

Submission to the Draft Report on Progress with Implementation of the New South Wales Regional Forest Agreements (RFAs)

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Dear Sir/Madam.

Please note the following points that I wish to make.

The scope of the RFA reviews is completely inadequate to address the impacts of industrial logging on forests in the face of escalating climate change threats. They do nothing to monitor the actual impacts of the RFAs on the forests and on conservation outcomes.

The milestones and the review process does not allow consideration of key issues such as: the adequacy of the reserve system, protection of threatened species, wood supply to meet commitments, threats to forests from climate change, and the role of stored carbon in mature forests in mitigating the effects of climate change.

RFA requirements for conservation actions in production forests need to be monitored, measured and reported on in a timely and accessible way and this is not happening.

The reviews are between three and five years late and the annual reporting they required has not occurred in a timely manner. These failures are deliberately glossed over and hidden by this review. They should be made very clear, and heavy penalties set for any such failure in future.

The RFAs included clauses that required that parties undertake further assessment of areas that were identified as meeting World Heritage requirements (ie s27 NERFA). This clause has never been implemented and is ignored in the review, which just focuses narrowly on milestones.

The review should require that the clauses relating to World Heritage assessments are implemented immediately – triggering an urgent assessment of the Alps to the Sea, Moonee-Bindery and Broader Blue Mountains areas identified by the World Heritage Expert Panel.

The RFAs included clauses requiring a FRAMES and wood supply review be completed by certain timeframes, but these have never been properly conducted, particularly in the north-east, where revised 20 year wood supply agreements were signed without a proper FRAMES review. The review should require immediate comprehensive FRAMES reviews.

The RFAs rely on the NSW legislative regime controlling logging to deliver 'ecologically sustainable management (ie s36 NERFA). However, those conditions are subject to change, and have been markedly weakened since the RFA was signed. There should be a mechanism to prevent such reductions in protections over time.

Reporting on achievement of milestones in the review is flawed. For example the reporting of milestones for the North East RFA reported no milestones as not completed or not completed on time. A review for NPA assessed 29 milestones not completed and 11 not completed on

time. It presents as an untenable whitewash of the true facts about implementation of the RFA.

There is a need to improve transparency and accountability of forestry operations under the RFAs. The Commonwealth should be given a role in monitoring, compliance and enforcement to assess if RFAs are achieving their objectives.

A more fundamental overhaul than the five-year reviews is required. It should start with a revision of the almost twenty year old National Forest Policy to focus on conservation and carbon sequestration and other climate change issues, the water cycle and the phasing out of native forest logging.

In the absence of more fundamental reforms increased independent scientific oversight, stronger requirements for RFA reviews and stronger performance audit arrangements should be implemented.