



**Submission to
Draft Strategic Action Plan
Willows in the North Central region Victoria June 2008**

This submission builds on previously discussions, workshop presentations, media releases, tours, website information and documentation about willow management by David Holmgren over many years including on-going engagement with NCCMA staff and board members.

Given the nature of the plan it is inevitable that this submission is negative, even damming of the content and intent of the plan.

To balance my negative comments about the plan, I am including the third draft of my **Willow Management for Agricultural Landscapes** as a positive contribution that I would expect would be referenced in the final report. I hope this can help stimulate the NCCMA to accepting and supporting multiple approaches to catchment management issues.

David Holmgren

Comments on the draft plan

I accept that the draft report has been prepared in good faith, building on past actions and precedents by the NCCMA and the wider “catchment management industry” but it hides a defensive aspect trying to protect those established practises against a rising tide of opposition to work on the ground within the catchment community and within scientific and public policy circles

It is clear that the draft plan is based on assumptions, institutional arrangements, government plans and actions that I believe, are, in large measure;

1. Damaging the ecological and hydrological values of our waterways
2. A waste of taxpayers funds
3. Destroying a resource base that in the near future would be of significant economic value

The plan appears to preclude the possibility of willow management although throughout the plan it uses the word “management” as a euphemism for “destruction to the extent possible given the limits of resources and community reaction.”

This abuse of language is nothing short of Orwellian propaganda and discredits the name of the NCCMA in the eyes of many members of the community.

The fact that this use of words is widespread in government departments, researchers and others within the catchment management community does not reduce the damage.

Climate Change and Peak Oil

The draft plan only mentions climate change's likely impact on willow survival as a minor consideration. There is no reflection on the larger issue that using 1760 as an ecological reference point for management objectives is severely challenged to say the least by climate change. There is no mention of the potential fodder value of existing willow stands in a drier climate where local pasture productivity and reliability decline and, more significantly, where availability of irrigated pasture hay may collapse due to major reductions in water allocations in the Murray Darling Basin. Further there is no mention, let alone modelling or reference to any modelling, of greenhouse gas emissions from removal (and revegetation) programs.

I note that the plan makes no mention of the likely implications of Peak Oil, but accept that in this regard, the draft plan is no more negligent than almost all planning documents by all levels of government.

Community Engagement

Having been at two of the three community engagement meetings (Kyneton and Daylesford), the record of the community feedback, is **not** a transparent reporting. In my opinion, the report has been "massaged" to reduce the importance of views contrary to those embodied by the draft plan. For example, to suggest that members of the Daylesford community were "disappointed with removal practices is misleading when many present were clearly outraged at the continuing "vandalism" by the NCCMA.

I note that the plan does include reference to a moratorium on willow removal in the Daylesford area (although that is not defined) and only (it is implied) until the community can be convinced that willow removal is a good idea.

To not list any ecological benefits from willows, suggests no one at the meetings mentioned any. This recording of the community engagement reinforces the impression that there are a few social values of willows that make removal controversial, but that there is no controversy about the ecology and hydrology of willows. This is not the case given my consistent critique of these programs over 15 years and more significantly the research work of Michael Wilson and colleagues concentrated in the North Central catchments.

Research Opportunities

In **Research and Education**, there is tacit admission of our ecological critique but this is recast as "the Daylesford community" having a view about research opportunities. My presentations to the Kyneton and Daylesford community forums is mentioned in the acknowledgments but are not referred to anywhere in the report.

I note that research by Michael Wilson and Kale Sniderman are listed in the references but could not find any reference in the text.

On the other hand in **Action 2 Further Research**, a number of questions that all reflect badly on willow removal are listed for further research without reference to any source for those questions. Again this public document is covering up the access to the sources of already existing research on these subjects.

The suggestion that research projects should focus on one specific issue and not try to encompass many issues reinforces the reductionist paradigm that has taken most

ecological research in this country away from its holistic integrated foundations. I believe this statement is indicative of “damage control” to ensure that any adverse findings on one issue are contained and do not lead to any general questioning of the science that is purported to support willow removal.

Most importantly there is no mention of research and development willow management based on utilisation. While further basic research on willow ecology could be useful, the more urgent need is to facilitate the opportunities for achieving most of the valid objectives of willow management through well designed utilisation techniques. My draft paper is a contribution to this essential and missing aspect of the draft strategy.

Recommendation

I recommend that the NCCMA board think very carefully before it puts its name to this draft strategic action plan unless there are substantial modification because it will lock the authority into an untenable position as changing perceptions about these issues impact on the authority. This impact will come, not only from community reaction, but also from the highest levels of natural resource management in this country that shape the policy and funding frameworks within which the authority must work.

As the unfolding Energy/Climate crisis bites deeper, it is essential that the authority maintains a flexible strategy that facilitates many different approaches rather than holding on to untenable ideology that will be quickly become unworkable and therefore discredited.