

Submission to: The Coastal Integrated Forestry Operations Approval – Review Process.

Under the Auspice of the State Government of New South Wales and
The Commonwealth Government of Australia.

From: Nimbin Environment Centre.

Introduction:

The Nimbin Environment Centre (NEC) is a voice of the people in our Region through our collective efforts to assist and maintain the cohesive elements of our Native Forests, in providing a continuity of life and sustenance within the Forest Ecosystems of NSW and beyond.

Our Communities and NEC have been part of the Historical preservation of the Ancient Remnants of the Gondwanan Landscape, which are the Native Forests of Australia today.

Agreements that have been made through the Integrated Forestry Operations Approvals (IFOAs) have been at best, a last resort position of protection for N.S.W. Forests, areas which were then recognized as being the last vestiges of a once vital Forest System.

To continue to perpetuate the destruction and removal of Native Forests is not only a travesty of Environmental Protection Laws, but, is unconscionably irresponsible. The impacts sustained through Forest Industry practices are contributing significantly to the further degradation of the Forests of NSW and the wider Australian Landscape.

Findings:

The Natural Resources Commission, has been engaged by the NSW Government to “review outstanding settings for the new Coastal IFOA” since “Initial negotiation of the settings to be included in the new IFOA....(between)....the Environmental Protection Authority (EPA) and Forestry Corporation of NSW (FCNSW)....stalled around a set of outstanding settings and issues that remain unresolved.”

Appendix 2 – Terms of Reference

“The NSW Government committed to delivering the objectives (of the IFOA) with both

- No net change to wood supply, and
- No erosion of environmental values (the Commitments).

Reviewing Impacts and risks relating to the Governments commitments

4. Key Points

4.1 Overall the Commission found the commitments in their current form are not mutually achievable.

4.2 FCNSW and EPA...largely used area-based metrics to assess the impact of the proposed settings on net harvest area, which is a proxy for impact on both wood supply and environmental values. However, neither party carried out a systematic nor cumulative assessment of all agreed and proposed settings as an integrated package.”

Differing evaluations have been shown where results vary from loss of wood supply to the reverse which is loss of environmental value, the only common finding being that “the commitments remain mutually unachievable.”

The Commission notes that “it is difficult to progress a more sophisticated quantitative analysis of the impacts of settings within the given review time frame”. Challenges and limitations were addressed by NRC with the result that “while it has some limitations it allowed a practical assessment of all settings within the time frame of this review.”

“However it is noted that the current IFOA approach does not make the desired outcomes explicit, and therefore it is not possible to know if the current protections deliver the assumed environmental benefits.”

Overall the basis of prediction has been and continues to be unreliable, both in terms of estimates of wood availability and also whether in order to achieve wood supply the changes required to do this are not environmentally hazardous.

The Commission is clearly stating that either the Timber Industry is going to require re-structuring (down-sizing), or, it is the Forests that will absorb the impacts with loss of integrity and viability into the future.

This situation overtly reflects the endangered status of the Native Forests of NSW. What is truly of great concern it that the Commission can only recommend incursions into the already dubious protection strategies, to provide the desired outcomes of timber supply to the Government and Forest Industry.

5.4 Applying alternative Approaches

“The following alternative approaches may be considered to meet or limit impact on both commitments:

- Initiate steep slope trial – evaluate the benefits, costs, operational constraints and controls of accessing timber on steep slopes in NSW; cable harvesting on steep slopes occurs in Tasmania
- Adjust boundaries or management – transfer adjacent new or existing permanent exclusions with high conservation values (non commercial value) in the state forest estate into the reserve system; or NSW National Parks and Wildlife Services manage areas of high quality conservation on the state forest estate
- Review threatened ecological community listings – map threatened ecological communities across all tenures to quantify extent, and if required review their listing against the criteria for threatened species
- Active intervention and management – more strategic, active intervention and management may be required to achieve desired outcomes. For example:

- rehabilitating degraded public land with silviculture techniques on all public tenures
- thinning to reduce impacts on water availability, stand vigour and enhancing environmental outcomes
- allowing more dynamic tenure boundaries to adapt to changing climate
- artificially relocating timber tree species to more favourable climates (assisted migration)
- engineering artificial tree hollows
- deploying more drought/disturbance tolerant species or selective species for environmental outcomes (for example, Tallwood species for Koalas)
- reducing losses of trees due to insects and diseases through sanitation harvests.”

