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Submission by the North East Forest Alliance and the Northern Inland Environment Council to the Senate Inquiry into the operation of the Environment Protection and Biodiversity Conservation Act 1999.

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This is a joint submission by the North East Forest Alliance and the Northern Inland Environment Council. These two environment groups operate in northern NSW – and have detailed knowledge of two of the major terms of reference contained in the review, relating to Regional Forest Agreements in the north-east and Grassy White Box Woodlands conservation in northern inland areas. These two issues are discussed in considerable detail in the body of the submission.

Apart from those two major issues, on which this submission concentrates, other major concerns of the two groups in relation to the EPBC Act 1999 are that:

1. There is a clear, urgent and over-riding need to include a climate change trigger within the EPBC Act 1999. The science is overwhelming and does not need to be repeated here. Action is urgently required to more adequately protect biodiversity in response to climate change.
2. NSW legislation has not been effective in ending land-clearing due to numerous loopholes, enforcement is inadequate, and there is still no basic monitoring to deliver accurate estimates of annual clearing. We understand the situation is similar in Queensland. A land-clearing trigger is urgently needed in the EPBC Act.
3. Forest dieback is an emerging issue across large areas of NSW – Bell Miner Associated Dieback is affecting large areas of north-eastern NSW and spreading rapidly, Rural Tree Decline is widespread in Tableland areas, and drought stress due to reduced flooding is causing dieback of River Red Gum wetlands throughout the Murray-Darling Basin. However, despite this rapid and emerging threat, dieback has no standing in any legislation and there are no systematic resources dedicated to addressing it. Urgent measures need to be put in place to deal with forest dieback under the EPBC Act 1999.
4. The costs, and potential for adverse cost orders, make it incredibly difficult for voluntary community groups such as ourselves to use the standing provisions under the EPBC Act 1999 to enforce environmental provisions.

REGIONAL FOREST AGREEMENTS

We submit that the north-eastern NSW RFA is severely inadequate to protect forest species and forest habitats. As a result, we believe that there should be no exemption under the EPBC Act 1999 for forestry operations in Regional Forest Agreement areas.

The effects and rate of human-induced climate change have increased dramatically since the RFA was signed in 1998. Climate change was not considered at all during the CRA process. Numerous nationally-listed species in north-eastern NSW are threatened by climate change (including species such as the Spotted-tailed Quoll), but the EPBC Act exemption leaves things frozen in time, to 1998 when climate change was not considered.

Climate change will dramatically increase other threats to species in the region, through increased spread of invasive species, increased fire frequency and severity, increased spread of forest dieback, and reduced streamflows. The cumulative impact of all these threats, plus industrial logging operations operating under an exemption to the EPBC Act 1999, will result in a major impact on nationally-listed species. Conditions placed on logging to ameliorate its impacts as a result of the RFA are increasingly inadequate as climate change escalates.

Furthermore:

1. Private lands were not assessed as part of the RFA, but they are being logged with very weak regulation at an alarming rate under an EPBC Act 1999 exemption.
2. The conservation targets of almost all nationally-listed fauna species and many nationally-listed flora species were not achieved through the RFA – substantial additional conservation action is still required to meet minimum benchmarks.
3. The north-eastern NSW RFA has not been properly implemented, review timeframes have not been met and key components have not been conducted.
4. The conditions on logging under NSW legislative regimes, on which the RFA relies to deliver ‘ecologically sustainable management’, are inadequate, frequently breached and very poorly enforced. Third party appeal rights have been removed.
5. The timber volumes committed through the RFA in north-eastern NSW are not sustainable. Demonstrably unsustainable timber volumes have recently been committed for 20 years, and these even extend beyond the term of the RFA.

I will address each point above in detail below.

1. Private lands were not assessed during the RFA process

The exemption under the EPBC Act 1999 relating to Regional Forest Agreements relates to logging operations on both private and public lands. This is a major cause of concern, as private lands were effectively not considered or assessed during the RFA process in north-eastern NSW, except to provide context for the public land reserve decision. It means that logging operations are impacting on matters of National Environmental Significance without any adequate assessment of environmental values or impact whatsoever.

