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**To:** EPA RSD Forestry Strategic Regulation and Reform Mailbox <Forestry.Policy@epa.nsw.gov.au>

**Subject:** NSW Regional Forest Agreements Second and Third Five-Yearly Review

***Submission on NSW Regional Forest Agreements Second and Third Five-Yearly Review - Heather Kenway***

Writing of the problems of the Murray Darling Basin in the Sydney Morning Herald on 21 February 2018 economist Ross Gittens said:

“It's blindingly obvious that the economy – that is, human production and consumption of goods and services - exists within the natural environment....

“It's equally clear that economic activity can damage the environment and its ability to function....

“We're exploiting the environment in ways that are literally unsustainable, and must stop doing so before the damage becomes irreparable. We're exploiting the environment in ways that are literally unsustainable, and must stop doing so before the damage becomes irreparable....

“Since it's hard to be sure when damage to the environment has reached the point of no return, there's a great temptation to say doing a bit more won't hurt. I'll be right, and the future can look after itself. Business people think that; politicians even more so.”

The same is true of the management of NSW's public native forests under agreement between the Commonwealth Government and the Government of NSW.

Under successive governments for the nearly 20 years of the Regional Forest Agreements managers of the national parks and reserves have been progressively starved of human and financial resources to fully discharge their responsibilities. Management of the “production forests” - many areas of which are worthy of national park status - has failed on economic as well as environmental grounds.

In spite of all the evidence pointing to unsustainable management of the native forests, all the economic losses, all the environmental damage, all the alternative approaches that have been raised, the Commonwealth and NSW Governments have decided that the RFAs should be rolled over indefinitely, without an open and independent reassessment of the consequences of the last 20 years. The politics of the forestry industry are way out of kilter with industry economics and environmental responsibility.

The natural world is not static. It is constantly changing, in short and long cycles, in response to seasons, weather patterns, climate change, human activities.

On this ever-changing natural world our governments have imposed a framework of forest and forestry policies that are essentially static, too rigid to respond to change

despite avowals of support for adaptation as new knowledge emerges or circumstance alters.

The Commonwealth.State Regional Forest Agreements have three aims:

- a comprehensive, adequate and representative reserve system (CAR);
- ecologically sustainable forest management (ESFM) in 'production forests';
- long term stability for forest based industries.

In the three NSW RFA areas (North, Eden and Southern) both the CAR reserve system and ESFM as practiced in native forests have been shown to be inadequate for protecting species and ecological communities.

Modification of reserve areas and logging practice has not been sufficient to meet RFA aims.

Under the RFA regime the ecological integrity of the forests has been changed for the worse; multi-aged, multi-species forests have given way to large tracts where species diversity is severely reduced, and single tree species are now dominant over large areas. In higher areas in the SE trees are not regrowing: with no canopy the young seedlings are killed by frost. Dense regrowth forests on the boundaries of townships are a fire hazard. Waterways are silted up. Some bird and animal species are close to extinction; without birds and animals remnant forest is unhealthy. Weeds like lantana, and bell miner dieback and feral animals are major problems.

The soils experts say that full recovery is virtually impossible after three successive loggings, and many areas of NSW forest have had that number or more - actually or nearly clear-felled, with understorey scraped away.

The forest based industries have been far from stable, markets have undergone major change domestically and internationally, mechanisation has decimated the labour force, mills have closed. New technology will force further change. In the face of developments that required serious change in logging practices, nonetheless the NSW forestry agency (Forests NSW, now corporatised as the Forestry Corporation of NSW) has pressed ahead - over-logging, over-committing supplies, giving wood supply primacy over other forest values. And successive Governments have generally backed this approach, enforced cost savings, and cut funding for the environment agencies, EPA and OEHL and the Parks Service particularly, making it impossible for them to develop and maintain their environmental protection roles in regard to forests available for logging or the forests in reserve categories.

The native forest sector of the forestry industry in NSW (as is the case in other States also) is unprofitable despite subsidies and concessions that are unavailable to other industries. It is fundamentally uncompetitive in domestic and global commodity markets, and will remain so.

The native forestry sector cannot compete with plantations for almost all domestic wood construction materials; and in the global woodchip market native forest chips have been in long term decline for many years.

Plantations require only about one-tenth the area to produce the same volume of wood as can be got from native forests. Native forest logging therefore has higher costs. The environmental cost from loss of habitat is also much higher. In the first

decade of the RFAs in the SE of NSW larger areas were needed initially to meet sawlog commitments. As greater proportions of regrowth forest subsequently had to be logged the areas logged also increased. The NSW Department of Primary Industries is now floating proposals that the northern forests could supply three wood-fired power stations to generate electricity - which would increase logging because it could take logs from trees that were too red or too hard for the woodchippers. It is total stupidity to go down this path, adding to the destruction of major carbon stores at the very time climate change impacts seem to be becoming harsher and more frequent. NSW is becoming hotter and drier, further stressing the forests.

The Commonwealth/NSW review of the period 2004-14 meets technical legal requirements on reporting on actions over the period to meet specified criteria. It contains much useful (and some inaccurate) information that could be helpful for future management regimes. But it is an inadequate base from which to have taken the decision to roll the RFAs over indefinitely, and with even weaker environmental protections than are afforded by present management. It is particularly lacking the necessary data and analysis of declining productivity and increasing costs in native forest logging.

Enough information has been provided to successive governments by ecologists, economists and conservation organisations over the years to demonstrate that the RFAs have failed to achieve their stated goals, they have been unable to achieve ecological sustainability. It is time now for a total realignment of policy.

The RFA regime should now be ended, transition measures put in place, and new management arrangements developed to start the task of rehabilitation reflecting the full range of values of the forests.

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