While the Commission (to whom the Government is looking for solutions) may be aspiring to fulfill its Terms of Reference, the above recommendations from an Ecological point of view, refuse to acknowledge the nature of our Native Forests which have evolved over eons of time in particular climatic and non-industrial periods of History.

The only way to ensure a stable Native Forrester environment into the future is for the Forest Industry to recognize that their time is up with logging of Native Forests. The writing has been on the wall for many years and it has been to its own detriment that the Industry has refused to acknowledge the finiteness of the of the activities in which they have been engaging.

Another strategy which the Commission recommends is the monitoring of the above strategies to evaluate their impacts.

“Currently, evaluation of the performance and effectiveness of the existing IFOAs is limited by the existing monitoring arrangements. The Commission has also observed that despite some progress via the IFOA trial, there is a limited evidence base to inform Coastal IFOA decision making. As a result, new settings are being developed based on old assumptions and existing practices, with limited information about outcomes or past performance.”

Again the time for monitoring and trials is well past. Once the trees are gone, they’re gone and it’s too late to reflect on “best practice”.

The Native Forests of Australia remain as the last vestiges of the once expansive Forests of the Coastal Country, and as such are vital to continued life as we know it now in NSW and indeed in connection with all the Ecosystems of this Ancient Continent.

Already we have seen rapid changes that have seen an increase in localised drier conditions in many parts of NSW, from the Rainforest Country of the North to the Temperate Forests in the South. These areas are already at a critical level of compromise, at which any further incursions will only exacerbate an already vulnerable Biosphere.

Flooding rains quickly dispersed through heavily silted rivers and waterways, vegetation depletion, compacted soils and high levels of irrigation, leave little residual moisture in the landscape. Many areas are recording temperature changes and regular rainfall reduction that are increasing vulnerability to bush-fire incidence, changes and limitations to historical land-based productivity and viability within the Rural Landscape.

Added to surface impacts is the depletion of underground water reserves which have been historically largely ignored and little understood in resultant impacts of de-pressurising saturated sub-surface systems.

Conclusion:

Nimbin Environment Centre continues to work with other Local, State and National Environmentalists to contribute to the raising of awareness within Government and the Australian People, of the importance of understanding the Ecological World in which we live. For too long Australia has been treated as a resource-base which is there for the taking. Our Native Forests are much more than a commodity.

Members of NEC have attended IFOA Review Meetings and have called for the cessation of Native Forest Logging in NSW. This has been dismissed out-of-hand by Government Representatives at the Meeting who have no cause to be defining Policy on behalf of the Government. Their job is to take the Information and Concerns expressed by the Public back to the Government. Just as it is the job of this Review to consider all aspects of this Submission.

Change is challenging but achievable where recognition of the need for that innovation is affirmed. There is the will and the expertise amongst the Australian people to work together through the challenges that would arise out of a re-structuring of the Timber Industry and its' current practices.

There are also many aspects of the Natural World where uncertainty lies. The one Element that continues to prove integral to at least having a chance of riding out the waves of change, is that of Core Stability. Our Native Forests are part of this Elemental Environmental Structure that are a vital link to maintaining stability within a changing world.

Time is an important factor in this Review Process. The NRC has pointed out the limitations of assessment and evaluation within the current time-frame. Decisions made in this manner are ill-advised and lack real judgment. It has been hundreds and thousands of years that have shaped the Forests we still have intact today, yet only less than half-an-hour to destroy each individual part of our collective Heritage.

Nimbin Environment Centre adds its voice to the call to the State and Federal Governments to

STOP NATIVE FOREST LOGGING!!

References: Advice on Coastal Integrated Forestry Operations Approval Remake. Natural Resources Commission November 2016.

