

Department of Planning, Industry and Environment
By email:

Attention: Mick Fallon

21 September 2022

Dear Sir/ Madam,

NPA submission on the Inland Rail- Narromine to Narrabri SSI-9487

The National Parks Association of NSW (NPA) was formed in 1957 and sixty-five years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. Our strengths include state-wide reach, deep local knowledge and evidence-based approach to conservation advocacy.

We pay our respects to the traditional custodians of the Pilliga and express our gratitude for the opportunity for NPA members to visit their beautiful country over the last six decades.

NPA **strongly opposes** the construction of the Inland Rail through the Pilliga Forests. These forests, the last substantial woodland remnant of the western slopes, are of irreplaceable biodiversity significance. At a time when 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, it is beyond comprehension that this project would destroy so much of a unique woodland ecosystem and degrade the entire Pilliga through habitat fragmentation.

In respect to the current NSW process, the classification of the project as State Significant Infrastructure guarantees project approval. This certainty is reflected in the dismissive tone throughout the Response to Submissions, which glosses over the fact that 90% of submissions are opposed to the route through the Pilliga Forests.

NPA endorses the comments of other environmental organisations about the excessive environmental impacts of the project on woodland habitats and threatened species. The unacceptable nature of those impacts is reflected in the scale of ecosystem and species offsets required for the project.

The following comments concentrate upon NPA's overarching concerns about proposed route, which relate to the irreplaceability of the Pilliga in a bioregion context, and the severe loss of ecological integrity generated by increased fragmentation and reduced connectivity.

The Pilliga in bioregional context

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.

Further exacerbating this situation is the continuing clearance of native vegetation in private land across the bioregion. The Brigalow Belt South is subject to some of the highest levels of land clearance on the continent, which has accelerated under a three-fold increase in clearance since changes to NSW legislation in 2016. Consequently, opportunities to retain high quality native vegetation on private lands are fast disappearing in the BBS. The remaining vegetated public lands, notably the State Forests, are now the only viable option for achieving any form of sustained conservation outcome in the BBS.

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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 fifteen across Australia.

Rather than permitting further destruction of the Pilliga Forest, it is imperative that the State Forest be gazetted as Protected Areas under the *National Parks and Wildlife Act*. The only means of avoiding further species and ecological community extinctions within the BBS bioregion is to protect the Pilliga from logging and inappropriate developments such as the Inland Rail.

In NPA's view the environmental impacts associated with this project are so extreme as to be contrary to Australia's obligations under the Convention for Biological Conservation. Our expectation is that this will result in the Commonwealth refusing approval under the *Environmental Protection and Biodiversity Conservation Act*.

Loss of Ecological Integrity

The Inland Rail effectively bisects the Pilliga Forests. The EIS and Response to Submissions acknowledge that the route was selected to reduce community concerns about private agricultural lands. The claim that this represents a balance between community, economic and environmental costs ignores the severe damage that it being inflicted on the Pilliga Forests and the loss of future options to improve biodiversity outcomes through the management of these forests as an integrated landscape.

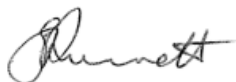
Page 8-3 of the Preferred Infrastructure Amendment Report states that 'conservation of biological diversity and ecological integrity should be a fundamental consideration' in relation to Ecologically Sustainable Development, but then immediately reverts to a discussion of mitigation measures, which largely consist of payments for species and ecosystem credits. Neither the EIS or recent report adequately grapples with the concept of ecological integrity, reducing it to the offset costs of the direct footprint and ignoring the broader impacts ecosystem damage caused by fragmentation, barriers and loss of landscape connectivity.

One of the primary adverse impacts of the proposal is the fragmentation of formerly intact areas of Pilliga woodland communities. The degradation of landscape scale ecosystem processes will result in loss of biodiversity values, greater drying and fire risk and reduced capacity for carbon storage. The proposal has serious repercussions for the integrity, functioning and resilience of the entire Pilliga forest, an irreplaceable National Biodiversity Hotspot.

Approval should not be granted for any route that passes through the Pilliga Forests.

I can be contacted at garyd@npansw.org.au

Yours sincerely,



Gary Dunnett
Chief Executive Officer
National Parks Association of NSW
protecting nature through community action