

## **Submission on RFA reviews and Renewal**

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**Jim Morrison 23/02/18**

The recent consultation process regarding the renewal of the RFAs has been a sham because it is apparent that the RFA renewals have been predetermined by Governments and industry, irrespective of what the majority of the community desire and despite the fact that few if any of the promised outcomes of the last RFA have been genuinely met.

It is apparent that the current process is not a genuine review of the performance of RFAs and whether they have met their aims. 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, for example on Bell Miner Associated Dieback and particularly on climate change and its increasing threat to ecological systems, biodiversity and human wellbeing.

The five, ten and fifteen year reviews have each been so delayed, lacking rigor, transparency and independence as to make them meaningless. The document outlining the second and third five yearly reviews on the EPA website is overly long winded, complicated, and difficult to read, understand and believe. It perpetuates the lie that all is well with our public native forest management when nothing could be further from the truth.

In contrast to the EPAs review documents, the NSW National Parks Associations review of the RFAs,( Sweeney ,O.F ,2016, Regional Forest Agreements, Have they achieved their aims? National Parks Association, Sydney) provides an objective, believable overview on the current RFAs, highlighting their failure to meet almost all of their key objectives.

The RFA renewal facilitates 'the NSW Forest Industry Roadmap,' for which there was no community consultation and no social licence to implement. Recent independent polling in Lismore and Ballina Shires indicates overwhelming(>90%) support for an end to native forest logging on public lands and a rapid transition into a plantation based industry, yet there is no indication that this has even been considered by the current State or Federal Governments. Rather than reduce conflicts over public forest management, RFA renewals, which have little genuine community support, will only serve to facilitate ongoing, active community opposition to ongoing forest destruction facilitated by the RFAs.

The completion of the last twenty year Regional Forest Agreements provides an important opportunity to end the destruction of what remains of our public native forest resource and engage on much needed regional scale native forest restoration.

The RFAs have failed to demonstrate genuine Ecologically Sustainable Forest Management .This is clearly evidenced by the large and increasing area of Bell Miner Associated Dieback (BMAD) over many areas of moist coastal eucalypt forests which have been subject to unmitigated logging disturbance.

The mention of BMAD under Criteria 3 Maintenance of ecosystem health and vitality, in the 2nd and third five yearly review (p164) is particularly misleading. The only reference to BMAD in the review

document ignores mentioning the primary cause of BMAD, ie logging disturbance and attempts to perpetuate the misleading claims regarding reduced fire frequency as a possible cause.

The recently released BMAD Causal review (Silver and Carnegie 2017) belies the statement in the RFA review document that 'there is no scientific consensus on the root cause of BMAD'. The BMAD Causal Review supports what independent forest ecologists have long indicated; that 'canopy disturbance', ie logging is the primary causal factor in the development of BMAD.

It is generally agreed that the scale and intensity of BMAD outbreaks have increased considerably over the life of the previous RFAs. There is no mention of this in the review documents despite its impact being greatest in our most productive coastal forests.

There is little regeneration in BMAD affected forests, a spiralling decline in forest health, loss of all forest values including timber, biodiversity, carbon storage and catchment protection. How can this be considered to be achieving Ecologically Sustainable Forest Management? Any claims that this is the case are lies. BMAD has rightly been declared a Key Threatening Process by the NSW Scientific Committee and logging disturbance is a primary causal factor.

The RFA review document makes reference to the BMAD Working Group. The BMADWG did make a number of significant achievements in its 15 years of operation however it has not received any State Government support or met or been consulted for the past five years.

The BMAD Adaptive management trials undertaken by Forest Corp at Mt Lindsay and Donaldson State Forests (and supported by the BMADWG) have failed to demonstrate any ability of Forest Corp to improve forest health following logging disturbance.

The Forest Corp trials did provide some estimate of the cost to restore forests where logging has initiated the advanced development of BMAD to be around \$2500 per hectare. The cost to restore the tens of thousands of hectares in the Upper North East Forest estate alone is enormous and will ultimately be far greater than the net value of timber taken from these forest compartments. Logging operations in forests at risk of developing BMAD are thus neither ecologically or economically sustainable.

The establishment and spread of Lantana has also been listed as a Key Threatening Process which is initiated and exasperated by logging disturbance. It is clear that if the necessary, appropriate, ongoing, post logging restoration were being implemented native forest logging would not be economically viable.

Forest Corp logging practices during the last RFAs have seen the removal of extensive hollow bearing trees across logging compartments. The removal of hollow bearing trees has been determined by the NSW Scientific Committee as a 'Key Threatening Process' due to the number of Threatened, hollow dependent species that require tree hollows for their survival. Although a minimal number of habitat trees are required to be retained after logging operations, there has been no research to determine if the numbers are sufficient to ensure the survival of all hollow dependent species in the compartments. Many habitat trees are lost following post logging BMAD development or lost in post logging burns or removed in subsequent logging operations.

The EPBC act accreditation given to logging operations has failed to ensure the protection of Threatened Species and has in fact facilitated their decline across the logging compartments. Koalas and other threatened arboreal fauna are in serious decline and their loss is being exasperated by current forestry practices.

The Great Koala National Park proposal for NE NSW provides a viable alternative to ongoing forest destruction to help ensure the ongoing survival of koalas and other forest dependent species. Despite overwhelming community support this proposal has been rejected by the NSW State Government largely I believe on purely ideological grounds.

The often quoted importance of jobs in the timber industry is significantly exaggerated when it comes to the native forest sector. Job figures are lumped together with those of the plantation sector which overwhelmingly employs the bulk of workers in the timber industry. Additionally the increasing mechanisation of the industry results in fewer and fewer direct and indirect jobs.

The future jobs in public native forestry should be predominately in the restoration of forest values lost through past mismanagement of the public forest estate, particularly over the past twenty years. The Indigenous Githabul Rangers have been gainfully employed undertaking much needed forest restoration in the Border Ranges in NE NSW. These indigenous training and employment initiatives should be significantly expanded across all public forest areas of NSW rather than the government subsidising further destruction of our public forests through extending logging contracts.

The value of mature intact forested landscapes for carbon sequestration, the maintenance of water quality and baseline stream flows are values that have not been properly included in the determination of future best use for our public native forests.

In summary, I believe there is overwhelming community support for forest conservation rather than further exploitation which will result from RFA renewals. I don't believe that governments and industry have a social license to continue with the destruction of our public forests which will only lead to ongoing community conflict.

I believe it is time to exit native forest logging on public land and rapidly transition to a plantation based industry.

I fully support the views and conclusions of the NSW National Parks Associations review of the RFAs, Sweeney ,O.F (2016)Regional Forest Agreements .Have they achieved their aims? National Parks Association , Sydney.