

**From:** David Gallan <campaigns@good.do>  
**Sent:** Thursday, 22 February 2018 12:37 PM  
**To:** EPA RSD Forestry Strategic Regulation and Reform Mailbox  
**Cc:** forests@industry.nsw.gov.au  
**Subject:** RFA review submission

Last century the RFAs in our state began. Even then, there were reports from the Auditor-General indicating that our forests were being cut down faster than they are growing. In our local community the scores log trucks that we see daily feeding the mountain of chips at the Eden mill just reaffirms what the Auditor-General stated.

The Bega District News ran a headline in response, "INDUSTRY HAS ITSELF TO BLAME".

This just underlines how extractive industries in this country are exploitative and don't acknowledge the true value of the products they have plundered in the past until, in some sectors, they ran out (ie. red cedar and whales.)

The fact that the reporting regime for the RFAs were never followed tells you the responsibilities of the industry were never taken seriously and adds to the thesis that the logging just benefits a few contractors while the public bears the cost and the forests, the damage.

In the thousands of pages of this report there are no mention of the hundreds of breaches of logging guidelines and the lack of monitoring by EPA due to chronic understaffing. There is no clear mention of the number of hardwood forest jobs. The whole report and process of review is deceptive and misleading. Those points are beyond debate. The review states in the introduction that it is supposed to be comprehensive. The next sentence indicates that the report will shape the new RFA. The state and federal governments decided last year to renew the RFAs before the review began. That is a totally unreasonable decision making process.

We hear that the RFAs are all about jobs but jobs have been disappearing due to commercial realities of the export market, namely, we can't compete with SE Asian hybrid plantation product. Prices have fallen. Mechanical harvesters now can clear hectares of forest each day with only a crew of three. There haven't been gangs of chainsaw workers on the ground for years.

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.

The fact that the Auditor-General has values Forestry Corporation at \$0 tells us a lot.

Australia's carbon emissions are increasing, threatening the health of our community. We know that trees provide the most effective form of carbon capture and storage, yet the RFAs continue to allow the logging of NSW's public native forests.

RFAs mean that the public native forest logging industry does not have to comply with the usual Commonwealth environment laws. While every other industry must comply with these laws, logging in habitat for federally listed threatened species occurs routinely because it's accredited through RFAs.

When attending several public meetings people are alarmed at this fact. They put their trust in government departments to do no harm. To protect our natural heritage. But the Forestry Corporation does not seem to act as a normal public service.

If someone is harmed or dies in the public hospital system people are accountable. A health representative fronts the media, admits that mistakes were made and corporately measures are taken to prevent accidents or sloppy procedures happening in the future. The Forestry Corporation seems more like a logging broker than a guardian of the forests. If they're found in breach of the guidelines they shrug it off. If they lose a court case they say they won.

All of this is compounded by the fact that NSW is the only state where individuals cannot take the FC to court to account for breaches. Underfunding of the Environmental Defenders Office and only half a dozen EPA officers to patrol the whole state virtually gives a free licence for contractors to do as they please despite all the beautifully drawn maps with threatened species exclusions.

Existing FC cut backs limit fauna surveys to a nearly useless level and leaked cabinet documents by the ABC in 2017 indicate possible slashing of pre-logging surveys in the future and the halving of stream bed reserves. If these sort of things were happening or planned for in Brazil people would shake their heads and say, "What do you expect?"

Well we, the people of NSW and Australia, charged with a special responsibility to protect our unique wildlife expect much better.

For thirty years we have seen that the regrowth rates in the south east have been overestimated (as they were in some commercial plantations such as Timbercorp also run by professional foresters). The forest species distribution in the regrowth was not the same before areas were logged. We all know that silvertop ash grew back far more vigorously than other species. Contractors have admitted to me that the sawlog supply was overestimated at the time the RFAs were drawn up.

RFAs were initially developed as a model to facilitate multiple uses of public native forests, including timber extraction and conservation, and to underpin in a stable forestry industry. They have failed to meet these aims as the following facts attest:

Populations of forest animals – including koalas – have plummeted over the life of RFAs; Ecosystem processes in forests, like the carbon and water cycles, have been disrupted; Hollow-bearing trees, key to the survival of wildlife, have been reduced by logging; Ecologically Sustainable Forest Management has not occurred; Forestry job numbers have steadily declined, and subsidies keep logging financially viable; The NSW taxpayer has repeatedly footed the bill to buy out logging contracts.

I am concerned that the current process is not a genuine review of the performance of RFAs and whether they have met their aims. If it were genuine, the Berejiklian and Turnbull governments would not have already committed to their extension. The overdue progress report on the second and third five-yearly reviews fails to provide adequate data for the public, NSW and Commonwealth governments to assess the performance of the RFAs. It also fails to take account of new knowledge, particularly on climate change and its increasing threat to ecological systems, biodiversity and human wellbeing – social, health, mental, and economic.

Public native forest logging is unsustainable. It is time that our state forests, the property of the citizens of NSW, were managed in the best interests of the public. Proposals like the National Parks Association NSW's (NPA) Forests For All seeks to protect all public forests and increase public access for recreation, nature-based tourism, health and well-being and education. This proposal is supported by several health and education organisations.

In light of these comments, I recommend that the NSW and Commonwealth governments:

1. Not renew RFAs because they are a failed model for forest management;
2. Heed the accumulated evidence and use the expiry of the RFAs to trigger a just transition of workers out of the native forest logging industry; and
3. Protect public native forests to ensure our wildlife, water and carbon stores is safeguarded for future generations by implementing strategies like Great Southern Forests and NPA's Great Koala National Park and Forests For All plan.

RFAs were a well-intended effort to reconcile logging and conservation. Given the accumulated evidence that they haven't worked, rolling over the RFAs will constitute a decision to entirely favour the logging industry over the public interest. This will prolong conflict and hasten the demise of threatened species. I urge you not to take this path.

I confirm that my submission does not contain sensitive information and can be published in full on the Environment Protection Authority and/or the Department of Primary Industries website.

I understand that the Environment Protection Authority, Department of Primary Industries and/or the independent reviewer may contact me about my submission.

Yours sincerely, David Gallan New South Wales, [REDACTED]

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