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NSW Regional Forest Agreements
Forestry Branch
Environment Protection Authority
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By email to: forestry.policy@epa.nsw.gov.au

14 February 2018

To whom it may concern,

New South Wales Regional Forest Agreement Review Submissions

Humane Society International (HSI) is a not-for-profit organisation concerned with the protection and conservation of wildlife and biodiversity. HSI seeks to create an ecologically sustainable and humane world for all animals and their environments. We have more than 24 years' experience in promoting the enhancement and protection of all animals and their habitats. We work actively to assist government bodies and agencies to further the protection of animals and the environment through appropriate regulations and enforcement. HSI is also a founding member of the Places You Love alliance, which advocates for the protection of Australia's most iconic reefs, forests, wetlands and wildlife from development.

On behalf of our 70,000 supporters, we make the following submissions in response to the review of the NSW Regional Forest Agreements (RFAs), specifically to **oppose the continuation of the RFAs** which begin to renew from 2019.

The RFAs in their current iteration are both outdated and demonstrably ill equipped to preserve public native forests. The RFAs have systematically failed to successfully protect the environment, and therefore require substantial improvement. They should not be rolled over without significant amendments that bring them into line with today's environmental context and address the significant failings of the RFAs as they presently exist.

There are a number of reasons why these agreements have been unsuccessful and will continue to fail to meet objectives if they are extended. HSI submits that the NSW RFAs are not fit to be renewed for the following reasons:

1. The RFAs have failed

There is no data to show that the RFAs have resulted in Ecologically Sustainable Forest Management, nor any evidence that they have fostered a stable and economically viable timber industry. Furthermore, the CAR Reserve Network remains undelivered.

2. The RFAs are outdated

The RFAs fail to encompass modern environmental perspectives, international environmental standards, and do not make any consideration for climate change. It is widely accepted that logging reduces forest carbon stores and therefore an absence of climate change considerations is a huge oversight.

3. The RFA review process is inadequate

Data to support conclusions on indicators addressed in review progress reports is notably absent. Examples of this are lack of data assessing forest stage growth, proportion of forests that are protected, impact of RFAs on species, or the value of non-timber based forest services. The reviews are also not conducted in a timely manner, rendering them impotent.

4. The RFAs overlook forest value beyond wood and logging

The RFAs only value forests on their logging potential, and fail to account for the value of other assets such as water, carbon, ecosystem services, and tourism.

5. The RFAs exacerbate threatened species and ecosystem risks

To date, the conservation status of many species has only declined since the introduction of the RFAs due to habitat destruction. This includes iconic species such as Koalas and Gliders. Logging is also directly responsible for the death of forest animals which is a significant animal welfare concern.

6. The RFAs prevent public oversight

Under the RFAs, third parties are prevented from taking action in logging breaches leading to a lack of transparency and industry interests undermining public interest.

7. The RFAs prevent Commonwealth oversight

Accreditation of logging operations under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* has resulted in lower protection for forest species.

In light of these failings, we submit that as an absolute minimum, future RFAs would need to encompass the following improvements:

1. Enforcement of Federal environmental legislation within the logging industry;
2. Alignment with international environmental standards, treaties and agreements;
3. Improvement and enforcement of prescriptions pertaining to threatened species;
4. Improvement and enforcement of prescriptions pertaining to Climate Change;

5. Improvement and enforcement of prescriptions pertaining to non-wood forest values such as water, carbon, ecosystem services, and tourism;
6. A more comprehensive and timely review system that allows critical performance analysis and a mechanism for incorporation of improvements. Ideally this would involve scientific analysis by an independent body, not just consultation with involved government agencies;
7. Shorter agreement durations that allow for frequent and timely adjustments, especially given the potential medium to long term impacts of climate change;
8. Substantial additions to the formal reserve system.

HSI submits that given their pervasive flaws, the NSW RFAs **should not be renewed**, as the NSW Government has **already agreed to do before the finalisation of this consultation process**. The RFAs should be discarded in their entirety and replaced with agreements that ensure our natural assets are protected, and provide support for a shift away from the native forestry industry. These agreements need to be aligned with internationally agreed standards, current science, and encourage a transition toward sustainable native forest management.

Please forward any correspondence in relation to these submissions by email to [REDACTED] I can be contacted anytime on [REDACTED] or at the email address noted above.

Yours sincerely,

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Nicola Beynon
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Humane Society International