

Public submission document on the draft report on Progress with Implementation of NSW Regional Forest Agreement(s).

Regional Forest Agreements have failed to deliver for NSW the outcomes for which they are intended. For this reason, this submission calls for the RFA's to be cancelled and a review commission set up to determine a way forward for the sustainable management of native forests.

This submission argues that RFA's should be cancelled and that a commission of inquiry should be set up to investigate the practices of ForestsNSW and to investigate the establishment of a new framework for the maintenance and protection of Australian Native Forests.

This submission argues that RFA's should be cancelled on the following grounds:

1. They have failed to take account of the critical role for native forests in averting climate change;
2. The rate of logging is unsustainable.
3. They have failed to take account of the available plantation timber resource, even though it was first and foremost a timber supply agreement
4. They have failed to take account of the deleterious impacts of intensive logging on the quality and quantity of water supplies;
5. Their processes are seriously flawed.
6. They have failed to protect wildlife, biodiversity and endangered ecological communities.

1. They have failed to take account of the critical role for native forests in averting climate change;

The vast weight of scientific evidence now supports the crucial role that forests play in averting climate change. Australia's old growth forests are amongst the most carbon dense in the world, and play an important role in sequestering carbon from the atmosphere. For instance, Mackey and colleagues found the highest amount of carbon was contained in a forest located in Victoria's Central Highlands, which held *1900 tonnes of carbon per hectare*. By comparison, the average tropical forest had somewhere between 200 and 500 tonnes of carbon per hectare. The best way to sequester carbon forests is to protect existing old forests.

"If you take one of these mature [mountain ash] forests with 1900 tonnes of carbon in it and trash it ... it's going to take hundreds of years to grow back that amount of carbon." (Mackey)

The loss of natural forests around the world contributes more to global emissions each year than the transport sector. Curbing deforestation is a highly cost-effective way to reduce emissions; large scale international pilot programmes to explore the best ways to do this could get underway very quickly. Catchment planning agencies have almost unanimously concluded that forests are more valuable left standing in catchments than sold as timber.

2. The rate of logging is unsustainable.

The Forestry Commission, trading as Forests NSW, have logged old-growth, rainforest and mature age forests unsustainably. FNSW have continuously logged over quota since the implementation of the RFAs., clearfelling or patch clearfelling on the ground. Eighty percent of trees felled are turned into woodchips. While a tree may take 80-150 years to grow to maturity, forests are logged on around 20 year cycles. To meet wood supply commitments, the native forests managed by Forests NSW are being cut faster than they are growing back.

In the south east of NSW, covered by the Eden and Southern RFAs, the annual net areas logged have rapidly increased and yields have fallen. The industry is having to log ever greater areas to maintain the same levels of production. This is not sustainable. Demonstrably unsustainable timber volumes were committed for twenty years, and these even extend beyond the term of the RFAs.

3. They have failed to take account of the available plantation timber resource, even though it was first and foremost a timber supply agreement.

The logging of natives forests is completely unnecessary when there is sufficient plantation wood now available for virtually all current domestic and export purposes.

4. They have failed to take account of the deleterious impacts of intensive logging on the quality and quantity of water supplies.

Water supplies are adversely affected by logging. Logged areas suffer on average a 50 per cent reduced water yield. Young regrowth trees need more water to grow, thus releasing less water into river catchments. It takes 150 years for water yields to regain their pre-logged status.

Further studies have shown that logging adversely affects water quality through increased sediment entering rivers. Logging actually increases the risk of fire by opening up the forest, increasing the amount of fuel on its floor, and drying the forest out. In this era of increasing dryness on our continent, and the continuing threat of fires, the loss of water of this magnitude cannot be justified.

5. Their processes are seriously flawed.

The native forest timber industry has exerted undue influence to ensure desirable outcomes for its shareholders at the expense of the current and future generations of the State. Settlements have bypassed the regulatory process in which the public interest, not represented by private parties, could be aired.

The RFAs have not been properly implemented, review timeframes have not been met and key components have not been conducted. The conditions on logging under legislative regimes, on which the RFAs rely to deliver 'ecologically sustainable management', are inadequate, frequently breached and very poorly enforced. In addition, third party appeal rights have been removed in NSW.

There has been no systematic monitoring of logging operations. The extent to which milestones and obligations have been met, the results of monitoring of sustainability indicators, and the performance of the Agreement are exceedingly below satisfactory levels.

Established criteria for forest conservation have not been not fully applied. There are large areas of high-value conservation forest that would have been reserved if the RFA criteria for forest conservation had been implemented.

5. *it has not protected wildlife from the impacts of logging.*

Intensive logging has meant that millions of birds and animals are killed every year as a result of loss of habitat, and many are killed during logging operations, either instantly through trauma or post logging predation, or by slow and painful starvation due to loss of shelter and food. There are many endangered species as a result of the impact of logging.

The Regional Forest Agreements are severely inadequate to protect forest species and forest habitats. The conservation targets of almost all nationally-listed fauna species and many nationally-listed flora species were not achieved through the RFAs and substantial additional conservation action is still required to meet minimum benchmarks.

Using the NSW Government's own conservation analysis and data produced during the Comprehensive Regional Assessment, it is evident that only one of the twenty nationally-listed forest fauna species met their conservation targets after the RFAs and many nationally-listed flora species have fallen dramatically short of their targets. The number of threatened and endangered species has risen since the RFAs were signed and many threatened and endangered flora and fauna species are at extreme risk from current logging operations.

The RFAs have failed to deliver the intended protection for environmental, wilderness and heritage values that state and federal governments committed to when they signed the National Forest Policy in 1992. It is now time to conduct an independent inquiry that includes all stakeholders with the objective of establishing a new regulatory framework for managing our native forests.

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