Up until August last year, logging in NSW was an exemption under the Native Vegetation Conservation Act 1997, and the subsequent Native Vegetation Act 2003. It did not require any approval prior to logging – except in the cases where it occurred on State Protected Land, where a development consent was required. Therefore, very substantial areas of native forests were intensively logged, with virtually no constraints, from the signing of the RFA in 2000 to

the introduction of a new Private Native Forests Code of Practice in July 2007. The precise area is unknown, because there was no requirement to even report the extent of logging.

The new Private Native Forests Code of Practice under the Native Vegetation Act 2003 represents very basic regulation. It is inadequate to protect high conservation value habitats, to prevent substantial negative environmental impacts generally, or to prevent negative impacts on nationally listed species. Notably, it is far inferior to the license constraints which apply to logging on public land in north-eastern NSW.

The major failings of the Code of Practice are as follows:

1. It does not require threatened species survey prior to logging – and does not protect habitats unless there is a species record. Given the failure of the RFA to conduct survey on private land and the extreme paucity of data on private lands generally, this means that the prescriptions contained in the Code are barely ever triggered. As a result, threatened species habitats are being logged routinely under the Code of Practice.
2. It does not properly protect oldgrowth forests or riparian areas – half of the mapped area of oldgrowth forest has been made available for logging without any assessment, and the remainder can be made available for logging after a discretionary field test. Riparian protections are grossly inadequate, with most streams triggering only a 5m hard buffer, and only prescribed streams triggering a 20m buffer.
3. It does nothing to protect corridors or promote ecological connectivity – there is no requirement to consider or protect corridors or important areas for ecological connectivity from logging.

A full summary of the failings of the Code of Practice and the associated Regulation is provided at Attachment 1.

Since the Code of Practice was introduced, in just over a year, some 426 Private Native Forestry Property Vegetation Plans have been approved in north-eastern NSW, covering an area of 83,666 hectares of native forests (as of 19th September 2008). This represents a very substantial rate of logging. These Property Vegetation Plans extend for 15 years and exempt landholders from the operation of the NSW Threatened Species Conservation Act 1995.

NEFA holds data on forest attributes in a Geographic Information System, which includes all of the data collected by the NSW Government for the Comprehensive Regional Assessment process. For this submission, we have conducted an analysis of the location of PNF PVPs approved to date against modelled habitat for three nationally endangered species: Spotted-tailed Quoll (*Dasyurus maculatus*), Giant Barred Frog (*Mixophyes iterates*) and Hastings River Mouse (*Pseudomyis*). The modelled habitat layers are the best available data on fauna habitats in north-eastern NSW - they were subject to intensive statistical analysis and expert review during the Comprehensive Regional Assessment process.

The results of our analysis show the area of habitat for the three species over which Property Vegetation Plans for logging have been granted during the last 12 months:

Species	High Quality Habitat	Intermediate Quality Habitat
Hastings River Mouse	1,678	1,578
Spotted-tailed Quoll	1,164	4,209
Giant Barred Frog	1,315	1,860

Therefore, this represents a total area of 11,804 ha of important modelled habitat for three nationally endangered species approved for logging in a single year. Furthermore, the entire activity is completely exempt from the EPBC Act 1999 because there is an RFA in place.

It is notable that the key habitat features that require protection for these species, are very poorly addressed under the PNF Code of Practice. Riparian zones are very poorly protected for frog species, with only a 5m hard buffer on most streams. All unmapped streams (which amount to 30% of all streams) and drainage depressions are available for logging. This will undoubtedly result in severe impacts on species such as the Giant Barred Frog (for which at least a 30m wide riparian logging exclusion zone is required). Both the Hastings River Mouse and the Spotted-tailed Quoll are recognised as being oldgrowth-related species, and the failure of the Code of Practice to fully and properly protect oldgrowth forests means that they are at grave risk from logging on private land in north-eastern NSW.

Other nationally listed species that occur in the forests of north-eastern NSW, that are likely to be similarly affected, include:

- Long-nosed Potoroo
- Large-eared Pied Bat
- Grey-headed Flying Fox
- Swift Parrot
- Regent Honeyeater
- Stuttering Frog
- Fleays Frog
- Black-breasted Button Quail
- Green and Golden Bell Frog
- Heath Frog
- Wallum Sedge Frog
- Peppered Tree Frog
- Giant Burrowing Frog
- Brush-tailed Rock Wallaby
- Broad-headed Snake
- Border Thick-tailed Gecko

The situation is undoubtedly similar for the 80 plus nationally-listed flora species which occur in the region. There is no requirement to survey for them, and very few records, so there is no trigger for any action to protect them. Therefore, they are legally allowed to be damaged with impunity by private logging operations. They are at grave risk from logging, and associated roading and burning regimes, and from the subsequent spread of invasive species.

