



Caldera Environment Centre Inc.

FOUR QUEEN STREET MURWILLUMBAH NSW 2484

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NSW Regional Forest Agreements
Forestry Branch
Environment Protection Authority
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22nd February 2018

Caldera Environment Centre (CEC) has been established in Tweed Shire for the past 26 years to promote the protection of the environment. Our members **object to the current proposal to renew RFAs** in New South Wales and particularly in our north east region.

We would like to submit the following reasons for our objection.

The current system is out of date and has not provided sustainable forest management, the community need a system which will ensure the ongoing survival of our forests and the habitat they provide for native fauna.

Forests management under the current system has had little regard for ecosystems and fauna. The focus on removal of timber at any cost has resulted in breaches to the codes to protect the environment. Breaches include the removal of valuable habitat trees, riparian damage and erosion causing pollution of waterways. Breaches have only been made public because of investigation by committed environmentalists. Notified breaches have resulted in minimal if any consequence.

Due to poor management of native forest we support the National Parks Association of NSW's Forests For All plan which incorporates protection of forests while providing for appropriate recreational and education uses.

In the south of our region the Great Koala National Park proposal is supported by the CEC to protect Koalas and other native flora and fauna. We consider that logging of forest is detrimental to the conservation of Koalas. There have been reported cases in the north east where there has been evidence of the removal of Koala habitat trees and disruption and injury to Koalas. The large mature eucalypts sought for timber are vital as habitat (food source or nesting hollows) for other species such as Greater Glider, Masked, Sooty and Powerful Owl and Glossy Black Cockatoo.



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A change from logging of forest trees to conservation of forest will result in benefits to reduce the impacts of climate change, conserving water and carbon and providing social and environmental benefits.

CEC members confirm that our 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.

CE members understand that the Environment Protection Authority, Department of Primary Industries and/or the independent reviewer may contact the executive about this submission.

Regards

Cynthia Brook Secretary

Rhonda James Co-ordinator

CEC in addition supports the National Parks Association submission.

The RFAs are bad for forests

- Almost 20 years after the RFAs were signed, there is extensive evidence that the RFAs have failed to facilitate Ecologically Sustainable Forest Management; failed to result in an economically sound timber industry; and the CAR reserve network of forest ecosystems has not been delivered. RFAs are therefore a failed model for forest management and should not be renewed.
- EPBC accreditation of logging operations has resulted in lower protection for forest species, and has not been complied with, as demonstrated by the multitude of license breaches. Commonwealth oversight of forest management must be restored.
- The review's progress report frequently addresses indicators without providing any data. For example, no spatial data is provided to assess the change in forest growth stage over the life of the RFAs, no data is provided to assess the proportion of each forest ecosystem protected or impacts on species and no data is provided on the value of forest-based services.
- The number of threatened forest species has continued to rise during the RFAs, with iconic species like koalas and gliders now either absent or experiencing population crashes in many parts of NSW. Logging is identified as a key threat to many forest species, often because of the impact logging has on key habitat features like hollow-bearing trees.
- Logging kills forest animals and is therefore an important animal welfare issue.
- Climate change was not considered as part of the RFAs, but is now the largest social, economic and environmental challenge we face. It is reckless to continue logging when we know it reduces carbon stores of forests.



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- The RFAs removed public oversight of logging by excluding 'third parties' from taking legal action on logging breaches. This has resulted in a lack of accountability and transparency in their implementation and has favoured industry over the public interest.

Jobs and the economy

- The NSW taxpayer has paid millions of dollars to a multi-national corporation to buy-back non-existent timber because of over-estimated timber volumes by Forestry Corporation. This is one of a series of subsidies that the logging industry receives.
- The logging industry is one of the most mechanised and most dangerous. The number of direct jobs in the industry has steadily declined and is now estimated as under 400 across NSW.

Alternative options for public native forests

- We have other options besides logging. NPA's *Forests For All* plan is proposing that we protect public native forests and use them to increase public access for health and economic benefits. NPA's Great Koala National Park proposal is designed to protect the world's favourite animal.
- There are many forested areas in the three RFA regions that should be protected in the reserve network. For example, the forests of northern NSW are one of just 36 global Biodiversity Hotspots, there are forested areas across NSW that should be World Heritage, and there are outstanding wilderness
- We know that the value of carbon, water and tourism from forests is much greater than timber, and that protected areas are important for the economy. The Government must assess these trade-offs as part of a genuine review.
- Polling conducted in the north coast electorates of Ballina and Lismore in December 2017 showed that 90% of people support protecting forests for nature, water, carbon and recreation. Under 10% supported logging for timber, woodchips and biomass burning.

The consultation process

- The NSW Government has already committed to extending the RFAs. This commitment was made prior to the review that is now being conducted, so this consultation cannot be regarded as genuine. The review should be collating evidence to assess the performance of the RFAs with a view to making an evidence-based decision assessing whether they are an appropriate model for forest management.
- The consultation process is entirely inadequate as the outcome appears to be predetermined. The RFAs affect two million hectares of public property in NSW, and very few people under the age of 30 are likely to have heard of RFAs. A concerted effort must be made to have genuine community consultation on the future of public native forests.



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- The reviews are so late as to make them meaningless. The entire rationale of the reviews – that the community can have confidence in the RFAs because of a transparent and timely review – has been seriously undermined.
- In order to be effective, the independent reviewer must consult independent scientists (not just government agencies) and must undertake on-ground inspections of logging impacts with community groups.