association, in the absence of any evidence to the contrary, says this is not only conjecture but deliberate bias against cattle grazing.

In summary, the Cattlemen's Association has carefully considered the species present in the Barmah Forest and listed as threatened under the *Flora and Fauna Guarantee Act*. The Association asserts that grazing cattle pose no threat to any of these species and argues the presence of cattle is actually assisting the survival of plants and animals in the forest. At this time there is no evidence of any serious decline in the fauna and flora of the Barmah Forest and nor is there any evidence whatsoever that cattle have played any negative part in the biodiversity of the Forest.

RECOMMENDATION SIX

The River Red Gum Investigation must use the current Barmah ecological community as the base-line for future action for maintaining and encouraging biodiversity conservation and there must be a serious longitudinal study of the ecology of the Forest and the effect of human-induced change.

4. MANAGEMENT

In its 2006 submission the Cattlemen's Association specifically recommended involvement of people of indigenous descent in the management of the Barmah Forest. However, VEAC has taken this concept much further. VEAC proposed majority indigenous management of a Barmah National Park. The Cattlemen's Association says this proposal is foolish and insulting to local people who have the only genuine practical knowledge of the Barmah Forest.

The fact is that having an indigenous heritage does not guarantee knowledge of the forest. Indeed, the VEAC proposals envisage capacity building and knowledge development to enable indigenous people to participate in park management. Secondly, there is no obvious link between indigenous heritage, effective management and biodiversity conservation.

The Cattlemen's Association strongly supports the involvement of people with an indigenous descent but questions how local people with life-long experience of the Forest can be disregarded. The Association points out that VEAC spent a great deal of money conducting consultations and focus groups with people with an indigenous descent but not once did VEAC talk to the Association about its management proposals.

Following a world-wide literature search, the Cattlemen's Association found the most useful forest management models are based on community participation. Community participation models work because they address social conflicts and are best able to prioritise ecological sustainability.

The Cattlemen's Association says VEAC should have recognised the trend toward local community involvement in management of public resources. VEAC should have rejected the dated scenario in which public land is in the hands of government agencies and selected (supposedly "expert") interest groups. This scenario is disappearing. In the opinion of the Cattlemen's Association managing the Barmah Forest ecological community by way of "silo-type" departmental responsibilities (with or without indigenous involvement) will guarantee ecological destruction and social disruption.

As the conservation task gets harder, the ability or will of governments to do it alone is shrinking. This, along with the need to build local support for parks, requires partnerships involving the co-operation of other players and participants in reaching conservation goals.

The Cattlemen's Association recommends management by local expertise with central government facilitation. Instead VEAC has proposed an unjustified scheme that will guarantee community division and low standards of biodiversity conservation.

RECOMMENDATION SEVEN

There must be genuine community-based management based on:

- **broad representation of stake-holders;**
- **respect for and involvement of the traditional owners;**
- **co-operative resolution of conflicts over rights and uses;**
- **informed, transparent, participatory decision-making; and,**
- **diverse, well-considered and monitored use of forest resources.**

5. CATTLE GRAZING ON PUBLIC LAND

VEAC has ignored the Cattlemen's Association's previous submission. It falls back on the typical conservationist tactic of claiming scientific knowledge in a highly generalised (and therefore irrefutable) manner. For example at page 22 of the Draft Proposals Paper VEAC said, "... there is a growing body of research demonstrating that stock grazing usually (underlining added) has significant impacts on ecological communities ..." but then excuses its failure to conduct the type of study for which it was commissioned by saying that these studies are "costly, time-consuming and are consequently rarely done".

So VEAC recommends excluding cattle from the Barmah Forest without assessing the impact of grazing on the ecological community.

Further, VEAC obviously failed to consider the Cattlemen's Association's 2006 submission demonstrating wild and agricultural biodiversity can develop a mutually beneficial relationship.

Throughout the world, cattle have been traditionally grazed on public land for many centuries. Increasingly, however, radical conservationists are mounting assaults on traditional grazing practices. In some countries this has resulted in a new class of people - environmental refugees. Although the term has gained more respectability (referring to climate change), in many places people have been reduced to poverty in the name of biodiversity conservation.

The Cattlemen's Association is not claiming its members would be impoverished by the closure of the Barmah Forest but nevertheless, if cattlemen are excluded from their traditional country, cattlemen will join the increasing numbers of people unfairly victimised by environmental activism.

