

Submission to the Review of the Draft Coastal IFOAs.

By Seán Burke

I make this submission to express my absolute disgust with the way that the NSW Government, in collaboration with the so-called Environment Protection Authority, has sought to surreptitiously renew the Regional Forest Agreements and change the rules governing logging so that further unacceptable destruction can be undertaken of our publicly owned native forests. Future generations will condemn us for our stupidity.

I won't waste my time discussing the details of the IFOA remake as I believe that it should be scrapped altogether, the RFAs allowed to expire and the timber industry transitioned into a plantation-based operation. However, I do wish to comment on the deceptive ways that these processes have been undertaken, treating the general public as fools.

Firstly, the opening statement on your website states *"They also set requirements to achieve ecologically sustainable forest management in NSW."* This is actually a bare-faced lie as the EPA knows that these proposed changes spell the end of what little ecologically sustainable forest management has been practiced in NSW over the period of the RFAs. They know this by the fact that the NSW Government admitted that they have run out of sufficient resource to fulfil their wood supply agreements and the fact that they found over 4,000 breaches of Environment Protection and Threatened Species Licence conditions in their mere 187 audits of native timber harvesting operations from 2004 to 2014. These breaches haven't even been declining over that period.

Secondly, you follow up with *"The draft Coastal IFOA is important to everyone as it balances environmental outcomes and timber production."* Another bare-faced lie and one of so many being practiced by this government and the department that is supposedly there to look after our environment. The Natural Resources Commission clearly stated that *"...the Commission has determined that it is not possible to meet the Government's commitments around both environmental values and wood supply."* So why does the EPA put such bullshit on your website? You are supposed to represent environmental protection rather than be a propaganda mouthpiece of a corrupt government where you support increased timber production of protecting environmental values.

These proposed changes to the IFOAs actually remove some of the limited protections that were previously provided for threatened species and ecosystems rather than tightening up the provisions so that realistic protections can be provided. We have one of the highest species extinction rates on this planet and adoption of this draft IFOA will ensure that this rate continues to increase. The proposal to reduce streamside buffers is probably one of the worst suggestions in the whole draft. These areas are the most important for many species of birds and animals with access to water, understory and nesting sites that are critical for their survival. The impact of this change on erosion and water quality and quantity is also totally unacceptable. Reducing those buffer areas is a blatant act of vandalism to access more timber and I consider it to be criminal.

As I said previously, it's time to end the heavy loss-making logging of our publicly owned natural native forests and transition to a plantation-based industry, thereby allowing our state forests to be opened up to their multitude of values when left standing. There have been many years of work put into developing the Great Southern Forest proposal here in South-East NSW and it is our belief and that of many, many other organisations that this proposal is a far more equitable and workable solution for our forests than extending the RFAs and reducing environmental protections through this IFOA remake. The Great Southern Forest advocates that the Federal and State Governments:

1. Espouse a new, ethically responsible long-term vision based on recognition that our public native forests now have greater environmental and economic value if left standing than being logged for woodchips; and acknowledge that plantation timbers surpass our domestic and export wood needs,
2. Endorse changing management of these biodiverse ecosystems from destructive and loss-making logging under outdated, failed Regional Forest Agreement regimes to their crucial roles in the climate and water cycles, and now halt and reverse declines in their major contributions to species diversity and community well-being,
3. Develop new management arrangements by drawing on science and Aboriginal land management knowledge to empower Traditional Owners and others to participate in a highly skilled workforce in diverse regional jobs in forest restoration and adaptation, and
4. Acknowledge the respect regional communities have: for our native forests and the life they support; for their carbon sequestration and climate mitigation benefits; and for their intrinsic uniqueness and beauty.