In addition, there has been no assessment of sustained yield from private forests in north-eastern NSW. There is no requirement in the Code for any assessment of the sustainable timber yield on a block prior to logging. So, even though the definition of ‘private native forestry’ in the Regulation includes a reference to timber being obtained on a sustainable basis, there is absolutely no requirement to assess what timber yields could be harvested sustainably on the block. Therefore, the Code does nothing to stop over-logging or to prevent

blocks being unsustainably logged out and then sold (the ‘log and flog’ approach that the Code was supposed to stop).

There most certainly should not be an exemption from the EPBC Act 1999 for logging operations on private land that make no attempt to be sustainable, operate under grossly inadequate threatened species protection constraints, and that were not even considered as part of the RFA.

2. Inadequacy of RFA conservation outcome for nationally-listed species

In conjunction with south-east Queensland, north-eastern NSW is recognized as being a national biodiversity hotspot and having international significance for the diversity of plants and animals it contains. It provides habitat for more than 20 nationally-listed fauna species and more than 80 nationally-listed flora species, it is important for migratory fauna, and it is a vital stronghold for many species that have declined elsewhere in Australia.

The region, in conjunction with south-east Queensland, is the evolutionary hub of the wet sub-tropics with a high number of endemic species. It is the only region in Australia where four different zoogeographical zones overlap and is one of only two principle centres of biodiversity in Australia for frogs, birds, mammals and insects. It supports 35 endemic vertebrate fauna, and is the distributional stronghold for 37 other species. Some 40% of the regions flora species are considered of conservation concern, and 260 plant species are largely restricted to the region. It is undoubtedly one of Australia’s major refuge areas that will be pivotal in enabling our declining biodiversity to survive into an uncertain future.

The RFA in north-eastern NSW did not meet the requirements of a Comprehensive, Adequate and Representative reserve system. A large number of forest ecosystem and oldgrowth forest targets were not met (see Table 1 and Table 2 of the North-eastern RFA). Furthermore, the results of the RFA were inadequate to protect nationally-listed species.

Using the NSW Government’s own conservation analysis, targets and data produced during the Comprehensive Regional Assessment, it is evident that only one of the 20 nationally-listed forest fauna species met their conservation targets after the RFA and many nationally-listed flora species fell dramatically short of their targets. Substantial additional reservation and conservation action is still required to meet the minimum requirements identified for these species through the CRA process.

For example, four Spotted-tailed Quoll meta-populations were identified during the CRA process, for which targets were set to aim for the protection of approximately 1,000 breeding pairs. However, target achievement was extremely poor, with three populations achieving less than 20% of the area targeted. Only in one population was 50% of the target achieved. The average target achievement across the four populations was only 25%. This is increasingly inadequate, in light of the threat to the Quoll posed by climate change and likely associated increase in fire severity and potential spread of the Cane Toad.

Similarly, the results for the endangered Hastings River Mouse are grossly inadequate to ensure its survival. Despite the high level of risk and high reservation priority of this species, average target achievement across all populations was only 8%, and only 1 of the 8 identified populations achieved more than 15% of the conservation target.

Table 1. Reservation Target Achievement for nationally-listed species in north-eastern NSW (based on targets set during the Comprehensive Regional Assessment process) as per Flint et al 2004

