

The report shows a total disregard for the legal framework in which native forest logging is carried out. Most of it is either irrelevant (eg; extensive inclusion of information about plantations) or wrong and provides resounding evidence that the only realistic approach now is to end native forest logging in a fair and orderly way.

For the south coast of NSW (Eden and Southern), the first round of RFAs have given us almost 20 years of the most intensive native forest logging in NSW, record woodchip exports, more threatened species and a growing financial burden on NSW taxpayers.

To use this report as a justification for renewing them indefinitely with weaker environmental controls is outrageous.

### Background

1. The first Regional Forest Agreements date from the era of the chainsaw. Within a few short years, we were in the era of the mechanical harvester<sup>[1]</sup>. Now, it's predicted that robots will soon take on the dangerous and often remote work of logging native forests.

This is no time to be watering down environmental protections and weakening compliance.

2. 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.
3. Few now doubt that the industry is living on borrowed time. Governments can legislate for anything they like (eternal life?) but that doesn't make it real. To legislate for sustainable and economically viable native forest logging, especially for woodchips denies reality.

### Recommendations

The report makes it clear that there is an urgent need for a clear and workable plan to manage the closure of the woodchipping industry. When the time inevitably comes, woodchippers must not simply walk away from the environmental destruction they have caused or their obligations to workers and local communities as so many mining companies have done in the past.

Some obvious measures would include, but not be limited to:

- a. A remediation bond payable by the owners of the Eden woodchip mill to cover costs of restoring the chipmill site for other purposes once the chipmill closes.
- b. A levy on the Forestry Corporation per hectare logged to provide for the restoration of native forests logged between now and the closure of the native forest industry.
- c. A water quality levy imposed on all logging operations undertaken in estuary catchments such as Wonboyn and river catchments.
- d. A road maintenance fee to ensure that roads used by log trucks cease to be a financial burden on other road users, councils and taxpayers until logging ends.
- e. A retraining fund payable by industry employers to entitle all workers currently employed in the logging industry to a retraining package to acquire new skills.
- f. A fire control levy payable by the industry to the Rural Fire Service per hectare logged, in recognition of the fact that dense regrowth forests are more fire prone than mature unlogged forests.
- g. Twofold Bay seabed damage prevention and remediation levy on woodchip carriers using loading facilities at the chipmill, in compensation for degradation of habitat of species such as the weedy sea dragon and green sea turtle by woodchip carriers.

- h. If any RFAs are renewed, Wood Supply Agreements should be for realistic timeframes (no more than 5 years), should not contain “take or pay” clauses and not carry unwarranted penalties for any early cessation of access to wood supply.

## Attachment

Comments on NSW Regional Forest Agreements Implementation Report 2004–2014,

1. Eden S.68, p. 202. This reveals that there was no obligation under the Eden Regional Forest Agreement to guarantee timber supplies from elsewhere when the Murrah Flora Reserve was created. The highly contentious clause in the other NSW RFAs: “Enhancements to the CAR Reserve System will not impede State Forest land management or delivery of wood supply”<sup>[1]</sup> does not apply in the Eden RFA Region, so cannot be used to justify spending the \$2.503 million Environment Trust grant on allegedly sourcing alternative log supplies from further afield. Growing evidence seems to suggest that the ET grant was more about enhancing the bottom line of the Forestry Corporation than serving an environmental purpose. **This type of funding should not be renewed when the current grant expires at the end of 2018.**
2. Contributions to Tourism. The Table on p.228 gives estimates for claimed visitor numbers and financial benefits to regions. Among the facilities cited is the Bodalla rest area, which, it is claimed, attracts 8,000 visitors per year and puts \$1 million into the local community. Really? I would love to know how this figure was arrived at! Even if these amazing figures were true, there is no mention of the tens of millions of dollars from the Community Service Obligation that has helped maintain them. And what impact did it have when the adjoining area was logged?
3. Regeneration. S. 46, p. 162 seems to be suggesting that only about 70% of logged forest (integrated harvesting) regenerates successfully. This is consistent with other information that logged forest, particularly on the cold climate of the escarpment has not regenerated. This makes nonsense of any claim that native forest logging is “sustainable.”
4. The list of threatened species (fauna) for the Eden Region was missing quite a few species. **Table 67: Threatened species list – fauna (p.295)**
  - Glossy black cockatoo
  - Barking owl
  - Olive whistler
  - Yellow-bellied Glider
  - Squirrel glider
  - Pink robin
  - White-footed Dunnart

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<sup>[1]</sup> NSW Regional Forest Agreements Implementation Report 2004–2014, page 202