I have attached a copy of the GSF Executive Brief for your information. Further information and the full brief is available on the Great Southern Forest website here: <http://www.greatsouthernforest.org.au/index.html>

I hereby call upon the NSW Government to stop proceeding with these changes to the IFOAs and:

1. Recognise that the Regional Forest Agreements have failed to deliver environmental protection or industry security,
2. Recognise that the benefits of non-timber forest values are vital for the future of regional economies and ecosystems where very few jobs are provided in the native forest logging industry,
3. Establish the Great Koala National Park as an immediate priority,
4. Seriously consider the Great Southern Forest proposal as an alternative paradigm for managing our forests in South-East NSW and take steps to bring this about as soon as possible,
5. Commit to a just transition out of native forest logging on public land,
6. Ensure that public forests are managed for the public good (i.e. tourism, environmental repair, carbon sequestration and storage, wildlife habitat, provision of clean and abundant water),

7. Stop planning to log areas protected as habitat for threatened species, koalas, old growth forest, rainforest and stream buffers,
8. Stop increasing logging intensity and legalising clearfell logging along the North Coast of NSW,
9. Stop propping up the native forest logging industry at the cost of species extinction, logging dieback, reduced stream flows and water quality decline and sustainable forest-based jobs,
10. End the logging of public native forest and complete the transition of the timber industry to 100% plantations, and
11. Transfer all existing subsidies from native forest logging into native forest restoration.

If these changes to the IFOAs are allowed to proceed and the RFAs are renewed as the governments are deceitfully planning, then I can assure you that all hell will break loose and the Forest Wars will be reignited until our governments start to take environmental protection and climate change seriously.

IT'S TIME TO END THE MADNESS.

Great Southern Forest - Executive Brief

The core of the Great Southern Forest proposal is to reorient management of South East (SE) NSW public native forests from industrial logging to prioritise ecological integrity of our continent, climate stabilisation, water security and carbon sequestration, thereby activating new money and new jobs in the regional economy.

The Great Southern Forest proposal is a widely researched, solutions-based initiative for the carbon and biodiversity dense SE NSW native forests. It offers nature-based solutions to critical national and global problems at low cost and with great benefit for climate stabilisation, environmental and economic success, increased resilience and biodiversity, regional employment, Indigenous participation and social coherence. This new model of forest management is relevant and transferable nationally. Implementation of the proposal can reduce forest fragmentation enabling the connectedness and resilience to withstand and ameliorate a disrupted climate.

Great Southern Forest proposal recognises that:

- forests are vital for climate stabilisation of the planet;
- existing mature plantations can meet Australia's timber needs;
- while the Regional Forest Agreement process provides a timely window of attention on native forests, its assumptions and outcomes are clearly outdated in the light of scientific evidence and the recognised importance of forests on climate and water cycles;
- the present system of management of SE native forests for timber extraction has overseen large environmental, economic, social and employment losses with inestimable damage to soil, water, biodiversity, wildlife, habitat and canopy thus drying out the forests.

The Great Southern Forest vision, in a new and ethically responsible way, recognises that public native forests have more significant values than their present use as a source of wood which can now be met by plantations. This vision entails changing management of these biodiverse ecosystems from destructive and loss-making logging under the failed RFA regimes to prioritise their crucial roles in the climate and water cycles, and to their major contributions to species diversity and community well-being.

New forest management arrangements can draw on the best current scientific advice, Indigenous knowledge and successful overseas models; train a highly skilled workforce for diverse new regional jobs in forest restoration; maximise carbon sequestration and climate mitigation benefits; share the value and respect regional communities have for the beauty and uniqueness of our native forests, and safeguard the conditions for Life for all their living creatures. Importantly, this is not a proposal for further reserves although this may be appropriate for some areas.

Great Southern Forest recommendations for the NSW and Commonwealth governments are to:

- 1 Implement a timely re-orientation of management of public native forests in SE NSW from timber extraction to ecological integrity, climate stabilisation, water security and carbon sequestration;
- 2 Cease logging and woodchipping in SE NSW state native forests;
- 3 Enact the full transition to plantations for wood supply;
- 4 Terminate the Eden and Southern Regional Forest Agreements, reinstate full Commonwealth environmental protection and pilot this new model of forest management in SE NSW;
- 5 Ensure implementation of a Just Transitions program for SE NSW timber workers;
- 6 Extend Indigenous partnership in management and employment;
- 7 Prioritise forest preservation and restoration in the 432,575ha of SE public native State forests.