In summary, the arguments in Australia and overseas expressed against grazing of cattle on land targeted for preservation are:

1. Over-grazing;
2. Destruction of native flora;
3. Suppression of native animals;
4. Reduction of biodiversity;
5. Increasing spread of weeds;
6. Insufficient economic return to the government (ie low grazing fees); and,
7. Damage to riparian areas.

5.1 "INTENSIVE" GRAZING

Radical conservationists habitually add the adjective "intensive" to the word grazing. For example, VEAC was told there is considerable scientific evidence that intensive grazing is a major cause of biodiversity loss and VEAC has itself referred to "overgrazing" (underlining added). This perpetuates a myth that grazing cattle is synonymous with over-grazing.

The myth assumes cattlemen do not know or do not care about the effect of over-grazing. The Association acknowledges over-grazing has occurred but better than anyone else, cattlemen know the negative effects of over-grazing.

The Cattlemen's Association supports carefully controlled grazing of the forest - a regime in which cattle are grazed over wide areas in low numbers. In its 2006 submission the Association provided research results to demonstrate the positive effect of moderate grazing.

5.2 GRAZING TRADITION

Obviously, grazing on public land has a long tradition and management practices have evolved over time. Management of grazing in the Barmah, Forest includes the annual Barmah muster – an essential management task that has become an important part of the community heritage of the area. In the past VEAC and conservation groups have downplayed the importance of the Barmah Muster – referring to it dismissively as a minor event that could easily be replaced by another form of cultural celebration.

For example, in the Draft Proposals Paper VEAC spends pages discussing indigenous heritage but at page 72 simply says of the cattlemen's heritage, "the muster yards will no longer have a functional use" and proposes a community use area obviously designed for the use of the aboriginal Dharnya cultural centre.

5.3 GRAZING RELATED TO ON-FARM MANAGEMENT

Grazing also enables surrounding landholders to develop farm management plans that are more flexible and responsive to seasonal variations through the use of external feed sources. Another example of VEAC's lack of consultation (or incompetence?) is that it speaks freely about the economic impacts on cattlemen of removing their right to graze cattle at Barmah but the cattlemen were never consulted. Another economic factor often used to accuse cattlemen who graze cattle on public land is that they somehow get a free ride by using public land for low grazing fees. However, these fees are set independently and reflect the true cost and value of grazing on public land.

5.4 GRAZING AND WEED CONTROL

Grazing has benefits for public land management by providing an extra level of vigilance on public land that limited resources may not otherwise provide. In the experience of cattlemen working in the Barmah Forest, cattle keep the forest reasonably clean so that it is possible to get into areas to spray blackberries and briar roses. Seeds of these pests are carried by birds not cattle - there is no evidence whatsoever of significant seed dispersal of weeds in cattle dung. Grazing has been shown to control some weeds – notably Paterson's Curse.

It has been claimed by opponents of grazing that bushwalkers, scientists and government agencies do more to control weeds than cattlemen and that weed control by cattlemen is ineffective. This is demonstrably false – cattlemen are on the ground regularly to identify and deal with outbreaks of weeds: they patrol the forest on owner's duty weeks and frequently travel through the forest checking cattle, repairing fences and stock yards.

As mentioned above, no plant species have disappeared because of grazing. However in its 2006 submission, the Association quoted a US study in which scientists researching the interdependence of plants and animals found that a moderate level of cattle grazing makes for a more diverse eco-system and can even out the production of individual plant species, preventing any one from dominating. In the Barmah Forest, where cattle have been excluded to protect plants, cattlemen have observed reductions in plant population. Without cattle to graze on the new growth of invasive plants (previously controlled by grazing cattle) invasive species became dominant and displaced other plants. In this case biodiversity is reduced rather than increased.

Even so, the Cattlemen's Association is not saying this means that grazing enhances biodiversity – it simply submits that balanced grazing leads to a balanced ecosystem. The Association says grazing has not had a negative impact on flora in the Barmah Forest. Indeed, the evidence is all in the other direction – after 150 years of grazing, flora in the Forest is in good condition.

5.5 GRAZING AND RIPARIAN AREAS

A link has been claimed between grazing of riparian reserves and a decline in biodiversity and natural values. This may or may not be so but it is not justification for removing cattle from public land. In its 2006 submission the Cattlemen's Association quotes research into strategies for keeping cattle away from sensitive riparian areas. Protection of riparian areas is certainly not an argument for totally excluding cattle.

