

From: Michael Whatman <campaigns@good.do>
Sent: Sunday, 11 February 2018 8:53 PM
To: EPA RSD Forestry Strategic Regulation and Reform Mailbox
Cc: forests@industry.nsw.gov.au
Subject: Submission: RFA review and extension

I am writing in response to consultations on the NSW Regional Forest Agreements (RFAs) and hereby state my opposition to their renewal.

Past implementation of RFAs:

In covering Milo Dunphy's campaign to save the NSW rainforests, Meredith criticised the close working relationship between timber milling industries and the NSW forestry commission as encouraging mutual economic interest to the detriment of responsible practice and regulatory oversight.[1] Whitehouse has criticised NSW Forestry's regulatory practices and covered the Terania and Border Ranges conservation campaigns, explaining how they won support from the federal government in contentions over rainforests.[2] Frawley furthers critiques mismanagement by NSW Forestry, arguing they validated over-logging, and institutionalised a perception in the forestry industry of a right to public lands and forests.[3]

Dargravel has similarly examined the role of RFAs in mediating conflict over public forests,[4] Lane and Musselwhite and Herath have argued that RFAs had not succeeded in arbitrating the emerging constantly political disputes over public forests,[5] and there have been similar critiques from a conservation perspective about inadequate measures to ensure sustainable ecology in RFAs.[6]

NSW regulation of RFAs have been criticised recently by Sweeney and Milledge as practically logging and replacing large native forest areas with plantation habitats – showing that rather than invest in plantation lands, successive NSW governments have allowed RFAs to enable loggers to flout laws and environmental protections, destroying ecological sustainability and undermining social licence, ultimately entrenching harmful industry practices as a long-term norm.[7]

Prior to the GFC, in order to keep up with contracted timber exports from the Eden mill, the two NSW south east RFA areas experienced an increase of deforestation from 9568 hectares in 2001-02, to 14388 hectares by 2006-07.[8] Logging industries claim they struggle with investing in upgraded technologies to address environmental protections, due to risks surrounding RFA renewal and social licence.[9] Over-clearing public lands should not be relied upon to pre-empt environmental protections. 90% of forests cut in the south-east of NSW have been chipped and exported under the RFA to Japan through the Eden mill.[10] Deforestation should not be relied upon to support commodity exports, such is obviously a short-sighted unsustainable method.

Extension of RFAs into the future:

Concerns over endangered species in areas already logged around Eden and south coast state forests make communities in these areas likely places for renewed political contention and social movement campaigns that seek to preserve public lands for significant reasons.[11]

NSW State Liberal member for Bega, Andrew Constance has said flora reserves insure the possibility of later harvesting, and that the government's position was to see a continuation of subsidy and supply agreements after the south coast RFAs expire in 2018 to secure industry jobs.[12] It is likely then that more intensive logging will occur around the Shoalhaven to make up for the timber that would have come from the newly established flora reserves, which means the areas of the Shoalhaven are of key interest in addition to the far south coast.[13]

Steep slope areas of forest are also now becoming key places of vulnerability, as the forestry industry keen to move in to previously unworkable areas with new technology,[14] threatening new routines of erosion and watercourse damage, especially on steeper slopes of Northern NSW coastal forests where trials have been pushed.[15]

There are EPA and OE&H regulations etc in place for forestry activities, but there is a marked absence of government or industry representatives undertaking fieldwork of data collection and reporting back against Environmental Protection Agreements. The Forestry Authority has cut 150 regulatory field staff yet claims efficiency will be recouped through technology for loggers, such as Ipads to mark and avoid trees more specifically by GPS.[16] This does not address extensive issues.

Given the horrible records of industrial self-reporting and continued breaches of regulations, it is unlikely industries are willing to take responsibility for their lack of integrity, and it is up to government to remove the taxpayer funded RFA schemes. Considering these schemes often result in the forestry corporation transferring taxpayer subsidies to logging companies due to changing market conditions around their contracted supplies.

