

From: [REDACTED]
Sent: Thursday, 8 February 2018 4:44 PM
To: EPA RSD Forestry Strategic Regulation and Reform Mailbox
Subject: Feedback about logging for woodchips in our native forests
Attachments: EPAcover_sheet 2018-02-08 Forestry Submission.docx; sustainable.jpg; Brown Mountain after logging.jpg

Dear Environment Protection Authority,

The damage done to the environment from logging over the past 14 years is extensive and definitely not sustainable forestry.

To give feedback, I would like to address, that the second and third 5 yearly Review of the implementation of the three NSW RFAs covering the period July 2004 – June 2014 is inadequate reporting data.

It is essentially a compilation of data on logging regimes and associated issues and the extent to which various targets have been met. It deals solely with past events and states that it will not consider comment on alternatives to native forest logging.

The review's progress report frequently addresses indicators without providing any data. For example, no spatial data is provided to assess the change in forest growth stage over the life of the RFAs, no data is provided to assess the proportion of each forest ecosystem protected or impacts on species and no data is provided on the value of forest-based services.

The progress report for the RFA review fails to provide any data to support the assertions that logging is conforming to environmentally sustainable forest management. In contrast, there is lots of evidence that forest wildlife is in decline, we know logging reduces carbon stores and water supplies and we know the majority of people support protecting forests.

Failure to comply with reporting requirements would result in devastating loss of native trees, animal habitat and increased Climate Change. The transition to plantation forestry is essential.

The NSW Regional Forest Agreements Implementation Report 2004–2014 provides an overwhelming case for transition out of native forest logging to plantations. Plantations were not part of the first RFAs and yet perhaps 70% of the Implementation Report is about plantations, including virtually all of the positive material.

During the 10 years of the Environment Protection Authority's review (2004-2014) period, over 4,000 non-compliances with Environment Protection and Threatened Species Legislation were identified through EPA audits and investigations.

However, the EPA conducted only 187 audits for approximately 5,000 to 6,000 logging operations. None of this is mentioned in the review upon which the public has been asked to comment. Source: [EPA's ANNUAL REPORTS](#).

Also more critical data is missing from the Report. **Threatened species** missing for Eden RFA area from lists in Table 67: Threatened species list – fauna (p. 295), include, Glossy black cockatoo, Barking owl, Olive whistler, Yellow-bellied Glider, Squirrel glider, Pink robin and White-footed Dunnart. Thus content of the report is untrustworthy at least.

The number of threatened forest species has continued to rise during the RFAs, with iconic species like koalas and gliders now either absent or experiencing population crashes in many parts of NSW. Logging is identified as a key

threat to many forest species, often because of the impact logging has on key habitat features like hollow-bearing trees.

Logging kills forest animals and is therefore an important animal welfare issue.

The State Forests are exempt from the provisions of the Environment Protection and Biodiversity Conservation Act. Given that it takes 100 to 200 years for habitat hollows to form in trees, the term 'sustainable logging' has contradictory connotations.

Climate change was not adequately considered as part of the RFAs, but is now the largest social, economic and environmental challenge we face. It is reckless to continue logging when we know it reduces carbon stores of forests.

Carbon sequestration is considered in Criterion 5 Maintenance of forest contribution to global carbon cycles where they initially give national data then combined native forest and plantation data for NSW showing 4.2 megatonnes sequestered in the year ended 30 June 2014 - FC data. The EPA's following quote doesn't even mention **carbon loss** through woodchips for paper when over 90% of the Eden and Southern logs go to woodchips.

"Sustainably managed forests play an important role in mitigating climate change by taking carbon out of the atmosphere and storing it as wood. Forests also produce timber, a natural and renewable resource that itself stores carbon for the life of wood products. Taking into account the energy required to transform raw materials into building products, timber has a smaller carbon footprint than concrete and steel, other popular building materials."

In the short to medium term, ending logging in the forests of the southern forest region would result in between 1.2 and 1.5 million tonnes of avoided emissions per year. At a conservative price for carbon of \$10 per tonne, there may be the potential for these public forests of south east NSW to earn about \$20 million per annum to fund new infrastructure and jobs. *Logging or carbon credits*, The Australia Institute, 2013.

Cost to taxpayers, the economy and the environment

The NSW **taxpayer** has paid millions of dollars to a multi-national corporation to buy-back non-existent timber because of over-estimated timber volumes by Forestry Corporation. This is one of a series of subsidies that the logging industry receives.

We know that the value of carbon, water and tourism from forests is much greater than timber, and that protected areas are important for the economy. The Government must assess these trade-offs as part of a genuine review.

- The predominant logging for **woodchips** in south east NSW is a long-term contested practice, creates social discord, environmental and financial loss and disrespects Aboriginal culture.
- Combined, Agriculture, Forestry and Fishing is only the 9th employer in the region and forestry jobs are a small proportion of that total, becoming less and less, replaced by machinery. Between 30 and 40 people are employed at the Eden chipmill and fewer than 100 in total forestry operations.
- Less than 10% of logs are milled for sawlogs. More than 90% of native trees logged in these regions goes to the chipmill and are exported to Asia at a **loss to taxpayers** of \$79 million over the past 7 years and at the **expense of the environment** and iconic species.
- The logging industry is one of the most mechanised and most dangerous. The number of direct jobs in the industry has steadily declined and is now estimated as under 400 across NSW.
- Existing mature plantations provide our domestic and export timber needs.

Sincerely

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?Think before you print:

1 reem paper = 6% of a tree and 5.4kg of CO2 in the atmosphere; 3 sheets of A4 paper = 1 litre of water



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