5.6 GRAZING AND FIRE

Livestock grazing is one appropriate management tool for reducing fuel load and providing protection against wildfires. The Alpine Grazing Taskforce has been frequently quoted as finding that fire severity in the 2003 Alpine fires was not determined by whether an area had been grazed or not. The Cattlemen's Association points to the fact that Alpine areas are quite different to the Barmah Forest and any comparison is misleading. Even so, the Association regards the Alpine Grazing Taskforce report as disreputable. CFA and DSE staff working at Alpine fires have reported intensity of fire was far less where stock grazing occurred than in areas where there was none. However, in reality there is little information about which fuel types contribute to wildfire fuel loads in riverine environments.

RECOMMENDATION EIGHT

Rather than simply excluding cattle from the Barmah Forest, the River Red Gum Investigation must continue but by using the current Barmah ecological community as the starting-point for future action and the Investigation must include:

- **Development of a baseline assessment of the natural and cultural resources in the Barmah Forest;**
- **Determining the health of the Barmah Forest under the current management regime;**
- **Development of restoration and revegetation techniques (if areas are found to be degraded or species found to be under threat);**
- **Development of methodology to be used to monitor grazing activities so cultural and natural resources are conserved; and,**
- **Development of grazing management practices which would promote and be complementary to biodiversity conservation.**

6. SUMMARY

The main point made by this submission is that after 150 years of continuous grazing, cattle have established a mutually beneficial relationship with indigenous species in the Barmah Forest. The Forest is in very good condition and no species are under serious threat within the Forest. Nevertheless, there is a need to focus primarily on biodiversity conservation. The best way to do this is to start with the current situation and incrementally improve management of the Forest. The extreme solution (creating a National Park) is not necessary. Cattle, grazing at low stocking rates over wide areas, will actually enhance biodiversity conservation.

RECOMMENDATIONS

VEAC'S PERFORMANCE

RECOMMENDATION ONE

If VEAC cannot provide a satisfactory response to the allegations set out above it should be removed from the River Red Gum Investigation and the Investigation must continue under a neutral, more competent authority.

BIODIVERSITY

RECOMMENDATION TWO

For the Barmah Forest, the definition of biodiversity must be broadened to include both agricultural and wild biodiversity and links between the two.

RECOMMENDATION THREE

Alongside a widened definition of biodiversity conservation, the concept of mutualism must be acknowledged as a long-standing mutually beneficial relationship between cattle and other species that enhances the survival, growth and fitness of the whole Barmah ecological community.

NATIONAL PARK

RECOMMENDATION FOUR

Because a National Park has not been adequately justified, until there is clear evidence for changing the classification levels of the Barmah Forest, the Barmah State Park and the Barmah State Forest should continue to be managed under their current classifications.

RECOMMENDATION FIVE

There is no evidence of imminent danger of serious and irreversible environmental harm to the Barmah Forest so the Precautionary Principle must be rejected in favour of ongoing action research to ensure biodiversity conservation.

RECOMMENDATION SIX

The River Red Gum Investigation must use the current Barmah ecological community as the base-line for future action for maintaining and encouraging biodiversity conservation and there must be a serious longitudinal study of the ecology of the Forest and the effect of human-induced change.

MANAGEMENT

RECOMMENDATION SEVEN

There must be genuine community-based management based on:

- broad representation of stake-holders;
- respect for and involvement of the traditional owners;
- co-operative resolution of conflicts over rights and uses;
- informed, transparent, participatory decision-making; and,
- diverse, well-considered and monitored use of forest resources.

CATTLE GRAZING

RECOMMENDATION EIGHT

Rather than simply excluding cattle from the Barmah Forest, the River Red Gum Investigation must continue but by using the current Barmah ecological community as the starting-point for future action and the Investigation must include:

- Development of a baseline assessment of the natural and cultural resources in the Barmah Forest;
- Determining the health of the Barmah Forest under the current management regime;
- Development of restoration and revegetation techniques (if areas are found to be degraded or species found to be under threat);
- Development of methodology to be used to monitor grazing activities so cultural and natural resources are conserved; and,
- Development of grazing management practices which would promote and be complementary to biodiversity conservation.

Barmah Forest
Cattlemen's Association
October 2007