Species	EPBC Status	No. of Pops	No. of Pops that meet targets	Mean % target met
Brush-tailed Rock Wallaby	Vulnerable	5	0	16%
Grey-headed Flying Fox	Vulnerable	4	2	79%
Grey-headed Flying Fox roosts	Vulnerable	2	0	40%
Large-eared pied Bat	Vulnerable	8	1	31%
Spotted-tailed Quoll	Endangered	4	0	25%
Long-nosed Potoroo	Vulnerable	7	0	26%
Hastings River Mouse	Endangered	8	0	8%
Black-breasted Button Button-quail	Vulnerable	1	0	89%
Fleays Frog	Endangered	6	0	3%
Giant Barred Frog	Endangered	12	4	43%
Stuttering Frog	Vulnerable	10	5	73%
Giant Burrowing Frog	Vulnerable	1	1	100%
Wallum Sedge Frog	Vulnerable	3	0	29%
Heath Frog	Vulnerable	1	0	7%
Green and Golden Bell Frog	Vulnerable	6	0	7%
Regent Honeyeater	Endangered	3	0	31%
Swift Parrot	Endangered	3	0	30%
Eastern Bristlebird	Endangered	2	0	75%
Border Thick-tailed Gecko	Vulnerable	4	1	34%
Broad-headed Snake	Vulnerable	2	0	18%
Peppered Tree Frog	Vulnerable	5	2	73%

A similar situation is revealed when looking at conservation target achievement for nationally-listed flora species. Table 3 provides a list of 20 nationally listed species that did not meet their conservation targets under the RFA. Numerous other nationally-listed species that are not included in this table also remain poorly reserved after the RFA process.

Table 3. Conservation target achievement for 20 nationally-listed flora species (based on data and targets from the Comprehensive Regional Assessment process)

Species Name	EPBC Status	Conservation Target Achievement
<i>Acacia courtii</i>	Vulnerable	89%
<i>Boronia granitica</i>	Endangered	65%
<i>Bothriochloa biloba</i>	Vulnerable	11%
<i>Corchorus cunninghamii</i>	Endangered	28%
<i>Cryptostylis hunteriana</i>	Vulnerable	25%
<i>Diuris praecox</i>	Vulnerable	33%
<i>Eucalyptus glaucina</i>	Vulnerable	72%
<i>Eucalyptus nichollii</i>	Vulnerable	44%
<i>Grevillea guthrieana</i>	Endangered	64%
<i>Grevillea masonii</i>	Endangered	0.1%
<i>Grevillea scortechinii</i> ssp <i>sarmentosa</i>	Vulnerable	54%
<i>Hakea fraseri</i>	Vulnerable	38%

Hicksbeachia pinnatifolia	Vulnerable	2%
Ochrosia moorei	Endangered	4%
Prostanthera staurophylla	Vulnerable	32%
Quassia sp Moonee Creek	Endangered	48%
Sarchochilus fitzgeraldii	Vulnerable	23%
Tasmannia glaucifolia	Vulnerable	50%
Tasmannia purpurascens	Vulnerable	91%
Thesium australe	Vulnerable	35%
Tylophora woolsii	Endangered	6%

Clearly, an exemption under the EPBC Act 1999 is not warranted unless the RFA in question thoroughly meets conservation targets for nationally-listed species. If those targets are not met, as is the case in north-eastern NSW, then an exemption under the EPBC Act 1999 is simply legalising a substandard environmental outcome that will severely threaten the survival of nationally-listed species.

3. The North-eastern RFA very poorly implemented and frequently breached

The Regional Forest Agreements have been very poorly implemented and frequently breached. The five-year review required by s40, that was due in 2005, has still not been started. Key milestones and obligations set out in Attachment 5 have not been met, and the annual reporting required by s39 has not occurred in a timely manner (the last available annual report is 2003/2004).

Examples of two key measures that have not been met relate to World Heritage and timber supplies.

In relation to World Heritage, s 27 of the north-eastern RFA states that:

“Parties agree to actively investigate, and jointly participate in the further World Heritage assessment of the relevant Australia-wide themes specified in Section 3.4.2 (Table 17) of the World Heritage Expert Panel report, including any potential contribution from the Upper North East and Lower North East regions.”

However, the World Heritage Expert Panel recommended assessment and nomination of north-eastern NSW as a centre of eucalypt diversity, but no such assessment has ever been undertaken.

In relation to timber supplies, s81 of the RFA states that:

“The volumes in clause 79 are subject to a FRAMES and wood supply review to be completed by 1 December 2006”.

However, this review did not take place, and instead the NSW Government re-negotiated new 20-year wood supply agreements in 2003/2004 without meeting the requirements of the RFA in this regard.

