

23 September 2022

NSW Department of Planning, Industry and Environment
Attention: Mick Fallon
Project Planner

Dear Mr Fallon and Project Planners,

Re: Objection to Inland Rail Project –Narromine to Narrabri – through Pilliga State Conservation Area and associated Pilliga bushland (forests, woodland and shrublands).

The Australian Plants Society NSW Limited (APS NSW) is a community organisation with over 1500 members across New South Wales. APS NSW strongly advocates for the protection and conservation of our unique natural areas including bushland, waterways and marine areas, and the incredibly diverse flora and fauna that inhabit these areas.

Our members strongly object to the proposed Inland Rail Route, through the Pilliga State Conservation Area and associated bushland areas. We object to the proposed removal of at least 1800 hectares – which is an area equivalent to 3 x 6 km of intact bushland.

This proposal reflects a complete disregard for the protection and conservation of Australia's unique bushland areas. It is in complete opposition to the following:

1. The United Nations Goals for Sustainable Development.

Goal 15 states specifically:

Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.

(United Nations – Department of Economic and Social Affairs – Sustainable Development accessed 29 Sep 2022 <https://sdgs.un.org/goals/goal15>)

2. Australia's Commonwealth Commitment to Biodiversity Protection

The Commonwealth has committed to increase the proportion of our nation managed for biodiversity protection to no less than 30% of all land and seas by 2030 (The Conversation <https://theconversation.com/protecting-30-of-australias-land-and-sea-by-2030-sounds-great-but-its-not-what-it-seems-187435> accessed 22 Sep 2022). This project opposes this goal.

The Project Planners should also address how the project aligns and meets the objectives of *Australia's Biodiversity Conservation Strategy 2010-2030* https://www.planning.vic.gov.au/_data/assets/pdf_file/0021/213717/Background-Documents-Commonwealth-Biodiversity-Conservation-Strategy-2010.pdf

One of the overriding principles of the Strategy (page 18) states:

Knowing that our knowledge is limited, we should apply the precautionary principle while employing adaptive management approaches using new science and practical experience. The precautionary principle is that lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage.

We believe this applies to the impacts and potential threats the project will cause, such as habitat loss, vegetation clearing, soil degradation and adding to the impacts of climate change by removing vegetation.

Specific Concerns

The entirety of the Pilliga Forest, including the State Forests, is of exceptional environmental value. It sits within the Brigalow Belt South (BBS) Bioregion. Only 1% of the bioregion is currently protected in declared conservation reserves or subject to private conservation agreements. This is far below the IUCN target of declaring 17% of each nation's lands as Protected Areas, let alone the recent 30% target announced by the Commonwealth under the *30by30* initiative.

Our organisation has just undertaken a botanical tour in this area, as part of our Australian Native Plants Society Australia Biennial Conference, on which I was the tour botanist. The floristically diverse and beautiful composition of the Pilliga was greatly appreciated by all delegates. This proposal was discussed with utmost concern by many delegates. We visited a fenced patch managed by the Australian Wildlife Conservancy (AWC), for the preservation of flora and fauna.

We find it difficult to believe, that this proposal is in the same patch of woodland where the AWC has set up a fenced conservation reserve to protect native fauna and flora, including the re-introduction of threatened fauna. This would seem ironic at best.

From a review of the available project maps ([N2N EIS – Map Book \(nsw.gov.au\)](#) accessed 22 Sep 2022), some of the plant community types to be removed include:

- Broombush - Wattle very tall shrubland of the Pilliga to Goonoo regions and Brigalow Belt South Bioregion
- Narrow-leaved Ironbark – White Cypress Pine Woodland on slopes and flats in the Pilliga Scrub regions
- Red Gum – Rough-barked Apple +/- teatree sandy creek woodland (wetland) in the Pilliga – Goonoo sandstone forests
- White Bloodwood / Motherumbah – Red ironbark shrubby sandstone hill woodland / open forest, mainly in east Pilliga Forests.
- Pilliga Box / White Cypress Pine – Buloke shrubby woodland in the Brigalow Belt South Bioregion, amongst others.

This reflects the diverse nature of this area in terms of floristics and fauna habitat. **At least one of these communities is associated with a listed threatened ecological community.**

The exceptional conservation status of the integrated estate of the Pilliga Forests is reflected in their declaration as a National Biodiversity Hotspot, one of only two in NSW, and of fifteen across Australia.

The proposed rail route will basically split areas of intact and high-quality native vegetation.

It is our opinion that this project will have the same deleterious impact as the establishment of the Maules Creek Coal Mine in the Leard State Forest, which is located within 50 km of this project. This mine has already impacted and fragmented at least 30% of this forest.

This rail project will also add to the negative impacts that mining activity by Santos Ltd is having in the Pilliga.

We have also reviewed the **ARTC Inland Rail – *Crossing the Pilliga Forest* Information Sheet (current as at July 2022)**

The Information Sheet states:

In the Pilliga Forests, approximately 1791 hectares associated with the Inland Rail Corridor and construction zone will be offset under the NSW Government's Biodiversity Scheme.

We consider it unacceptable to offset areas of vegetation that already have a conservation designation and conservation land-use (or informal-conservation tenure and land-use). In other words, land that would have been conserved and allowed to regenerate, under current legislation constraints and in conjunction with typical land use circumstances.

We do not accept that biodiversity offsets will negate the impacts of loss of flora and fauna and, resulting bushland fragmentation and habitat loss, caused by this project.

Actions

We urge the planners of this environmentally detrimental project to re-design the rail route to take advantage of the large amount of established agriculture land that has already undergone large-scale historical clearing. We strongly advocate that the route be altered, from Narrabri – to the west through areas such as Yarrie Lake, to Cuttabri, using the cleared areas along Gwabegar Rd as much as possible, to strongly reduce clearing of bushland. The route could also be moved further west to use the Castlereagh Highway – which appears to hardly support any intact bushland between Wingadee and Gilgandra.

There is an important opportunity here to demonstrate, at the domestic and international level, that economic necessity and infrastructure, does not have to destroy biodiversity.

We urge you to redesign this project, for the benefit of the environment and biodiversity of NSW, now and for future generations. We do not support any proposal which impacts the Pilliga bushland areas.

We also advocate that an independent auditing and assessment body be established to assess the biodiversity merits of the project, against current NSW and Commonwealth Government objectives for biodiversity and conservation.

We also support the research and arguments made, on environmental grounds, in other submissions by environmental organisations.

Yours Sincerely,

Dan Clarke (B.Sc – Hons)

Conservation Officer, on behalf of the Board of Australian Plants Society – NSW.

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