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Ourimbah Community Inc. wishes to comment on

The first Draft Report on Progress with Implementation of the New South Wales RFAs
<http://www.environment.nsw.gov.au/resources/forestagreements/09200draftrfa.pdf>

The draft report is dishonest spin. It represents a marketing view of bureaucratic records, it does not represent what is actually happening in the forests. Here is an alternate view.

A case study from Ourimbah State Forest is appended and shows that:

- FNSW keeps multiple sets of documentation, mutually contradictory, for different purposes (for the EPA, for their subcontractors, ...).
- Within FNSW there is a systemic culture of operations outside of the RFA guidelines
- EPA 'desk check' plans, they rarely see what is actually happening on the ground. The regulators allow themselves to be deceived.
- When blatant breaches of the RFA licence conditions are reported to the EPA by the community, even when these complaints involve clearing within RFA CAR reserves and extirpating populations of endangered species, information is not passed to NPWS for action.
- Bullying, intimidation and harassment are common techniques used by FNSW against members of the community who disagree with their views.
- FNSW is unreasonably selective in the documents it releases under FOI requests. Their operations are often clandestine and dishonest.
- The current generation of native timber harvesters believe that the end of the RFA period will mean the end of native forest logging. They have no incentive to harvest sustainably. They are systematically plundering the last of the forest resource, along creek-lines and steep slopes hitherto inaccessible, using modern machinery bought with 'structural adjustment' money.

If the RFA agreements are to continue, then FNSW must be forced to operate within their licence conditions. All activities should be licenced. Both the EPA and NPWS must be involved, on the ground, to ground truth plans for any forestry activity within 500m of any reserve before any activity happens.

The community has lost all faith in FNSW, and their supposed regulators. We ask that the RFA not be continued and that all logging in native forests cease. There are sufficient plantation timber resources to absorb displaced workers. Given our current precarious climate and the prospects of further climate change, all remaining native forest should be retained.

Ourimbah Community Inc.
4th Sept 2009