

# SUBMISSION COVER SHEET

## NSW Regional Forest Agreements Second and Third Five-Yearly Review

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### PLEASE COMPLETE:

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## **SUBMISSION TO NSW REGIONAL FOREST AGREEMENTS SECOND AND THIRD FIVE YEARLY REVIEW**

### **PERSONAL BACKGROUND AND KNOWLEDGE**

I am a resident of Port Macquarie and have lived here continuously since 1975, raising a family here. I have witnessed many changes to the Mid North Coast area and I have observed with some consternation the adverse effects of increasing population and the urbanisation of the landscape on natural systems. I have been a frequent visitor and user of the local forests including those that are reserved as National Parks and State forests. I have been actively involved in past campaigns to preserve important aspects of our forests, namely rainforests and the contingent associated wet and dry sclerophyll forests in this region.

I'm acutely aware of the impact of increased residential and rural development on our diminishing forest habitat. I have observed at firsthand what can only be described as intensifying forest logging with clear felling of larger areas, unlawful cutting of mature trees, filter strips along creeks not respected and soil conservation measures ignored or only partially and often badly implemented. These intensified logging regimes seem to be occurring more often giving the impression it is not being regulated with sufficient vigour and consequently much more damaging.

### **THREATS TO FOREST BIODIVERSITY**

While National Parks protect some significant areas, many of these areas are in the outer highland escarpment areas; those forest recently added to our national park estate closer to the coast, have been severely degraded by repeated cycles of logging with simplified and degraded forest structures.

The State Forests generally occupy the coastal plain and midland hills areas with richer soil types. These have been reduced both in terms of tree size and floristic complexity over many years of repeated cutting (over cutting) with a legacy of many even aged trees and reduced tree species; these look more like plantations than the rich diverse forests they once were.

Reducing floristic complexity reduces habitat for plants and animals. Certainly, there is no credible scientific opinion that argues against this idea. Studies show\*1 the simplification of forests structure through repeated logging means that many of the habitat requirements of forest plants and animals are increasingly difficult to meet, especially those on the threatened and endangered lists. The number one factor in preserving plant and animal diversity in the long term can only be achieved through protecting and maintaining habitat.

### **NOT ENVIRONMENTALLY SOUND, IMPARTIAL NOR ECONOMIC**

So, what is the Governmental and FC approach to forest management as revealed in the RFA documentation and their public policy pronouncements? The local industry representatives have seized on the fact of the current degraded status of forests to suggest logging them even more heavily as "thinning" and removing "forest waste and residue". They claim their "improvements" in logging practices are likely to enhance habitat and plant and animal survival.

This is contrary to most credible scientific opinion and evidence from past and current logging regimes and practice. These approaches are seemingly strongly supported by the FC and presumably by the State Ministers for Forests and Primary Industry.

The Environmental Protection Authority (EPA) regulator has been criticised for failing to adequately investigate breaches of important regulations and conditions and there has been a significant fall off in the number of successful prosecutions over recent years to nil.

I have absolutely no confidence in the capacity of the State government through its instrumentality the Forestry Corporation (FC) to honour the commitments and undertakings they are making through the Regional Forest Agreements (RFA) processes to protect the natural environment and the inherent values of complex forest ecosystems.

To provide even a modicum of protection they will be required to manage the increasing resource demands linked to increasing harvested sawlog volumes and increasing harvesting of so called “forest wastes and residues”.

It is obvious from the information provided in the RFA documentation they aren’t interested in seeking any balance. Their intention is increase wood production volumes. An important component of this is to “wood chip” our forests for the dubious purpose of using wood as renewable energy source (as well as provide pulp for other purposes). The proposal is to establish furnaces to produce electricity at Bulahdelah, Kempsey and Grafton, and other undisclosed locations.

### **OVERSEAS MARKETS AND ‘FAKE’ RENEWABLE ENERGY**

Another aspect not frequently highlighted is the growing lucrative overseas markets for pelletised wood for the renewable energy markets in countries like Japan, Europe and China. These markets may well be the Forest industries real intention.

These proposals are linked to classifying wood as a renewable energy resource. The science does not support this classification. The increasing evidence of increasing world temperatures, the failure to meet even modest targets set out in the Paris Climate Accords, and Australia’s failure to meet our obligations to reduce emissions and the increasing public demand to decarbonise our energy production systems within our economy, will soon make this even clearer. Delinking carbon from meeting our energy needs will make these markets unviable. \*2

If they can proceed with their hyperinflated resource allocation models to meet so called “renewable” energy needs from wood, they are pronouncing the death knell of the forests as we have known them.

### **FLAWED CONSULTATION AND FAILED PROCESS**

The FC is neither independent nor impartial- the State Forests are frequently referred to these days as “FC forests” not State forests “owned” by the public of NSW. Many of the important issues you would hope we could comment on, not least of which would be an examination of the RFA process itself and whether it should continue, is not open for comment. This is despite there being a growing body of evidence of failure by expert scientists and prestigious environmental organisations showing that the RFA process is seriously flawed and not able to provide the protection our forests need.

It appears to me and a growing number of people that the Forest industries have captured the regulator with the connivance of the present state government: that the marketeers are determining public policy in relation to the management of our State forests and other important forested private lands: it certainly not based on a proper assessment of the full economic, environmental and social costs involved and what would be considered the longer term public interest.

## **LARGE PUBLIC SUBSIDY**

Even if we accepted only a small part of their fantastical projections for forest production and market projections, the FC would need to employ many more staff to adequately meet the surveillance and monitoring requirements, further exacerbating the size of the public subsidy already provided. Any serious application of the protections that are needed would reduce the wood production volumes even further, increasing costs, to make it even more uneconomic than it is already. \*3

## **“CRONY” CAPITALISM AT ITS WORST - NOT IN THE PUBLIC INTEREST**

The present State government is promoting policies and practices to advantage the narrow sectional interests of a heavily State subsidised forest industry enabled by a complicit FC and a EPA regulator, carrying out a de facto privatisation of our forests against the longer term public interest.

## **CLIMATE CHANGE -RETHINKING PUBLIC INTEREST**

The public interest requires rethinking and could be more properly addressed through preserving our forests, not only for their importance to world heritage and biodiversity but also as carbon sinks, aiding us considerably in meeting our carbon emission targets and preventing runaway global warming. Not to mention also the importance of the long term economic and employment benefits, of a substantial “green” inspired tourism industry and protecting the watershed for a burgeoning urban population.

## **INDEPENDENT ENQUIRY NEEDED**

Before launching an unprecedented and unwarranted 20-year assault on our North Coast forests I am asking for the RFA process to be halted and to be subjected to an independent public enquiry before proceeding any further with its implementation. If we had third party rights of appeal this would be guaranteed!

Frank Dennis

## **References:**

- \*1. <https://npansw.org/wp-content/uploads/2017/12/Regional-Forest-Agreements-Report- web.pdf>
- \*2. [http://www.climatecodered.org/2018/01/displacing-coal-with-wood-for-power.html?utm\\_source=feedburner&utm\\_medium=email&utm\\_campaign=Feed%3A+ClimateCodeRed+%28climate+code+red%29](http://www.climatecodered.org/2018/01/displacing-coal-with-wood-for-power.html?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+ClimateCodeRed+%28climate+code+red%29)
- \*3. <http://www.tai.org.au/sites/default/files/P209%20Money%20doesn%27t%20grow%20on%20trees%20-%20NSW%20Forestry%20Final%20Final.pdf>

**Footnote:** I have submitted other form letter submissions without cover sheet. I want this document considered as my primary submission and ignore any other submission in my name.