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Summer Hill Creek, NSW 2800.

7th January 2019.

Submission on the Draft Travelling Stock Reserves (TSR) Plan of Management

Travelling Stock Reserves

Delivering better TSR services for our community

Email: tsr.feedback@lrs.nsw.gov.au

Thank you for this opportunity to comment on the above plan. The Central West Environment Council (CWEC) is an umbrella group consisting of environment and naturalist groups throughout the Central West of NSW and has been following the TSR debate keenly.

General support

On the whole, CWEC is pleased that there will now be some state wide consistency of planning. We appreciate the fact that this document formally recognises that TSRs are important for their public benefit values: biodiversity conservation, landscape connectivity, cultural heritage and recreation. However, they should also be recognised for the educational and scientific importance due to these reserves providing unique examples of remnant habitat in an otherwise cleared agricultural landscape.

We appreciate that 'environment groups' are now recognised as stakeholders in the management and future of TSRs and are pleased that the Aboriginal groups will have a greater say in their management. And we support the need for training and support for staff to manage Travelling Stock Reserves.

Below are some additional comments in relation to specific sections of the draft plan.

Categories and conservation classes.

We note, with relief, that the vast majority of the TSR network (over 99%) in Central and Eastern Division of NSW has been recognised for its multiple values within the Statewide classification

system to be applied. Our organisation has long argued that the TSR network, especially in the Central West has very significant conservation value which should be managed in ways to preserve these values.

However, CWEC has real concerns that some of the TSRs are not in the most appropriate category and would not like to see these set in concrete. CWEC members have not had the time to review all the classes, but it is likely that some areas classed as Category 2 should actually be Category 3 and the opportunity for community groups to have input into the reclassification of areas should be built into this plan (see below).

Local operational plans

We support the concept of local operational plans based on a state wide template, but have concerns re the ‘autonomy for regions to tailor for unique regional requirements’. If this is too broadly interpreted, it could undermine the consistent approach set by this document. Regions should be allowed to review their conservation and management categories (and this should be stipulated in the plan of management), but otherwise stick with template.

If each LLS is doing an annual review of its TSRs and their classifications in its operational plan, as would be strongly recommended, then a statement about input from local environment groups and other stakeholders (ie community consultation) in this process should be included in this document. To enhance accountability and ongoing improvement, the plan should, therefore, detail a process for regular audit/review and preparation of a report back to stakeholders.

CWEC strongly suggests that a statewide review of the actual categories themselves, as we are not convinced that these are underpinned by the Environment Trust conservation assessments and the results of other studies (eg values) undertaken.

TSR Specific Metrics

We have real concerns that environment goals only apply to TSRs that are grant-funded or under conservation agreements. Surely, there should be a basic target that the condition of TSRs does not deteriorate. As the Environment Trust grant provided funds for state-wide assessment of all TSRs under LLS management, then baseline data have already been gathered and could be used to measure performance over the period of the operational plan.

Vision

Similarly all the ‘critical success factors’ relate to actions or capacity, rather than outcomes (eg an arrest to the decline of focal species). It is not at all clear what (under Environmental Goal) this means: ‘more rural landscapes reconstructed around TSRS’. We suggest omitting or rewording this goal.

Funding model

We support the need to source additional revenue to manage TSRs. However, LLS should not be dependent on grant funding or an ‘entrepreneurial approach’. It is critical that the institutional governance arrangements ensure maintenance of ecological and other values of these reserves up front. Volunteers may not be available in areas with a low population and there is real concern that if LLS waits for grants to materialise, management for ecological

values will be under-funded. This is a state government responsibility and adequate state government funding for staff and equipment is critical for these reserves to be managed properly. It should not be expected that the community shoulders this role.

Appendices 1 and 2

We recommend including someone with local knowledge of flora and fauna on the 'expert panel'. We would prefer to see this worded as a community consultative committee.

We support the search for 'alternative funds' to avoid new long term permits, but LLS should not be dependent on this approach as outlined above.

There is considerable concern in relation to long term leases, particularly for Category 2 and 3 Reserves, which constitute by far the majority. Occasional grazing is acceptable and may even be beneficial if used strategically to reduce weed build up, or for specific habitat management purposes, and short term leases should also be considered where appropriate, but long term leases are of concern. Long term grazing, unless at extremely low density, invariably leads to impoverished condition.

Categories 2 (2c) and 3 (3d) should, therefore, be phased out ie these areas should not be subject to long-term grazing, unless it is for strategic purposes as set down under an agreed management plan.

It is noted that Category 2 areas have a conservation significance of medium or high and that Category 3 areas have a conservation significance of high-medium. Are these the same?

Appendix 3

The preparation of the local operational plan should include a stakeholder/community reference group: this should be included in the template. The group should include representatives from the local environment groups, Aboriginal councils, droving groups and others as needed. It would not be satisfactory to rely on the LLS working groups unless these operate a Natural Resources Management group, with representation from local environmental groups. It should be noted that since the Central Tablelands LLS incorporated their NRM group with that of agriculture, most of the people with NRM expertise left.

Conclusion

This draft plan of management is a very good step forward into a state-wide planning approach for TSRs. Some concerns remain, however:

- TSRs should be recognised for the scientific and educational values.
- Classifying TSRs into management and conservation categories needs to be an ongoing commitment by LLS, so environment and other groups have the time to provide input into a review process.
- Goals need to re-worded so that they reflect actual outcomes in desired condition.
- More emphasis should be on formal community consultation at the preparation stage of local operational plans.

- TSR management must not be dependent on grants, entrepreneurship and voluntary labour, but requires a solid income from state government to ensure ecological values are maintained.
- Long-term grazing should be phased out of TSRs of Category 2 and 3.
- Processes for consultation with and reporting back to the community on target achievements should be detailed in this plan.

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7th January 2019.