NSW RFAs and Environmental Sustainability:

Australia's land and forestry reserves sequester gross emissions and leave a net emissions product, and Australia accounts in this way to define emissions in base measure years as well as future years. Thus, current climate policies, which will actually increase industrial emissions 35 to 40% above 1990 levels by 2020, will require little to no action to meet the second commitment-period net-emissions targets, due to the amount of LULUCF credits Australia receives from land and forest sequestration.[17]

Our trees therefore perform an essential environmental security function in sequestering harmful pollutants that threaten environmental insecurity, reducing productivity (in any industry dependent on sustainable lands) – particularly it will contribute to agricultural loss and resource insecurity (especially water which is precarious in Australia), as well as issues like climate migration. It may seem like a small decision to sign off on logging across NSW, but to lock in 20 years of pointless, harmful activity that will induce damages well beyond its local operations and financial losses, and well into the future.

While the GFC generally depressed demand for wood and associated deforestation rates, RFA contracts stipulated a maintenance of supply from foresters or the buyback of licence contracts, and federal emissions reduction policies marked biomass burning of wood waste (up to 90% of the harvested trees) for incentive schemes.[18] Relying on dwindling LULUCF credits to curb increasing industrial emissions as the strategy for maintain international climate change obligations is problematic for ecological and economic security also.

International review of Australia's self-reporting to the UN on its carbon accounting has revealed a lack of transparency concerning emissions estimates, the failure to explain the reasoning and effects of removing the previous carbon price plan, and how it would be meeting its future targets in comparison to other states who have announced their measures.[19]

RFAs are seen as a protection for forestry industries rather than for ecological principles, and in conjunction with proposed NSW biodiversity laws, and biomass protocols in the federal ERF mechanism, signing off on RFAs will ensure logging of native forests for wood chipping and major wood-waste burning as a regressive approach to emissions reduction (proponents argue some production capability will go into complex microfibre products).

Considering also that with increasing industrial emissions, the only thing that is keeping us from being some of the worst net carbon polluters in the world is our sequestration capacity – our lands and especially our trees. Investing in a permanent reserve of native forests enhances biodiversity, and along with sequestration, guards against vulnerability through greater resilience and adaptability to extreme events, creating a positive feedback loop for emissions reduction and climate change harm mitigation policies rather than increasing severity of storm events and decreasing adaptability of biodiversity regions.[20]

In 2015, Macintosh and Lindenmayer co-presented a brief to federal Environment Minister Greg Hunt showing that ending native forest clearing in the central highlands would cover a 5% carbon abatement between 2014 and 2020

and called for further avoided forest harvesting methodologies in the Carbon Farming Initiative; Hunt ignored the briefing.[21] From LULUCF accounting benefits and UN responsibilities, through to tourism and climate vulnerability, the international dimension of NSW RFAs cannot be ignored in the governance of to land and resource management.

Land-use critiques point to the need to encourage management of native forests for carbon storage and working with international carbon credit scheme to ensure wealth and jobs, “The value of these stored resources in native forests far exceed the royalties received from logging activities, even when carbon is conservatively valued at a price of twenty dollars a tonne”.[22]

Final comments:

The RFAs are a failed model for forest management.

Today, there are over 1000 threatened species and 100 threatened ecological communities in NSW alone. 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 exempt the public native forest logging industry from complying with Commonwealth environment laws. While every other industry must comply with these laws, logging in habitat for federally listed threatened species can proceed with legal impunity under RFAs.

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.

We know from recent polling in the seats of Ballina and Lismore that the vast majority of people (90%) support protecting public native forests for wildlife, water supplies, carbon stores and recreation. 70% support the creation of new national parks to protect koalas. Less than 10% support the logging of forests for timber, woodchips and biomass burning.

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 NPA's Great Koala National Park and Forests For All plan.

RFAs were intended 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.

I re-confirm that, in accordance with personal information protection clauses, "Copyright in submissions resides with the author(s), not with the EPA".

References:

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