4. Logging regimes are inadequate, frequently breached and poorly enforced

S 36 of RFA relies on the NSW legislative regime controlling logging to deliver ‘ecologically sustainable management’. It states that:

“New South Wales confirms that its Upper North East Region Forest Agreement and Lower North East Region Forest Agreement (NSW, 5 March 1999) and any Integrated Forestry Operations Approvals for all or part of the Upper North East and Lower North East regions are parts of the New South Wales Forest Management System and are means by which New South Wales will implement obligations and undertakings arising from this Agreement.”

However, the conditions on logging under NSW legislative regimes, on which the RFA relies to deliver ‘ecologically sustainable management’, are inadequate, frequently breached and very poorly enforced. Furthermore, those conditions are subject to change, and have been markedly weakened since the RFA was signed. In addition, third party appeal rights have been removed in NSW and there is no avenue for the community to enforce the law directly despite the transparent failure of the NSW Government to enforce it properly itself.

Two examples illustrate this point well. Firstly, in relation to the endangered Hastings River Mouse, the conditions contained in the Integrated Forestry Operations Approval for this species have recently been weakened for certain core areas for the Hasting Rivers Mouse at the behest of the Forests NSW to increase access for logging. Secondly, in relation to the endangered Spotted-tailed Quoll, FNSW were recently found illegally logging a Spotted-tailed Quoll exclusion zone in Forestland State Forest in northern NSW. They admitted the fact, but claimed it was a ‘mistake’. As far as we know there is yet to be any substantive investigation of the matter by DECC. Despite numerous legitimate breaches referred to DECC by the community, there has not been a prosecution for breaches of the Threatened Species Licence for the last five years.

5. The timber volumes committed through the RFA are not sustainable

The outcomes of RFAs in north-eastern NSW are not sustainable, even from a timber perspective. Demonstrably unsustainable timber volumes have recently been committed for 20 years, and these even extend beyond the term of the RFA.

The original volumes committed as an outcome of the regional assessment process was for 270,000 cubic metres of high quality large sawlogs from north-eastern NSW. The FRAMES system used to derive these volumes substantially over-estimated available timber volumes. In a previous comprehensive analysis of all available data on timber supply in north-east NSW conducted by the North East Forest Alliance (Pugh & Flint 1999), it is concluded that as little as 135,000 cubic metres per annum may be deliverable from the region. FNSW themselves on various occasions have stated that the volume of 270,000 cubic metres is simply not available – in 2003 they wrote to the Forestry Board stating that only 190,000 cubic metres could be achieved in north-eastern NSW.

Furthermore, even the FRAMES model indicates that after 2018 there will only be 130,000 cubic metres of timber available from north-eastern NSW. In short, after the 20 year period of the RFA, there will be a dramatic short-fall in timber, because in order to achieve the unsustainable volumes sought for the first 20 years, the system has had to dramatically over-

cut for 20 years and thence result in much decreased volumes available thereafter. This is clearly reflected in the timber model, which shows a volume reduction of almost 50% after 2018.

Notably, in 2003 the NSW Government re-issued timber supply contracts, without conducting the promised timber review, for a further 20 years (thus extending the contracts out to 2023). Therefore, timber supplies have been committed outside the 20 year timeframe of the RFA, without a wood supply review or any required RFA review. They have also been extended out past the point at which timber supplies will drop in 2018.

There should be no exemption for RFA forestry operations which are demonstrably unsustainable, and for which key agreements relating to sustainability reviews have been ignored and wood supply contracts signed outside the timeframe of the RFA.

GRASSY WHITE BOX WOODLAND

The Act has failed to protect Grassy White Box Woodland, two examples is detailed below.

The Tamworth community fought over an application to clear a Grassy White Box Woodland for a housing subdivision in the area adjoining the Tamworth Longyard Golf Course. Adjoining neighbours opposed the development as far as they could, until approval was granted by DEH, after going through the full referral process.

Basically the council was concerned they would have to compensate the developer, because the woodland was zoned for residential development.

The initial flora and fauna impact assessment was done by an Armidale consultancy, who found that the woodland had little value because it was isolated and “unviable”. The community engaged another consultant to look at the site, who found it was viable (it had a mixed age structure) and was connected to open woodland at the back of the golf course.

The Armidale consultant was then requested to submit a referral to DEH, which was assessed and approval was granted, based on the assumption that it was not significant to the region, as GWBW occurred elsewhere in the Tamworth area on council owned land.

That decision was based wholly on council’s statement that similar GWBW occurred elsewhere on council owned land, which could be protected. No assessment of the value of the council owned land was made to determine if the GWBW was of significant value compared to other areas. In fact the majority of the council owned land is very different being on ridge and hillside topography.

The whole decision lacked credibility, and communications with the council gave the impression that they would find a way to get it approved to cover themselves.

Mining is also having a major cumulative impact on GWBW on the north-west slopes. For example, mining approvals under the EPBC Act have caused 169 ha of high quality White Box-Yellow Box-Blakely’s Red Gum Woodland and Derived Native Grassland to be destroyed in the Mudgee region. Another 167ha has just been referred to the EPBC assessment unit for consideration for clearing for another coal mine expansion plan. The 2:1

offsets have been highly inadequate and are in areas already protected from clearing under the Native Vegetation Act 2004.

Other major mining projects were approved more than a decade before the EPBC Act came into being, but are only just commencing operating now on very old approvals. There has been no assessment of the impact of these mines on GWBW, although it is likely to be substantial. An example is the Boggabri Coal Project, which is located in Leard State Forest north-west of Boggabri. It is an open-cut coal mine approved in 1989 based on an EIS conducted in the 1970s. It only commenced operating in 2006, and in 2007, some 300 hectares of woodland was cleared, with a much larger area identified for clearing – the extent of GWBW potentially affected is unknown. Leard State Forest is the largest remnant left on the Liverpool Plains and represents more than 5% of all vegetation left in this highly threatened region.

There is an urgent need to properly assess and consider cumulative impacts on endangered communities such as GWBW – a review of cumulative impacts should be required under the EPBC Act 1999, and cumulative impacts should be considered by the Minister when deciding whether to approve activities under the EPBC Act 1999.

- a. the effectiveness of responses to key threats identified within the EPBC Act, including land-clearing, climate change and invasive species, and potential for future measures to build environmental resilience and facilitate adaptation within a changing climate;

The Act is not doing anything to stop the extinction of GWBW in the North West slopes region, which is rapidly being eliminated by the key threatening process of environmental weed invasion.

Invasive environmental weeds are rapidly destroying some of the best examples of GWBW in the North West Slopes region. The rate of destruction is greater than the combined impacts of development and agricultural clearing, and the areas of highest conservation in TSR's, and vacant crown land are the most under threat.

It needs to be pointed out that the loss of these areas is “permanent” once lost to weeds it stays that way, spraying an invaded area to remove the weeds is not an option. The only option to protect these areas is to stop the invasion early, which is not happening.

Control of these weeds must be made compulsory for land managers, and funds directed strategically to achieve the conservation of the remaining areas of high conservation value.

- b. the effectiveness of Regional Forest Agreements, in protecting forest species and forest habitats where the EPBC Act does not directly apply;
- c. the impacts of other environmental programmes, eg EnviroFund, GreenCorps, Caring for our Country, Environmental Stewardship Programme and Landcare in dealing with the decline and extinction of certain flora and fauna; and

Current environmental programmes are not achieving the conservation of areas of high conservation value GWBW.

Funds have been distributed to trust groups and land managers through NHT and Namoi CMA sources. A recent inspection of areas where these funds have been directed to, at a TSR

called Somerton Gap and two TSR's managed by the Tamworth RLPB found that insufficient is being done to stop the invasion of Coolatai Grass.

An assessment of the Tamworth RLPB reserves and travelling stock routes in 2006 identified and ranked the conservation values of 160 areas managed by the board.

The ten areas of highest conservation value were considered for funding for conservation management agreements by the Namoi CMA. The outcome of negotiations with the Tamworth RLPB was that five areas were agreed to for conservation management agreements, of those five only two areas where GWBW areas, as the rangers of the board were unwilling to allow the other reserves to be managed for conservation. A recent inspection of those areas found no apparent action has been taken to tackle the invasion of Coolatai Grass.

Giving money to others to implement control programmes isn't working. Control would be far more effective if spray contractors tendered for the weed control of specific areas, and contracts drawn up that ensured the desired outcome was achieved.

d. the impact of programme changes and cuts in funding on the decline or extinction of flora and fauna.

Funds are desperately needed to address the decline and local extinction of GWBW caused by environmental weed invasion throughout the north west slopes. All land managers use the excuse that there is insufficient money available to begin to tackle the problem.